



GAMMON

GAMMON ENGINEERS AND CONTRACTORS PRIVATE LIMITED

[CIN: U45100MH2014PTC260191]

Regd. Office: 'Gammon House', Veer Savarkar Marg, Prabhadevi, Mumbai – 400025.

Website: www.gammonengineers.com Email: gecpl@gammonengineers.com

Tel: +91 22-6115 3000 Fax: 91 22-2430 0221

GAMMON ENGINEERS AND CONTRACTORS PRIVATE LIMITED

COPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1.0 SHORT TITLE AND DEFINITIONS

1.1 The "Act" Means the Companies Act, 2013.

1.2 "Corporate Social Responsibility" means and includes but 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.

1.3 The "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in Section 135 of the Act.

1.4 "CSR Policy" relates to the Activities to be undertaken by the Company as specified in Schedule VII to the Act and the expenditure thereon, excluding activities undertaken in pursuance of normal course of business of a Company.

1.5 "Net Profit" means the net profit of a company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following namely:-

- i. Any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
- ii. any dividend received from other companies in India, which are covered under and complying with the Provisions of section 135 of the Act:- Provided that net profit in respect of a financial year for which the relevant financial statements were prepared in accordance with the provisions of the Companies Act, 2013, shall not be required to be re-calculated in accordance with the provisions of the Act.

1.6 This policy shall apply to all CSR initiatives and projects taken up at the various sites and locations of GECPL, for the development and empowerment of deprived and underprivileged sections of the society.

2.0 CSR VISION

"To contribute to the socioeconomic development of the country by building stronger, developed, sustainable communities and to improve the quality of life of the people of the country."

3.0 OBJECTIVES OF THE CSR POLICY

This Policy shall be read in line with Section 135 of the Companies Act 2013, Companies (Corporate Social Responsibility Policy) Rules, 2014 and such other rules, regulations, circulars, and notifications (collectively referred hereinafter as Regulations) as may be applicable and as amended from time to time and will, inter-alia, provide for the following:

- Establishing a guideline for compliance with the provisions of Regulations to dedicate a percentage of Company's profits for social projects.
- Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.
- Creating opportunities for employees to participate in socially responsible initiatives.
- To undertake CSR projects largely in and around GECPL project sites and offices (any other needy area or backward district can be taken up irrespective of operations of the company).
- To generate through its CSR initiatives, a community goodwill for GECPL and help reinforce a positive and socially responsible image of GECPL as a corporate entity.

4.0 CSR COMMITTEE AND ITS FUNCTIONS

The CSR Committee presently comprises of 3 directors viz., Mr. Vimal Kaushik, Mr. Kasinathan Lakshmi Srinivasan and Mr. Maruti Jambagi as members. However, the Board has power to re-constitute the Committee as and when required from time to time. In the absence of the Chairman, the members of the Committee present at the meeting shall choose one amongst them to act as Chairman. The meetings of the Committee could be held at such periodic intervals as may be required. The quorum of the meetings shall be two members. The Company Secretary of the Company shall act as Secretary of the Committee.

The responsibilities of the CSR Committee include:-

- Formulating and recommending to the Board of Directors the CSR Policy.
- Identifying and recommending the CSR activities to be undertaken to the Board of Directors.

- Recommending the amount to be spent for the CSR activities.
- Undertaking all necessary steps to implement the CSR activities.
- Monitoring the CSR activities from time to time.
- The CSR Committee shall monitor the status of each project and receive the quarterly updates on all activities against the plans submitted and approved. The CSR Committee shall be responsible for managing the tasks to be implemented and providing feedback to the Board of Directors.

4.0 CSR ACTIVITIES TO BE UNDERTAKEN BY THE COMPANY

In accordance with the requirements of the Companies Act, 2013, the CSR activities to be undertaken by the Company under this Policy shall be the following:-

- I. eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- II. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- III. promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- IV. ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water;
- V. protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional and handicrafts;
- VI. measures for the benefit of armed forces veterans, war widows and their dependents;
- VII. training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- VIII. contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socioeconomic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- IX. contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

- X. rural development projects;
- XI. Slum Development - any area decided as such by the Central Government or any State Government or any other Competent Authority under any law for the time being in force;
- XII. Any other activity taken up by the Management at the discretion and which qualifies as a CSR activity under the Companies Act, 2013 and any amendment(s) thereof.

5.0 UNDERTAKING CSR ACTIVITIES

The Company shall undertake CSR activities, as approved by the CSR Committee, either on its own, or through a registered trust or registered society or through a company registered under Section 8 of the Companies Act, 2013, whether established by the Company, a subsidiary of the Company, an Associate Company or the Company or by a third party.

The company shall give preference to local areas and areas around where it operates for spending the amount earmarked for Corporate Social Responsibility activities. Further any activities undertaken at project sites of the Company which further the CSR objectives and which cover activities specified in Schedule VII of the Act shall constitute CSR activity.

6.0 CSR SPEND

The CSR Committee shall recommend the annual budget expenditure to the Board of Directors for its consideration and approval. The Company shall ensure to spend in each financial year at least 2% of the average Net Profit made during the three immediate preceding financial years. The expenditure towards Proposal Evaluation / Need Assessment / Baseline Survey, Mid-term Assessment, Impact Assessment, Documentation & Dissemination, Trainings for employees' sensitization towards CSR, Identification of CSR Activities / Projects, Monitoring / Coordination Activities, Fee of experts such as Consultants / designers /engineers (excluding departmental) etc. shall form part of CSR expenditure and would be covered under CSR Head.

The CSR Budget shall be non-lapsable. The unspent funds of the current financial year will be carried forward to the next financial year.

In case the Company is unable to spend the amount earmarked for the CSR activities in a financial year, the CSR Committee shall inform the Board of Directors of the Company specifying the reasons for not spending the amount, which in turn shall be reported by the Board of Directors of the Company in their report to the shareholders of the Company.

The surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the Company.

7.0 MONITORING AND EVALUATION

Monitoring and Evaluation are necessary for successful implementation of the project/activity. Timelines, budgetary expenditures and achievement of milestones can only be assessed by monitoring the projects/activities. The CSR Committee shall monitor all CSR activities undertaken by the Company as also various activities undertaken at various projects in furtherance of its CSR Objectives at such intervals as it deems necessary. The CSR Committee shall meet as often as it deems necessary and report the implementation, progress, CSR spend etc. to the Board at periodic intervals.

8.0 POWERS OF APPROVAL

The Board of Directors on the recommendations of CSR Committee will approve the CSR Policy for the Company and the same will be displayed on the Company's web-site. Board of Directors shall also ensure that the activities included in the CSR Policy of the Company are duly undertaken by the Company.

9.0 AMENDMENT TO THE CSR POLICY

The Board of Directors on its own and/or on the recommendation of the CSR Committee can amend this CSR Policy as and when deemed fit. Any or all provisions of CSR Policy would be subject to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.