

**POLICY FOR CORPORATE SOCIAL RESPONSIBILITY
OF
GOLDCREST CORPORATION LIMITED**

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I. SHORT TITLE:

This policy in relation to the Corporate Social Responsibility (**“CSR”**) of **Goldcrest Corporation Limited** is titled as the **“CSR Policy”**.

CSR Policy has been framed in accordance with the applicable provisions of the Companies Act, 2013 (**“Act”**) and the rules issued thereunder.

Notwithstanding anything to the contrary contained in this CSR Policy but subject to applicable law, in the event that the Company does not fall under the thresholds set out under Section 135(1) of the Act for three consecutive financial years, it shall not be required to:

- (i) comply with the provisions of this CSR Policy and the provisions of the Act; and
- (ii) spend towards CSR as defined in the Act and this CSR Policy.

till such time as it again meets the criteria specified in Section 135(1) of the Act.

II. PURPOSE:

The purpose of this document is to outline the policies and procedures for CSR for Goldcrest Corporation Limited (referred to as **“the Company”**).

III. OBJECTIVE, MISSION AND VISION:

CSR policy has been formulated with the following Objectives, Mission and Vision:

- The Company believes in growing together with the community and that the progress of the local community should go hand-in-hand with the growth of the Company. The Company therefore intends to concentrate on the communities immediately around its areas of operation and support their upliftment by giving back to the community and addressing their needs.
- The Company believes in delivering support to meet the needs of the community and sustainable development.
- This CSR Policy sets out our commitment to ensuring that our activities extend beyond business and include initiatives and endeavors for the benefit and development of the community and society.

IV. DEFINITION AND INTERPRETATION

1. **“Board”** means the Board of Directors of the Company.
2. **“CSR Activities”** means such programs and projects as may be approved by the Board in terms of this CSR Policy and may include any activities as specified under schedule VII of the Act.
3. **“CSR Rules”** means the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.
4. **“CSR Expenditure”** means the amount to be incurred on the CSR Activities in India in terms of the Act and the CSR Rules as approved by the Board from time to time.
5. **“Director”** means a member of the Board of the Company.
6. **“Net Profit”** means net profit in accordance with the provisions of section 198 of the Act and as per its financial statement with the applicable provisions of the Act, but doesn't include:
 - a. Any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
 - b. Any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act.
7. **“Society”** means a society registered under the Societies Registration Act, 1860 or any other applicable law in India.
8. **“Trust”** means a public charitable trust registered under the Indian Trusts Act, 1882 or any other applicable law in India.
9. Any term not defined above, shall have the meaning assigned to it under the Act or the CSR Rules.

V. APPROACH AND DIRECTION OF THE BOARD ALONG WITH GUIDELINES FOR SELECTION, IMPLEMENTATION AND MONITORING OF ACTIVITIES:

1. **The Board shall be responsible for:**

- Implementing the mandate of the CSR Policy and shall ensure that the CSR Activities are carried out in accordance with the CSR Policy read with the Act and CSR Rules and the annual action plan to be formulated from time to time.
- Approve this policy, causes that the Company proposes to support, programs to be undertaken by the Company, modalities of operation and the budget for the activities including monitoring the CSR Policy of the Company on a regular basis, ensuring that it is updated for any change or enhancement in scope.

- Ensure that CSR activities included by a Company in its Corporate Social Responsibility Policy are related to the activities included in Schedule VII of the Act.
 - Determine the amount of expenditure to be incurred on the CSR activities.
 - Ensure that the Company spends, a required amount as per section 135 of the Act.
 - Formulate annual action plan in pursuance of this CSR policy in accordance with the applicable law, and inclusive of the following items:
 - 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;
 - c) the modalities of utilisation of funds and implementation schedules for the projects or programmes as may be mutually agreed between the Company and Implementing Agency, in case the amount spend through Implementing Agency;
 - d) monitoring and reporting mechanism for the projects or programmes; and
 - e) details of need and impact assessment, if any require under the provisions of the Act, for the projects undertaken by the company.
 - The Board may alter such plan at any time during the financial year, based on the reasonable justification to that effect.
 - If applicable, the Board's Report issued under clause (o) of sub-section (3) of section 134 shall include an annual report on CSR containing particulars specified in Annexure to the CSR Rules.
 - If the Company fails to spend such amount, specify the reasons for not spending the amount in its annual report, if any due to the events which are beyond the control of the Company e.g. force majeure events such as floods, earthquake, act of god, pandemic, epidemic, lockdown etc. due to which the necessary amount may not be spent by the Company.
2. **Mode of Implementation:** The CSR Activities may be undertaken by the Company directly or through a company established under section 8 of the Act or a registered public Trust or a registered Society registered under Income Tax Act 1961 (having an established track record of at least three years in undertaking similar activities) or established by the Central Government or the State Government or under an Act of Parliament or a State Legislature, by appointing as ***“Implementation Agency”*** being duly registered and having a unique CSR Registration Number, either singly or along with any other Company in accordance with the provisions of the Act and rules made thereunder.

3. The Company shall conduct due diligence prior to selection of an entity as its Implementation Agency, to inter alia verify the credentials and ensure that the proposed Implementation Agency is eligible and capable to be appointed as such.
4. The Board of the Company shall satisfy itself that the funds so disbursed have been utilised for the purpose and the manner as approved by it and the Chief Financial Officer or person responsible for financial management in the Company shall certify the same.

