



VISHVARAJ ENVIRONMENT LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

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Reviewed By

Name: Suresh Kumar Agiwal

Designation: Director

Approved By

Name: Arun Hanumandas Lakhani

Designation: Managing Director

Table of Contents

1. CSR Philosophy.....	3
2. CSR Vision	3
3. Functions of CSR Committee.....	3
4. Definitions	4
5. Thrust Area	6
6. implementation	7
7. Expenditure not covered or Recognized.....	7
8. Funding and allocation.....	8
9. Monitoring Mechanism.....	9
10. Reporting Format.....	9

1) CSR Policy & Philosophy

Vishvaraj Environment Limited (the “Company”) is committed to operate and grow its business in a socially responsible way with a vision to be an environment friendly corporate citizen. Vishvaraj Environment Limited has taken up various corporate social responsibility initiatives earlier and will continue to do so in future.

Constitution of a corporate social responsibility committee of the Board of Directors and formulation of a corporate social responsibility policy has become mandatory for Vishvaraj Environment Limited under Section 135 of the Act (as defined below). Accordingly, the Board (as defined below) has in its meeting held on 11th September 2019 constituted a CSR Committee (as defined below). Subsequently the Board in its meeting held on September 05, 2025 had noted the revised terms of reference of CSR committee. The CSR Committee has formulated and recommended to the Board this revised CSR Policy (as defined below) which encompasses its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs.

2) CSR Vision

Improve quality of life for all our communities through integrated and sustainable development in every possible way.

3) Functions of the CSR Committee

In terms of the Act, the CSR Committee is required to, *inter alia*, carry out the following functions:

- (a) 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 and the rules made thereunder and make any revisions therein as and when decided by the Board;
- (b) To identify corporate social responsibility policy partners and corporate social responsibility policy programmes;
- (c) To recommend the amount of expenditure to be incurred for the corporate social responsibility activities and the distribution of the same to various corporate social responsibility programmes undertaken by the Company;
- (d) To delegate responsibilities to the corporate social responsibility team and supervise proper execution of all delegated responsibilities;
- (e) To review and monitor the implementation of corporate social responsibility programmes and issuing necessary directions as required for proper

implementation and timely completion of corporate social responsibility programmes; and

- (f) To perform such other duties and functions as the Board may require the corporate social responsibility committee to undertake to promote the corporate social responsibility activities of the Company and exercise such other powers as may be conferred upon the CSR Committee in terms of the provisions of Section 135 of the Companies Act.”

4) Definitions

In this CSR Policy, unless the context otherwise requires;

- a) **“Act”** shall mean the Companies Act, 2013, including any modifications, amendments or re-enactment thereof.
- b) **“Agency” or “Agencies”** shall mean any Trust or registered society or a company established under Section 8 of the Act by the Company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary company of such other company, or otherwise; provided that (i) if such Trust, society or company is not established by the Company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, it shall have an established track record of three years in undertaking programmes and projects that are similar to the programmes and projects that are proposed to be undertaken by the Company pursuant to this CSR Policy and (ii) the Company has specified the project or programmes to be undertaken through such entities, the modalities of utilization of funds on such projects and programmes and the monitoring and reporting mechanism; provided further that the Trust or registered society or Section 8 company has been created exclusively for undertaking CSR Activities or where the corpus is created exclusively for a purpose directly relatable to a subject covered in Schedule VII of the Act.
- c) **“Annual Plan”** shall mean the annual planned CSR Expenditure as approved by the Board on the recommendation of the CSR Committee, for a particular Financial Year.
- d) **“Approved Budget”** shall mean the total budget as approved by the Board of the Company which is to be spent or utilized for CSR Activities.
- e) **“Average Net Profits”** shall mean the average net profits of the Company as defined under the Act and the Rules based on which a specific percentage for CSR Expenditure has to be calculated.
- f) **“Board”** shall mean the Board of Directors of the Company.
- g) **“Company”** shall mean Vishvaraj Environment Limited.

- h) **"CSR Activities"** shall mean all the corporate social responsibility activities/ programmes / initiatives of the Company, either ongoing or new, which are in conformity with the activities specified in Schedule VII to the Act (as amended from time to time) in and around the registered office, corporate office, sales offices, warehouses of the Company, projects, its subsidiaries and associates wherever located, as recommended by the CSR Committee and approved by the Board.
- i) **"CSR Committee"** shall mean the Corporate Social Responsibility Committee as constituted or reconstituted by the Board from time to time in accordance with the Act and the Rules, comprising of three or more Directors, out of which, at least one director shall be an independent director.
- j) **CSR Expenditure"** shall mean all expenditure on CSR Activities as recommended by the CSR Committee and approved by the Board including the following;
- i) Contributions to CSR Activities which shall be implemented and/ or executed by the Company; and
 - ii) Contributions to CSR Activities which shall be implemented through any Agency established / registered to carry on the CSR Activities and in accordance with the Rules and any circulars issued by the Ministry of Corporate Affairs.
- k) **"CSR Officer"** shall mean a person engaged by the Company to assist the CSR Committee to implement the CSR Activities envisaged under the CSR Policy.
- l) **"CSR Policy"** shall mean this corporate social responsibility policy of the Company.
- m) **"Financial Year"** shall mean the period beginning from April 1 of every year to March 31 of the succeeding year.
- n) **"Group Companies"** shall mean holding companies, subsidiaries and associate companies of the Company.
- o) **"Rules"** shall mean the Companies (Corporate Social Responsibility Policy) Rules, 2014, including any modifications, amendments or re-enactment thereof.
- p) **"Thrust Areas"** shall mean the area so activities described as such in this CSR Policy, as amended by the CSR Committee, from time to time.
- q) **"Trust"** shall mean a trust formed and registered under the Indian Trust Act, 1882 and under the Income Tax Act, 1961 for those states where registration of trust is not mandatory.

