



CORPORATE SOCIAL RESPONSIBILITY POLICY

INTRODUCTION

Experion is a 100% FDI funded real estate developer backed by Experion Holdings Pte. Ltd., Singapore, the real estate investing arm of AT Holdings group of companies. Other businesses of AT Holdings include Construction, Oil & Gas, Renewable Energy and Asset Management.

With substantial Development Rights across various locations in India, Experion is developing townships, group-housing projects, commercial landmarks, organised retail destinations, hotels and resorts across India.

POLICY STATEMENT:

This Corporate Social Responsibility Policy ("CSR Policy") aims to define and establish the Company's Policy framework towards Corporate Social Responsibility ("CSR").

The CSR Policy shall be implemented in accordance with the provisions of Section 135 of the Act and the Rules made thereunder. It shall apply to all the Corporate Social Responsibilities activities undertaken by the Company in India as per Schedule VII to the Act and any amendments or modifications made thereto.

CSR COMMITTEE:

The Chairman and Members of the Committee are as follows:

Serial No.	Name	Chairman / Member
1	Mr Nagaraju Routhu	Chairman
2	Mr Sanjay Bakliwal	Member
3	Mr. Suneet Puri	Member

The Committee will meet at least twice in a year to discuss and review CSR activities and Policy. A quorum of two members is required to be present for the proceedings to take place. Such other meetings of the Committee can be convened as and when deemed appropriate.

The Committee may invite such other executive(s)/employees of the Company, professionals, experts and outsiders with relevant experience, as it may consider appropriate in its sole discretion, whether on permanent basis or temporarily, to advise the Committee on the various CSR activities being undertaken/ to be undertaken by the Company.

CSR ACTIVITIES TO BE UNDERTAKEN BY CSR COMMITTEE:

The scope of activities to be undertaken by CSR Committee of the Company will, inter-alia, include the following:

- i. Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promoting 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 recognised 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 Schedule Castes, the Schedule 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 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;

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.

EXCLUSIONS FROM THE CSR ACTIVITIES

The Corporate Social Responsibilities activities shall not include;

- activities undertaken in pursuance of normal course of business of the Company;
- 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;
- contribution 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 Section 2(k) of the Code on Wages, 2019;
- activities supported by the Company on sponsorship basis for deriving marketing benefits for its products

or services; and

- activities carried out for fulfilment of any other statutory obligations under any law in force in India.

IMPLEMENTATION OF THE CSR ACTIVITIES

The CSR activities identified by the CSR Committee and approved by the Board shall be implemented in a project mode with proper stages of execution through planned processes, measurable targets, mobilization and allocation of budgets and prescribed timelines.

Every Activity which the Company is undertaking should involve assigning of responsibility, authorisation and accountability.

CSR ANNUAL SPEND

The CSR Annual spend for a financial year shall include –

- (a) at least 2% of the average Net Profits of the Company made during three immediately preceding financial years;
- (b) any income arising there from;
- (c) surplus arising out of Corporate Social Responsibilities activities; and
- (d) any contribution specifically received for Corporate Social Responsibilities activities.

Further, it is clarified that any surplus arising out of Corporate Social Responsibilities activities shall not form part of the business profits.

The Board shall ensure that the Administrative Overheads shall not exceed 5% of total CSR expenditure of the Company for the financial year.

In case, the Company spends an amount in excess of requirement provided Section 135(5) of the Act, such excess amount may be set-off against the requirement to spend Section 135(5) of the Act up to an immediate succeeding three financial years provided the same has been approved by the Board and passed a resolution to that effect and the excess amount available for set-off shall not include the surplus arising out of the CSR activities.

In case, the Company fails to spend the prescribed CSR amount in any financial year, the Board shall, in its report under Section 134(3)(o), specify the reasons for not spending the amount and, unless the unspent amount relates to any Ongoing Project, transfer such unspent amount to a Fund specified in Schedule VII to the Act, within a period of six months of the expiry of the financial year.

Further, any amount remaining unspent under Section 135(5) of the Act, pursuant to any Ongoing Project of the Company, fulfilling such conditions as may be prescribed, shall be transferred by the Company within a period of thirty days from the end of the financial year to a special account for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the Company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the Company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

Until a fund is specified in Schedule VII, the unspent CSR amount, if any, shall be transferred by the Company to any fund included in Schedule VII to the Act.

Tax treatment of CSR spend will be in accordance with the Income Tax Act, 1961 as may be notified by Central Board of Direct Taxes (CBDT).

The overall amount to be committed towards CSR will be approved by the Board upon the recommendation of the

CSR Committee.

ANNUAL ACTION PLAN

The CSR Committee shall formulate and recommend to the Board, an Annual Action Plan. The details of each of the CSR activities/ programmes undertaken during a financial year shall be set-out in the Annual Action Plan. The Board may alter the Annual Action Plan at any time during a financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

The Company shall give preference to the local area and areas around it where it operates, for undertaking/ implementing/ executing/ collaborating for CSR activities.

MONITORING MECHANISM

The CSR Committee will ensure a transparent monitoring mechanism for ensuring effective implementation of the CSR activities proposed to be undertaken by the Company.

The CSR Committee will ensure that the CSR activities are undertaken in compliance with this CSR Policy and in a project or programme mode with clearly defined project deliverables, implementation schedules, processes and budgets as given in the Annual Action Plan.

The CSR Committee shall also apprise to the Board of Directors about the progress of CSR project/ programmes/ activities including any expenditure incurred through implementing agency(ies) till the allocated budget is fully utilised.

In case of the Ongoing Project(s), the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

The Board shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer shall certify to the effect.

IMPACT ASSESMENT

In case, the Company has average CSR obligation of ` ten crore or more in pursuance of Section 135(5) of the Act, in the three immediately preceding financial years, it shall undertake impact assessment, through an independent agency, of its CSR projects having outlays of ` one crore or more, and which have been completed not less than one year before undertaking the impact study.

The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.

In order to undertake impact assessment, the Company may incur an amount up to 5% of the total CSR expenditure for that financial year or ` fifty lakh, whichever is less and the same shall be considered as CSR expenditure for that financial year.

REPORTING

The CSR Committee shall prepare an annual report on CSR, in the format prescribed under the Act and such report shall be included in the Board's report annexed to the financial statements. The report shall be signed by the Chairman of the CSR Committee and Managing Director/Director of the Company.

The Company shall host the contents of the CSR Policy on its website, if any, in such manner as may be prescribed.

The CSR Committee will review the philanthropic activities of the Company and will provide progress update to the Board of Directors at such intervals as deemed fit.

AMENDMENTS/MODIFICATION:

This Policy including Annual Action Plan can be amended by the Board of Directors on its own and/or as per the recommendations of CSR Committee, as and when required as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Regulations on the subject as may be issued from relevant statutory authorities, from time to time.

Where the CSR Policy including Annual Action Plan is in variance with the requirements of the Act, the provisions of the Act shall prevail.