

CORPORATE SOCIAL RESPONSIBILITY POLICY

I. SHORT TITLE:

This policy in relation to the Corporate Social Responsibility ("CSR") of Holani Consultants Private Limited is titled as the "CSR Policy" and shall include any alterations, amendments or modifications hereto from time to time.

II. BACKGROUND:

Corporate Social Responsibility (CSR) implies a concept, whereby companies decide voluntarily to contribute to a better society and a cleaner environment – a concept, whereby the companies integrate social and other useful concerns in their business operations for the betterment of their stakeholders and society in general in a voluntary way.

Corporate Social Responsibility (CSR) under Section 135 of Companies Act, 2013, read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, the Company is, inter alia, required to:

- (i) Constitute a Board Committee to formulate and recommend to the Board a Corporate Social Responsibility (CSR) Policy, recommend the amount of CSR expenditure and monitor the CSR activities of the Company from time to time.
- (ii) Ensure that the Company spends, in every financial year, at least two per cent of the average Net Profits before Tax (PBT) of the Company, made during the three immediately preceding financial years, in pursuance of its CSR Policy.

III. VISION STATEMENT AND APPLICABILITY:

- Corporate Social Responsibility is embedded in our global corporate strategy. Our vision is to improve both the environmental and social conditions throughout our working towards a common goal.
- The policy is framed in accordance with the rules and provisions of the Companies Act, 2013
- The provision of CSR applies to ensure that the company spends in every financial year at least 2% of its average net profits made during the immediately preceding three financial years as per its CSR policy under section 135(1) of the act.

IV. OBJECTIVE:

1. The objective of the company to evolve its relationship with society by way of social and economic contribution and by giving back to the society for the resources it used to flourish by adoption of appropriate business processes and strategies.
2. To prepare list of activities, programmers, and projects to be undertaken during the implementation year, specifying modalities of execution and implementation schedules for the same.

V. CSR COMMITTEE:

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- The Board of Directors will perform the functions of CSR Committee. The Board may invite other experts/invitees as per its requirement.
- The Board shall be responsible for:
 - (i)Formulating the CSR Policy, including the CSR Activities and their budgets as well as Recommendation of any subsequent change /modification to the CSR Policy;
 - (ii) Institute an implementation and monitoring mechanism for CSR Activities;
 - (iii)Periodically updating the Board on the Progress being made in the planned CSR Activities;
 - (iv)Providing a responsibility statement in Board's Report.

VI. RESPONSIBILITIES OF THE BOARD:

The Board shall:

- Approve the CSR Policy.
- Place the CSR Policy on the Company's website.
- Ensure implementation of the activities under CSR
- Ensure expenditure of requisite amount on CSR every year as per law.
- Disclose reasons for not spending the amount (if applicable) in the Annual Report to the Shareholders of the Company.
- Ensure that the funds so disbursed have been utilized for the purposes and in the manner as approved by Board.

VII. FOCUS AREA:

1. The Company will support programs and activities as mentioned under Schedule VII of the Companies Act, 2013 and also such other activities including but not limited to the following:

- Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation.
- promoting education, including special education.

2. Other Activities:

- promoting gender equality and empowering women;
- Reducing child mortality and improving maternal health;
- Ensuring Environment Sustainability;
- Employment enhancing vocational skills;
- Social business projects;
- Such other matters as may be prescribed by the Government from time to time.

VIII. CSR EXPENDITURE AND ALLOCATION:

The CSR spend by Holani Consultants Private Limited, through qualifying entities every financial year shall be as per the requirements of the Companies Act,2013. The entities in compliance with the provisions of the Companies Act and the CSR Rules, including notifications and clarifications issued.

The Board shall approve the allocation of CSR Expenditure on the CSR activities.

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IX. REPORTING

- 1.The Board shall maintain proper minutes of all its meetings.
- 2.The Board shall prepare an annual report on CSR with such information and particulars as may be required by the act and such Report shall be included in the Boards report annexed to the Financial Statements.
3. The Board will be responsible to ensure that the statutory requirements as may be prescribed from time to time under the Act and the CSR Rules are complied with.

X. AMENDMENT

The Board is empowered to amend or modify the CSR Policy. The Board may subject to compliance with applicable law, at any time approve or alter, amend or modify the CSR Policy, as it deems fit to comply with the statutory obligation to undertake the CSR Activities.

GENERAL

- Words and expressions used but not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, the CSR Rules made thereunder or in any amendment thereto.
- The Company reserves the right to modify, cancel, add, or amend any of these Rules.