

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)

YOGAYATAN GG INFRA PRIVATE LIMITED

(CIN: U45203MH2022PTC377842)

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Mumbai – 400020, Maharashtra

I. Preamble

This CSR Policy is formulated and adopted in compliance with the provisions of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014 and has been approved by the Board of Directors of Yogayatan GG Infra Private Limited.

The purpose of Yogayatan GG Infra Private Limited (“YGGIPL”) Corporate Social Responsibility (CSR) Policy is to devise an appropriate strategy and focus for its CSR initiatives and lay down the broad principles on the basis of which it will fulfill its CSR objectives.

This policy shall contain the approach and direction given by the Board of Directors of the Company, after taking into account the recommendations of its CSR Committee, and include guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

This policy shall apply to all CSR initiatives and activities taken up at various locations of the Company, preferably in the vicinity where the Company carries out its business operations and for the benefit of different segments of the society.

II. Definitions

- a) **“Act”** means the Companies Act 2013 and the rules made thereunder, including any modifications, amendments or re-enactment thereof.
- b) **“Administrative Overheads”** means the expenses incurred by the Company for ‘general management and administration’ of CSR functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular CSR project or programme.
- c) **“Board”** means the Board of Directors of the Company.
- d) **“Company”** shall mean Yogayatan GG Infra Private Limited and wherever the context requires, shall signify the Company acting through its Board.
- e) **“CSR Committee”** shall mean the Corporate Social Responsibility Committee constituted by the Board of the Company in accordance with the Act.
- f) **“CSR Activities”** means projects/programs/initiatives, instituted in India, either new or on-going, to be undertaken by Company in India, pursuant to Section 135 of the Companies Act 2013 along with CSR Rules or such other provisions as may be applicable from time to time as may be amended.
- g) **“CSR Annual Plan”** shall mean the annual plan detailing the CSR expenditure for the year.

- h) “CSR Policy”** means the policy of the Company which relates to the activities to be undertaken by the Company as specified in Schedule VII of the Act and the expenditure thereon.
- i) “Financial Year”** shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.
- j) “Ongoing Project”** means a multi-year project that a Company undertakes to fulfill its CSR obligation within three years, excluding the financial year it was commenced, and shall include projects that were initially not approved as multi-year projects but whose duration is extended beyond one year by the Board based on reasonable justification.
- k) “Rules”** shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re-enactment, modifications or amendments thereof.

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

III. Scope of CSR Activities:

The CSR initiatives of the Company are identified in consultation with the management, social experts, community and other stakeholders. The identified focus areas for the Company’s CSR initiatives are:

1. eradicating hunger, poverty and malnutrition, promoting health care including preventive health and sanitation including contribution to the Swatch Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
2. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
3. 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;
4. 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;
5. 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;
6. measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPE) and Central Para Military Forces (CPMF) veterans, and their dependents including windows;

7. training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
8. 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;
9. (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by 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);
10. rural development projects
11. 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.
12. disaster management, including relief, rehabilitation and reconstruction activities.

In addition to above, the Company may take up any other CSR activities as notified in Schedule VII of the Companies Act, 2013 (as amended from time to time).

IV. Powers of the Board:

The Board of the Company will be responsible for:

- a) The Board shall ensure that the CSR activities are undertaken by the Company itself or through –
 - i. a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
 - ii. a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
 - iii. any entity established under an Act of Parliament or a State legislature; or

- iv. 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.
- b) Forming a CSR Committee with such Directors as its members as it may deem fit and in accordance with the section 135 of the Act read with CSR Rules.
- c) Reviewing and approving the CSR policy as recommended by the CSR Committee.
- d) Monitoring the implementation of the CSR policy through the CSR Committee in accordance with this Policy.
- e) Ensuring that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- f) In case of ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- g) Disclosing in Board's report, the annual report on CSR as per the format as prescribed under the Act read with CSR Rules.
- h) Ensuring the placing of CSR Policy, composition of CSR Committee, projects approved by the Board and other matters as may be prescribed by authorities from time to time, on the Company's website.

The Board may also decide to collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with CSR rules and this Policy.

The number of members of CSR Committee and their powers and functions can be specified, varied, altered or modified from time to time by the Board, subject to Act and such rules and regulations as may be in force. The Board may also provide that the CSR Committee shall exercise certain powers only after consultation with the Board and in such case the said powers shall be exercised accordingly.

The Board in its absolute discretion may from time to time modify, change, vary or the CSR Policy, provided that such amendment or alteration shall be in compliance with the applicable clauses of Act and CSR Rules.

V. CSR Expenditure

For every financial year, minimum CSR spending of the Company shall be as per the provisions of section 135 of the Act read with CSR Rules including all modifications and amendment thereof.

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

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 of the Act, within a period of six months of the expiry of the financial year.

Where a Company spends an amount in excess of requirement, 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 –

- a) the excess amount available for set off shall not include the surplus arising out of the CSR activities.
- b) the Board of the company shall pass a resolution to that effect.

The CSR amount may be spent by a Company for creation or acquisition of a capital asset, which shall be held by –

- a) a Company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number; or
- b) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
- c) a public authority.

VI. Monitoring and Implementation

To ensure effective implementation of the CSR activities / programs / projects undertaken, a monitoring mechanism will be put in place. If, pursuant to Section 135 of the Companies Act, 2013, the average CSR obligation is ten crore or more in the three immediate preceding financial years, then the Company shall undertake impact assessment, through an independent agency, for their CSR projects having outlays of one crore rupees or more and which have been completed not less than one year before undertaking the impact study.

Collaborative partnership may be formed with the Government, the district authorities, the Village Panchayats, NGOs, other Companies and other likeminded stakeholders with the intent to widen the Company's reach and leverage upon the collective expertise, wisdom and experience that these partnerships bring on the table.

VII. General

Words and expressions used but not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, the CSR Rules made thereunder or in any amendment thereto. This CSR Policy shall also be subject to such clarifications and FAQs as may be issued by Ministry of Corporate Affairs from time to time. Notwithstanding anything contained in this Policy, no action pertaining to CSR activities shall be taken in contravention / deviation to the provisions of Section 135 of the Companies Act, 2013 and of the Companies (Corporate Social Responsibility Policy) Rules, 2014 and applicable Government Guidelines, as amended from time to time.



The Board of Directors, on its own and/or on the recommendation of CSR committee, can amend any of the provisions of this policy and as and when required deemed fit. Any or all provisions of CSR Policy would be subjected to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.

In case of any subsequent changes in the provisions of the Act which makes any of the provisions in this Policy inconsistent with the Act, then the provisions of the Act would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with the Act.

Date of Original adoption	Effective date of the Policy
6 th November, 2023	6 th November, 2023
