



AIRAN LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY



SHORT TITLE & APPLICABILITY

This Policy describes and contains the Company's philosophy for delivering its responsibility as a corporate citizen and lays down the guidelines, process and mechanisms for undertaking socially useful programmes for welfare and sustainable development of the community at large. Titled as the "**Airan Limited CSR Policy**", this Policy has been prepared keeping in mind the Company's business ethics and the requirements of the Companies Act, 2013 (hereinafter called as "the Act") and the Companies (Corporate Social Responsibility Policy) Rules, 2014, notified by the Ministry of Corporate Affairs vide Notification dated 27th February, 2014. Notwithstanding any provision mentioned in this Policy, any change thereto with respect to the legal framework of Corporate Social Responsibility as specified in Section 135 of the Companies Act, 2013 read with relevant rules, shall have effect including the statutory amendment and modifications thereto in the legal provisions.

2. DEFINITIONS

2.1 '**Act**' means the Companies Act, 2013;

2.2 '**Board**' means the Board of Directors of Airan Limited;

2.3 '**Company**' means Airan Limited;

2.4 '**Corporate Social Responsibility (CSR)**' means and includes but is not limited to

(i) Projects or programs relating to activities specified in Schedule VII to the Act or
(ii) Projects or programs relating to activities undertaken by the board of directors of a company (Board) in pursuance of recommendations of the CSR Committee of the Board as Per declared CSR Policy of the company subject to the condition that such policy will cover subjects enumerated in Schedule VII of the Act.

2.5 '**CSR Expenditure**' shall include all expenditure including contribution to corpus, or on projects or programs relating to CSR activities specified in this policy as approved by Board on recommendation of CSR Committee;

2.6 '**CSR Committee**' means the committee constituted under the provisions of Section 135 of the Act;

2.7 '**Directors**' shall mean the directors of the Company;

2.8 '**Net profit**' means the net profit of a Company as per its financial statement prepared in accordance with the applicable provisions of the Act and Rules Made thereof.

3. CSR VISION STATEMENT & OBJECTIVE

Corporate Social Responsibility is a form of corporate self-regulation integrated into a business model. Therefore, the Policy will function as a built-in, self-regulating mechanism whereby the business will monitor and ensure its active compliance with the spirit of law, ethical standards and international norms.

The main objective of the Policy is to establish the basic principles and the general framework of action for the management to undertake and fulfil its corporate social responsibility.

4. CORPORATE SOCIAL RESPONSIBILITY (CSR) COMMITTEE

Composition:

The Corporate Social Responsibility Committee of the company consists of three directors amongst whom one is Independent Directors. The Composition of the CSR Committee as follows:

| Sr. No. | Name of Chairman/ Member | Category | Designation |
|---------|---------------------------------|------------------------|-------------|
| 1. | Mrs.Poonam Sandeepkumar Agrawal | Executive Director | Member |
| 2. | Mrs. Bhoomika Aditya Gupta | Independent Director | Chairman |
| 3. | Mrs. Sarita Neeraj Aggarwal | Non-Executive Director | Member |

Meetings: The Committee shall hold meeting as and when required, to discuss various issues on implementation of the CSR Policy of the Company. The members would thrive to hold at least one meeting in a financial year.

Quorum: The quorum for a meeting of the Committee on CSR shall be one-third of its total strength (any fraction contained in that one-third being rounded off as one), or two members, whichever is higher.

Role of CSR Committee

- To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Companies Act 2013;
- To recommend the amount of expenditure to be incurred on the activities referred to in clause (a) in a financial year;
- To monitor the Corporate Social Responsibility Policy of the company from time to time.
- Any other matter/thing as may be considered expedient by the members in furtherance of and to comply with the CSR Policy of the Company.

The Board of Directors shall endeavor that the Company spends 2% of the average pre-tax net profits of the Company made during the 3 immediately preceding financial years in pursuance of its CSR Policy.

5. CSR BUDGET/CSR SPEND

For achieving its CSR objectives through implementation of meaningful and sustainable CSR programs, the Company will allocate 2% of its average net profits made during the 3 immediately preceding financial years as its Annual CSR Budget. The Annual CSR Budget shall be spent on activities laid down in this Policy.

The Company shall allocate the budget for CSR activities. The minimum budgeted amount for a financial year shall be 2% of the average net profit of three immediate preceding financial years. The Company may allocate more fund/amount than the amount prescribed under section 135 of the Companies Act, 2013, for the CSR activities for any financial year. The Committee shall calculate the total fund for the CSR activities and recommend to the Board for the approval. The Board shall approve the total fund to be utilized for CSR activity for respective financial year.