All questions of interpretation or discrepancies which shall arise under, or as a result of, or pursuant to, or in connection with the implementation of this CSR Policy or any initiative or activities undertaken by the Company in terms of this CSR Policy, shall be attended / resolved by the Board and the final decision/determination/ interpretation shall rest with them.

VI. CSR EXPENDITURE

1. The Company shall spend at least 2% (two percent) of average Net Profit of the Company made during the three immediately preceding financial years in accordance with the Act and the CSR Rules and this CSR Policy.
2. The Board shall approve the manner in which the CSR Expenditure shall be incurred in a year, in accordance with the Act and the CSR Rules and this CSR Policy.
3. The Board will sanction the CSR Expenditure and will be taking steps to ensure that the amount for the CSR Expenditure is available to the Company or Implementation Agency for application towards the CSR Activities.
4. Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company and may only be re-allocated to the CSR Activities being undertaken in terms of this CSR Policy and the annual action plan for the financial year in which such surplus has arisen.
5. In order to count towards CSR Expenditure, CSR Activities must be undertaken in compliance with the applicable laws and shall not include the following:
 - (i) activities undertaken in pursuance of normal course of business of the Company,
 - (ii) 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;
 - (iii) contribution of any amount directly or indirectly to any political party under Section 182 of the Act;
 - (iv) activities benefitting employees of the Company as defined in clause (k) of Section 2 of the Code on Wages, 2019 (29 of 2019);
 - (v) activities supported on sponsorship basis for deriving marketing benefits for its

- products or services; and
 - (vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India;
 - (vii) Other Activities as may be specified by Government of India or its ministry(ies) from time to time.
6. The Board shall ensure that the administrative overheads shall not exceed, limit specified by the Act, of total CSR expenditure of the Company for that financial year.

VII. CSR ACTIVITIES

1. The Board shall ensure that the CSR Activities that are undertaken by the Company should be within the scope of the following activities:
- (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, woman, 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 back ward 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 all; setting up public libraries; promotion and development of traditional arts and handicrafts;
 - (vi) Measures for the benefit of armed forces veterans, war windows 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, 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 Government for social-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- (ix) 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 contributions to public funded Universities; Indian Institute of Technology (IIT's); 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 purpose of this item, the item 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under law for the time being in force;

- (xii) Disaster management including relief, rehabilitation and reconstruction activities; and
- (xiii) Any other project as may be specified under Schedule VII of the Companies Act, 2013, from time to time.**

2. The CSR Activities will be carried out in a manner that the preference is to undertake the CSR Activities in and around the local areas where the Company operates.
3. The Board shall ensure that appropriate designated staff or personnel provide adequate assistance (viz. data collection, survey, quotations and costs involved etc.) to enable it to make necessary approval by the Board. For this purpose, the Board may also approach external consultants for necessary assistance as it may deem fit at such costs as may be approved by the Board.
4. The following details of any CSR Activities to be undertaken by the Company may be

presented to the Board:

- (i) The list of CSR projects or programmes to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - (ii) The objectives and expected results of the CSR Activity;
 - (iii) The relevant sector and the nature of the CSR Activity;
 - (iv) The focus area/ location for implementation of the CSR Activity;
 - (v) The modalities of utilisation of funds and amount to be allocated towards the CSR Activity;
 - (vi) The implementation schedules for the projects or programmes with indicative timelines for completion of the CSR Activity;
 - (vii) The manner of execution - whether the CSR Activity should be undertaken by the Implementation Agency or in collaboration with any other company;
 - (viii) Monitoring and reporting mechanism;
 - (ix) details of need and impact assessment, if any, for the projects undertaken by the company; and
 - (x) Such other details as it may deem necessary.
5. In case any of the CSR Activities to be undertaken are anticipated to be long term i.e. an ongoing project being of a term of 3 (three) years excluding the financial year in which it was commenced, then a detailed estimate on implementation schedule or milestones should be submitted to the Board.

VIII. MONITORING PROCESS

1. To ensure that the objectives of CSR Policy are being met in an efficient and effective manner, the utilisation of the amount sanctioned towards CSR Activities should be reported by the Implementation Agency to the Board on a periodic basis in such manner as the Board may direct.
2. For the purposes of monitoring, the Authorised person of the Company may visit the sites or places to review CSR project / programmes and carry out inspections as recommended by the Board from time to time.
3. Upon receipt of such progress report by the Implementation Agency, the Board may review and deliberate upon such reports and provide such inputs or recommendations, as it may deem necessary.

IX. REPORTING AND RECORD KEEPING

Based on the applicability, the Board's Report of the Company shall include an annual report on CSR containing particulars as specified by the Act and the CSR Rules and as amended from time to time.

The impact assessment report (if applicable) shall be placed before the Board and shall also be annexed to the annual report on CSR.

If the Company undertakes impact assessment it may book the expenditure towards CSR for that financial year, which shall not exceed five percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is less.

The Company shall disclose CSR Policy and projects approved by the Board on its website.

This policy shall, overall, be governed by Companies (Corporate Social Responsibility Policy) Rules, 2014 as may be amended from time to time.

X. CSR BUDGET:

The Company shall spend in every financial year, at least 2% of the average Net Profit of the Company made during the 3 immediately preceding financial years. The total budget for the CSR Projects will be decided by the Board.

XI. AMENDMENT

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