

CORPORATE SOCIAL RESPONSIBILITY POLICY

HIGHLEVEL INDIA PRIVATE LIMITED

Approved by	Board of Directors
Document Owner	Highlevel India Private Limited
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Corporate Social Responsibility (CSR) Policy

(Pursuant to section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014)

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1. Purpose

The Corporate Social Responsibility Policy ("CSR Policy") of Highlevel India Private Limited has been approved and adopted by the Board of Directors at its meeting held on 22nd June 2024.

This policy aims to contribute to sustainable development of the society and environment in India to make the planet a better place for future generations.

The activities enlisted in this CSR Policy should be carried out by the Company either individually or in association with eligible Implementing Agencies registered with the Ministry of Corporate Affairs.

The CSR Policy is formulated in accordance with the provisions of section 135 of the Companies Act, 2013 and rules made thereunder and other applicable laws to the Company.

2. Effective Date

This policy shall be effective from the beginning of the fiscal year, which begins on 1st April 2024.

3. Definitions

- (i) "Act" means the Companies Act, 2013.
- (ii) "Board of Directors" or "Board" means the collective body of the directors of the company.
- (iii) "Company" means "Highlevel India Private Limited".
- (iv) "CSR Committee" means Corporate Social Responsibility Committee constituted by the Board of Directors of the company.
- (v) "CSR Policy" means CSR Policy of Highlevel India Private Limited.
- (vi) "CSR Rules" means the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.
- (vii) "Implementing Agency" means any entity registered with Ministry of Corporate Affairs for undertaking CSR projects, which is engaged by the company to implement various projects in pursuance of CSR Policy.

Any term used in this CSR Policy but not defined herein shall have the same meaning assigned to them under the Act and CSR Rules as applicable to the Company.

4. CSR Committee

In case the amount to be spent by Company under sub-section (5) of section 135 of Companies Act 2013 does not exceed fifty lakh rupees, the requirement under sub-section (1) for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee provided under this section and as listed below shall, in such cases, be discharged by the Board of Directors of the Company.

The duties of the CSR Committee are as follows:

- a) To formulate and recommend a CSR Policy indicating the activities to be undertaken by the Company in areas or subjects specified in Schedule VII to the Act;
- b) To recommend the amount of expenditure to be incurred on the activities referred to in clause (a);
- c) To formulate and recommend an annual action plan in pursuance of CSR Policy covering the following aspects:
 - i) the list of approved CSR projects or programs to be undertaken in areas or subjects specified in Schedule VII to the Act;
 - ii) the manner of execution of such projects or programs as specified in rule 4(1) of CSR Rules;
 - iii) the modalities of utilisation of funds and implementation schedules for the projects or programs;
 - iv) monitoring and reporting mechanism for the projects or programs; and
 - v) details of need and impact assessment, if any, for the projects undertaken by the Company;
- d) Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect.
- e) To monitor the CSR Policy as approved by the Board from time to time.

The CSR Committee (in its absence, the Board of Directors) should recommend the approach and direction of CSR activities to be undertaken by the Company and also provide guiding principles for

- i) Selection of CSR projects / programmes / activities.
- ii) Implementation of CSR projects / programmes / activities.
- iii) Monitoring of CSR projects / programmes / activities.
- iv) Formulation of the annual action plan.

5. CSR Activities

Company shall undertake CSR activities for development of the society and the environment in India, particularly in the vicinity of the areas where the facilities of the Company are located.

A. The company shall undertake such activities which are broadly related to any of the following:

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including 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.
- (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, 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 Paramilitary Forces (CPMF) veterans, and their dependents including widows.
- (vii) training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports.
- (viii) Rural development projects.
- (ix) 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.

- (x) Disaster management, including relief, rehabilitation and reconstruction activities.

B. The company may also contribute to the following funds as part of CSR activities:

- (i) Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- (ii) Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- (iii) 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 caste, tribes, other backward classes, minorities and women;
- (iv) 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;
- (v) 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 Defence 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).

The above areas as enshrined in Schedule VII to the Act and included in this policy aim to provide macro areas in which CSR projects should be undertaken by the Company. The CSR Committee should consider details of CSR projects as elaborated in the annual action plan for each fiscal year.

Any CSR activity proposed to be undertaken as a CSR initiative, but not specifically covered in the aforesaid list in this Section B), may be undertaken only with the prior approval of the Board and CSR Committee, as may be applicable.

6. Focus Areas

While the Company may undertake CSR activities in any areas listed above, the focus areas of CSR activities should be on the following aspects:

- (i) Health Camps
- (ii) Environment protection
- (iii) Rainwater Harvesting
- (iv) Rural Transformation
- (v) Safe Drinking Water
- (vi) Education to underprivileged

7. Annual Action Plan

The Board of Directors / CSR Committee shall formulate and recommend to the Board, an annual action plan which shall include the following:

- (i) the list of CSR projects or programmes that are approved and to be undertaken by the company
- (ii) the manner of execution of such projects or programmes
- (iii) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- (iv) monitoring and reporting mechanism for the projects or programmes; and
- (v) details of need and impact assessment, if any, for the projects undertaken by the company.

The Board of Directors is empowered to alter the annual action plan during the fiscal year, if so recommended by the CSR Committee, based on the reasonable justification for such change.

8. CSR Spending

The Company shall endeavour to achieve the objectives of CSR Policy and allocate every year:

- a. Minimum 2% of its average net profits made during the three immediately preceding fiscal years
- b. Any income or surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the company and the same shall be ploughed back for use in CSR activities All the expenditure relating to CSR shall be pre-approved by the CSR Committee. The CFO, if any, shall monitor the utilization of funds for the purposes set forth and certify to this effect. Unspent CSR amount, if any, shall be transferred to a separate account in accordance with the applicable CSR Rules..

9. Mode of implementation

CSR programs, projects or activities of the Company should be implemented through the following methods:

- i. Directly by the Company;
- ii. Implementing Agencies;
- iii. Any foundation or body incorporated by the Company and eligible to undertake such CSR projects.
- iv. in collaboration with other organizations/group companies

The Company may engage suitable Implementing Agencies to undertake approved CSR projects. The Company may also partner with local governance bodies, such as Gram Panchayats, Civic Bodies, Municipality to directly undertake approved CSR projects with the help and support of these bodies.

10. Capital Assets

Capital asset acquired or created by CSR projects should be held by the beneficiaries of the said CSR project or a trust or a public authority for the benefits of all. The Company should take appropriate measures to ensure that such assets are utilized for their intended purpose and should not be transferred or disposed of without prior permission of the Company.

11. Information dissemination

CSR Policy and activities undertaken shall be disseminated on a website for public access and shall be published in the Annual Report of the Company in the format prescribed under the Act and CSR Rules.


12. Review

The Board of Director shall be fully responsible for the monitoring and review of the implementation of this policy in accordance with applicable laws from time to time. The CSR Committee shall provide recommendations as and when it deems necessary to the Board so as to amend/ modify/ revise the CSR Policy.

Note: In addition, the CSR Policy of the Company may give guidance on Voluntary CSR Initiatives, Voluntary CSR Audit, CSR Governance Principles and reporting about deviations, if any. Further, CSR Policy may also provide for guidance on disclosure of awards and recognitions received.

For and on behalf of Board of directors of

Highlevel India Private Limited

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