CSR expenditure shall include all expenditure including contribution to corpus for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the approved CSR activities.

6. CSR ACTIVITIES

Pursuant to Schedule VII of the Companies Act, 2013, the Committee has approved the following activities as "CSR Activities" to be undertaken under the CSR policy of the Company. The Board of Directors has reviewed the said activities and express its consent to the Committee to pursue the said activities under CSR policy of the Company under section 135 of the Companies Act, 2014, Schedule VII and other applicable rules, regulations, notifications etc., issued/to be issued from time to time.

Approved CSR Activities:

1. Promoting preventive healthcare and sanitation to the public;
2. Promoting education, including primary, secondary and higher secondary education, as well as special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
3. Projects, Activities, Programmes relating to conservation of natural resources including renewable energy sources;
4. Projects, Activities, Programmes relating to water conservation and maintaining quality of soil, air, and water;
5. Promoting Gender equality and empowerment of women.

6. Community Health- Innovation projects to meet local needs. Reaching out with basic health care to all (bridging the gap).
7. Sustainable livelihood Projects – Holding hands of all marginalized group to improve livelihood opportunity, thus improving their quality of life.
8. Rural Infrastructure Development- Need based quality infrastructure to improve quality of life.
9. Eradicating hunger, poverty & malnutrition, promoting preventive health care & sanitation & making available safe drinking water;
10. Reducing child mortality and improving maternal health by providing good hospital facilities and low cost medicines;
11. Employment enhancing vocational skills
12. Training to promote rural sports, nationally recognized sports, sports & Olympic sports;
13. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development & relief & welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities & women;
14. Contributions or funds provided to technology incubators located within academic institutions, which are approved by the Central Government; xiii. Rural development projects, etc
15. Activities related to promotion of road safety as suggested vide General Circular No. 21/2014 dated 18.06.2014 issued by Ministry of Corporate Affairs.

7. CSR EXPENDITURE

The CSR projects or programs or activities undertaken by the Company as per the Company's CSR Policy in India only, shall amount to CSR Expenditure in accordance with the provisions of sub-section (5) of section 135 of the Act.

The Company will prefer to take up projects for spending the amount earmarked for CSR at local areas and regions where the Company operates.

All expenses and contributions for CSR activities will be made after obtaining subsequently approval from the Chairman of the CSR Committee in the beginning of financial year, which would then be placed before the forthcoming CSR committee for noting and record. The expenses so incurred during the year shall be within the overall budget approved in the beginning of the year by the committee.

The detailed expenditure chart shall be got vetted by the committee at the end of the respective financial year.

8. IMPLEMENTATION PROCESS

- a. Identification studies by the Senior Management/ professional institutions/agencies to identify the CSR program in line with the Policy;
- b. Internal need assessment by cross functional teams at the local level;
- c. Receipt of proposals/requests from charitable institutions and NGOs;
- d. Suggestions from the Board of Directors/senior management level;
- e. Implementation of CSR program.

9. CSR PROGRAMME(S)

9.1 CSR programme(s) will be undertaken by various work centres i.e. Corporate office, units and other business places of the Company in India to the best possible extent within the defined ambit of the identified Project/ Program.

9.2 The time period/duration over which a particular program will be spread, will depend on its nature, extent of coverage and the intended impact of the program.

10. MONITORING AND FEEDBACK

- a. To ensure effective implementation of the CSR programs undertaken at each work centre, a monitoring mechanism will be put in place by the work centre head.
- b. The progress of CSR programs under implementation at work centre will be reported to corporate office on a monthly basis.
- c. The report on progress on the CSR program undertaken by the Company will be put forward to the CSR Committee with full details of cost incurred and results achieved on a regular basis.
- d. Work centres and zonal office will try to obtain feedback from beneficiaries about the programs implemented at the area.
- e. Appropriate documentation of the Company's CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis.
- f. CSR initiatives of the Company will be reported in the Annual Report of the Company & the Board's Report in compliance with Section 135 and rules made thereunder.

11. Reporting Framework

| Sr. No. | CSR Project or Activity Identified | Sector which the project is covered | Project or Programs 1) Local Areas, 2) Specify the state and district where projects or programs was undertaken | Budget (Project or Program) | Amount spent on Project or Program a) Direct Expenditure b) Overheads | Cumulative Expenditure | Amount Spent Direct or through Agency |
|---------|------------------------------------|-------------------------------------|---|-----------------------------|---|------------------------|---------------------------------------|
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11. DISCLOSURES

The Board's report, being a part of the Annual Report shall disclose the composition of the Corporate Social Responsibility Committee, the contents of such policy and the CSR initiatives undertaken. This CSR Policy shall also be placed on the website of the Company.