Words and expressions used and not defined in this CSR Policy shall have the same meanings respectively assigned to them in the Act and / or the Rules.

5) Thrust Areas

While we strive to undertake all or any suitable activity as specified in Schedule VII to the Act, currently, we focus to support and implement the following activities as our Thrust Areas:

(i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care 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 centers 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, agroforestry, 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 art 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 recognised sports, Paralympic 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 govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;

(ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), 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.

Explanation.- For the purposes of this item, the term 'slum area' shall mean any area declared 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) Disaster management, including relief, rehabilitation and reconstruction activities.

6) Implementation

Each year, the CSR Committee will identify the CSR Activities including the Thrust Areas, Approved Budget, CSR Expenditure and implementation schedule, etc.

The CSR Activities will be carried out in and around the registered office, corporate office, sales offices / warehouses of the Company, projects and its Group Companies. However, this shall not bar the Company from pursuing its CSR Activities in any other areas in accordance with the Act and the Rules. The CSR Activities will be carried out / implemented either directly by the Company itself or, through Agencies established / registered to carry on the CSR Activities as defined under and in accordance with the Rules and any circular issued by the Ministry of Corporate Affairs.

7) Expenditure not covered or recognized

The following contributions shall not be considered as CSR Expenditure;

- a) Contributions of any amount, whether directly or indirectly, to any political party or any person associated with a political party.
- b) Amount spent, whether directly or indirectly, for the benefit of employees of the Company, its Group Companies and their families.
- c) Expenses incurred by the Company for the fulfillment of obligations under any act/statute or regulations (such as labor laws).

- d) Expenses incurred by the Company for one off events such as marathons/ awards /charitable contribution / advertisement / sponsorships of TV programs etc.
- e) Expenses incurred by the Company for activities undertaken in pursuance of its normal course of business.
- f) Other contributions / expenses not recognized under the Act / Rules as amended or modified, from time to time.

8) Funding and allocation

Following is the mode of funding and allocation of area-wise planned expenditure for the CSR Activities.

- a) The Company shall, in every Financial Year, contribute as statutory minimum limit of at least two per cent (2%) of its Average Net Profits made during three immediately preceding Financial Years for the CSR Expenditure.
- b) In the absence of Average Net Profits during three immediately preceding Financial Years, the Company end favors to spend such feasible amount as it may decide.
- c) The CSR Committee shall prepare its Annual Plan, for a Financial Year, for the CSR Activities including the Thrust Areas and manner of implementation etc., and submit the same for approval of the Board in the following format:

S. No.	CSR Activities / Thrust Areas	Proposed Schedule of Implementation	Annual Budget (Rs.)	% of allocation

- d) The Company shall endeavor to spend the entire amount of statutory minimum contribution limit in a Financial Year. In the event, the Company is unable to spend such amount in any given Financial Year, the Board shall specify the reasons for the same in its report to the shareholders made under Section 134(3)(o) of the Act. and, unless the unspent amount relates to any ongoing project referred to in sub-section (6) of section 135, transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year
- e) If the company spends an amount in excess of the requirements provided under section 135, the company may set off such excess amount against the requirement to spend under section 135 for such number of succeeding financial years and in such manner as may be prescribed under the Act.
- f) Any surplus arising out of CSR Activities undertaken by the Company shall not form part of the business profits of the Company.

9) Monitoring mechanism

- a) The CSR Officer of the Company will coordinate / review the implementation of CSR Activities at various areas and report to the Board through the CSR Committee from time to time. The CSR Committee shall meet at least once in a year to monitor the implementation of the CSR Policy and the CSR Activities. The Committee shall ensure that the CSR Policy, as amended from time to time, is displayed on the Company's website and disclosed in the Board's report.
- b) The CSR Committee shall on an annual basis place before the Board its annual report on CSR Activities as per the format specified under paragraph 10 below. The Board shall include in its report to the shareholders, the annual report on CSR Activities as per the format specified under the Rules.
- c) The company secretary of the Company shall assist the CSR Committee and the Board in connection with the performance of their respective duties under the CSR Policy and under any regulations governing the CSR Activities, as amended from time to time.

10) Reporting format

Periodic reporting on the CSR Activities, execution modalities, implementation schedules etc., to the CSR Committee shall be in the following format, which may be amended by the CSR Committee from time to time.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
S. No.	CSR project or activity identified	Sector in which the Project is covered	Projects or programs (1) Local area or other (2) Specify the State and district where projects or programs were undertaken	Amount outlay (budget) (project or program -wise)	Amount spent on the projects or programs (Please specify: (1) Direct expenditure on projects Or programs; (2)Overheads	Cumulative expenditure up to the reporting period	Amount spent: Director through implementing agency (if through implementing agency, give details of such agency)
1							
2							
	TOTAL						
