

Document Status	For Approval	
	For Circulation	X

GPT INFRAPROJECTS LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Issue Date	Version	Approved By	Circulated By
14.05.2022	6	CSR Committee & Board of Directors	Company Secretary

CORPORATE SOCIAL RESPONSIBILITY POLICY
OF
GPT INFRAPROJECTS LIMITED

1. INTRODUCTION

- a. The Corporate Social Responsibility (CSR) Policy of the GPT Infraprojects Limited (GPT) is aligned with its overall commitment to maintaining the highest standards of business performance.
- b. The CSR commitment of GPT positions its social and environmental consciousness as an integral part of its business plan and its commitment to all its stakeholders including consumers, share holders, employees, local communities and the society at large.
- c. The policy has been formulated as *per* the provisions of section 135 of the Companies Act, 2013 (Act) read with Companies (Corporate Social Responsibility Policy) Rules, 2014 (Rules) and Companies (Corporate Social Responsibility Policy) Rules, 2021.

2. POLICY STATEMENT

The CSR Policy of GPT aims to achieve, consolidate and strengthen Good Corporate Governance including socially and environmentally responsible business practices that balance financial profit with social well being.

3. SCOPE AND APPROACH

- a. GPT is committed to the well being of the local communities and the society at large.
- b. The scope and approach of the CSR Policy of GPT is defined by the following considerations:
 - (i) GPT acknowledges that there are or can be **expected** and **unintended** outcomes and impact of its core business which is to manufacture Concrete Sleepers and do Civil Construction.
 - (ii) While the overall outcome of its work is a positive contribution to the economy and society at large, some of the impact could be negative in the short term.
 - (iii) Given the nature of its work the strongest impact of its activities is primarily on the environment and communities in the immediate vicinity of working activities.
- c. The **geographic scope** of GPT's CSR work includes:
 - (i) The immediate surroundings of its manufacturing units and Construction Sites.
 - (ii) The district, town or city as a whole where its activities are located.
 - (iii) The country as whole as part of GPT's contribution to national efforts towards social development of the communities at large.

4. STRATEGIES

The strategies for designing, implementing and monitoring the CSR activities of GPT are based on the existing good practice models in the country, sample activities suggested in the CSR Guidelines as well as the first hand experience of the GPT in implementing its CSR activities over the past years. These strategies will help in standardizing the CSR related processes, essential in the context of GPT which is spread across the country.

5. GOAL

The overall goal is to promote sustainable and inclusive development as a Responsible Corporate Citizen.

6. OBJECTIVES

This goal will be achieved through the following broad Objectives:

- (i) Eradicating hunger, poverty and malnutrition [promoting health care including preventive healthcare] and sanitation [including contribution to the Swachh Bharat Kosh set up by the Central Government for the promotion of 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 [including contribution to the Clean Ganga Fund set up by the Central Government for rejuvenation of river Ganga];
- (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 arts and handicrafts;
- (vi) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- (vii) Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- (viii) Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any

other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;

- (ix) Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), [Department of Biotechnology (DBT)], Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting sustainable development Goals (SDGs);
- (x) Rural development projects
- (xi) Slum area development
- (xii) Disaster management, including relief, rehabilitation and reconstruction activities.

However, following shall not be included in the CSR Activities:

- Any activities undertaken in pursuance of its normal course of business.
- any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
- Any contribution made by the company of any amount directly or indirectly to any political party Under Section 182 of the Act.
- activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
- activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- activities carried out for fulfillment of any other statutory obligations under any law in force in India;

Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

- Where a company spends an amount in excess of requirement provided under sub-section (5) of section 135, such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years subject to the conditions that - (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any (ii) the Board of the company shall pass a resolution to that effect.

The CSR projects or programs or activities undertaken by the company as per 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 areas where the Company operates. All expenses and contributions for CSR activities will be made after approval from the Chairman of the CSR committee, which would then be placed before the forthcoming CSR committee for noting and record. The Chairman will ensure that the expenses/contribution and donation will be in full compliance of the CSR Policy.

7. IMPLEMENTATION MECHANISM

7.1 The Board of Directors shall be responsible for implementation of CSR policy and for the purpose constitute a CSR Committee consisting of such members/director as required by Act & Rules.

7.2 The Board shall be responsible :-

- a. To ensure that at least 2% of average net profits of last 3 preceding years is spent on CSR activities every year as per the provision of the Act and Rules there under.
- b. To approve the CSR Policy after considering recommendations of CSR Committee.
- c. To mandatorily disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.
- d. To ensure that activities reflected in CSR policy are actually undertaken by company.
- e. If the company does not spend 2% of net profits as required, then until a fund is specified in Schedule VII for the purposes of subsection (5) and(6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act and also specify the reasons for not spending the amount in the Board's report. .
- f. The Board's Report shall include an annual report on CSR containing particulars specified in the rules.

The CSR committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely:-

- (a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- (b) the manner of execution of such projects or programmes as specified ;
- (c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- (d) the monitoring and reporting mechanism for the projects or programmes; and
- (e) the details of need and impact assessment, if any, for the projects undertaken by the company:

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

7.3 In term of sub-rule-1 of rule-4 of Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (Rule) :

The Board of a company may decide to undertake its CSR activities approved by the CSR Committee, through a company established under section 8 of the Act, or a registered public trust or a registered society registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Every entity, referred above, who intends to undertake any CSR activity, shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar.

7.4 It is proposed that all or a part of CSR Programme shall be implemented through a charitable trust registered under The Income Tax Act, 1961 namely GOVARDHAN FOUNDATION(Trust) having CSR Registration number CSR00002757 and having its principle office at GPT Centre, JC-25, Sector-III, Salt Lake, Kolkata-700106 by creating a “GILCSR Corpus” in the trust. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to CSR Committee. In all such matters, the interpretation & decision of the Committee shall be final.

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines issued by the Government from time to time.

The CSR Committee reserves the right to modify, add, or amend any of provisions of this Policy subject to approval of the Board.