

LCC PROJECTS PRIVATE LIMITED
(CIN : U45500GJ2017PTC100301)

Corporate Social Responsibility
Policies

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1. Concept

1.1 Background

LCC Projects Private Limited (herein after referred to as “LCC” or “Company”) aims to form a corporate self-regulatory mechanism whereby its integrated business model monitors and ensures its active compliance with the spirit of the law, ethical standards and international norms.

LCC operates in a manner that not just continues to generate an attractive return for shareholders, but also through its continuous efforts make positive impact on the society in general which includes consumers, employees, investors, communities, and others.

1.2 Title & Scope

- a) This policy shall be called ‘LCC Corporate Social Responsibility Policy’ or ‘LCC CSR Policy’. It outlines the Company’s philosophy and responsibility as a corporate citizen of India and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community, in and around its area of operations and other parts of the country.
- b) This policy is in compliance of Section 135 of the Companies Act, 2013.
- c) Companies (Corporate Social Responsibility Policy) Rules, 2014 (the Rules).
- d) This policy shall be effective from April1, 2018.

1.3 CSR Vision Statement and Guiding Principles

LCC is committed to contribute towards sustainable development that meets the need of present as well as future stakeholders. The Company shall integrate and follow responsible practices into its business strategies and its operations, to achieve the following three Goals:

- Economic Prosperity;
- Social Development; and
- Environmental Integrity.

Towards this commitment, the Company shall:

- a) Build a sustainable organisation that effectively balances financial strengths with social responsibilities.
- b) Deliver sustainable top-line and bottom-line growth while maintaining the highest corporate governance standards.
- c) Reduce its environmental footprint by investing in eco-friendly technologies, methods and practices.
- d) Build lasting social capital through programs, activities and projects in the education, vocational domains, healthcare, and other social welfare programs and activities for the community residing in the area of its operations and other places in India.
- e) Organise at regular intervals employee education and development programs so as to develop their knowledge and skill sets, so that they realize their true potential and drive the Company's growth.
- f) Promote inclusive growth and equal opportunity by remaining a caste, religion and gender neutral organization.

2. RESOURCES

For achieving its CSR objectives, LCC shall endeavour to allocate the following as its Annual corpus.

- 2% of the average Net Profit made by the Company during immediately preceding three Financial Years as prescribed under the Companies Act, 2013 and the Rules;
- Any income arising there from.
- Surplus arising out of CSR activities carried out by the company.

It is clarified that surplus arising out of CSR projects/programs shall not form part of business profits of the Company.

3. CSR ACTIVITIES

The CSR programs, projects and activities to be undertaken by the Company may relate to one or more activities listed in Schedule VII to the Companies Act, 2013 which is reproduced herein below:

- a. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- b. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently able and livelihood enhancement projects.

- c. 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.
- d. 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.
- e. Protection of national heritage, art & culture including restoration of buildings & sites of historical importance & works of art; setting up public libraries; promotion & development of traditional arts & handicrafts.
- f. Measures for the benefit of armed forces veterans, war widows & their dependents;
- g. Training to promote rural sports, nationally recognized sports, sports & Olympic sports;
- h. 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;
- i. Contributions or funds provided to technology incubators located within academic institutions, which are approved by the Central Government;
- j. Rural development projects, etc

k. 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.

The Above list is illustrative not exhaustive. All activities under the CSR activities should be environment friendly and socially acceptable to the local people and Society. Contribution towards C.M relief fund shall be a part of CSR activities above 2% of Net profit other than the activities mentioned above.

4. IMPLEMENTATION

4.1 Manner of Implementation

CSR programs, projects or activities, will be implemented through one or more of the following methods:

- a) Direct Method: The Company will strive to implement the aforesaid CSR activities on its own to the extent possible
- b) Indirectly: By Collaborating with various organisations, which are registered as a Trust or a section 8 company under the Companies Act, 2013 or Society or NGOs or any other form of entity incorporated in India that specialise in the aforesaid activities.
- c) By Contributions:
 - Contribution to various funds which are aligned with our CSR Activities; e.g. Prime Minister's National Relief Fund.
 - Any other fund set up by the Central Government for socio-economic development and relief; for the welfare of

Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.

- Collaborating or pooling resources with other companies to undertake aforesaid CSR activities.

LCC shall give preference to the local area and areas around it where it operates, for spending the amount.

The allocated CSR budget or Corpus will be utilized for CSR activities which are not:

- Exclusively for the benefit of employees of the Company or their family members;
- Undertaken in pursuance of normal course of business of the Company.

4.2 Powers for Approval

- 1) Corporate Social Responsibility Committee (CSR Committee) of the Board shall formulate and recommend to the Board a CSR policy of the Company for a Financial Year including the amount of expenditure to be incurred on CSR programs, projects and activities.
- 2) The Board shall, after taking into account the recommendations made by the CSR Committee, consider and approve the CSR Policy and CSR programs, projects and activities as it may consider appropriate. And implementation of the programs, projects or activities shall be made by CSR committee or as may be delegated by the CSR committee.
- 3) The Board of Directors of the Company shall ensure that Company spends the requisite amounts specified under the Companies Act, 2013 on CSR activities failing which it shall specify in its report the reason for not spending the amount.

- 4) The Board or CSR Committee shall delegate necessary powers for execution and implementation of the CSR Policy. The delegation shall also include powers for meeting the requirements arising out of immediate & urgent situations.

5. MONITORING

To ensure effective implementation of the CSR programmes, the Company shall put in place, suitable monitoring mechanism.

- In case a project or programme is to be implemented through implementing agency, the Progress is monitored through periodical progress reports with supporting documents pertaining to the expenses incurred on different heads.
- CSR Committee of the Company shall periodically monitor the progress of CSR projects, programs and activities incorporated in the CSR Policy.
- CSR Policy will be displayed on the Company's corporate website <https://lccprojects.com/>
- An annual report on CSR containing the particulars as prescribed under the Companies (Corporate Social responsibility Policy) Rules, 2014 shall form part of Annual Report of the Company.

6. GENERAL

In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference is to be made to CSR Committee. In such matters, the interpretation and decision of the Committee shall be final.

Any or all provisions of the CSR policy may be revised/modified/amended by the CSR Committee at such intervals as it

may deem fit subject to approval of Board or in accordance with the guidelines on the subject as may be issued from Government, from time to time.