



JMC Projects (India) Limited

CORPORATE SOCIAL RESPONSIBILITY POLICY

(Amended w.e.f. May 10, 2021)

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Original Policy adopted	Effective from November 06, 2014
First amendment	Effective from May 10, 2021

The Policy is authenticated by the following persons.

Name	Signature
Mr. Shailendra Kumar Tripathi CEO & Managing Director	Sd/-
Mr. Samir Raval Company Secretary	Sd/-

JMC PROJECTS (INDIA) LIMITED

Corporate Social Responsibility Policy

1. CSR PHILOSOPHY AND BACKGROUND

The world is facing numerous challenges ranging from poverty, malnutrition, environmental degradation, poor healthcare and global warming. The Corporate Social Responsibility Policy focuses on using the capabilities of businesses to improve lives and contribute to sustainable living, through contribution to communities and society at large. Corporate Social Responsibility in the form of statue is a reflection of ancient Indian virtue “Law of giving.” CSR initiative is a step towards giving back to the society for sustainable economic growth and nation building.

This Corporate Social Responsibility Policy is as per the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

2. OBJECTIVES

JMC Projects (India) Limited (hereinafter “the Company” or “JMC”) being a dominant player in the construction sector believes in giving back to the society and to honor its social responsibility. The objective of this CSR Policy is to lay down guiding principles for proper functioning of CSR activities towards steps for sustainable development of the society.

Objectives of this CSR Policy would include the following.

- Directly or join hands to take up programmes that benefit the communities and results, over a period of time, in enhancing the quality of life and economic well-being of the needy populace.
- To generate, through its CSR initiatives, a community goodwill for the Company and help reinforce a positive and socially responsible image of JMC as a corporate citizen.
- To contribute towards human welfare, social upliftment and economic growth with Indian philosophy of “*Vasudhiva Kutumbakam*” i.e. Entire world is one family.

3. DEFINITIONS

(a) “**Act**” means the Companies Act, 2013 read with Rules including the Companies (Corporate Social Responsibility Policy) Rules, 2014 as may be amended from time to time.

(b) “**Administrative Overheads**” means the expenses incurred by the Company for ‘general management and administration’ of Corporate Social Responsibility

functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.

- (c) **“Agency”** means group of volunteers, citizen forums, elected local body, panchayats, institute, schools, hospitals, help centers, governments, government organizations, authorities, welfare board, labour union, care centers, medical aid centers, orphan houses, social activist, mahila mandals, society, individual and companies; who are involved in activities of benevolent, generous, social upliftment, wellbeing and development of deprived class of people or activities similar to CSR Activities, Non-Government Organization, Charitable Trust, Foundation, forum and/or other organization or persons of repute, which are doing activities of; philanthropic, benevolent, charitable and for well-being of society at large and needy class of people; without motive of profit and having good track record of atleast three years and approved by the CSR Council / Committee.
- (d) **“Board”** means Board of Directors of the Company for the time in force.
- (e) **“Company”** or **“JMC”** means JMC Projects (India) Limited.
- (f) **“Corporate Social Responsibility” (CSR)** means the activities undertaken by a Company in pursuance of its statutory obligation laid down in Section 135 of the Act in accordance with the provisions contained in these rules, but shall not include (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 by the companies on sponsorship basis for deriving marketing benefits for its products or services (vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India.
- (g) **“CSR Committee”** or **“Committee”** means “Corporate Social Responsibility Committee” of the Directors of the Company, as may be constituted by the Board and as may subsist from time to time.
- (h) **“CSR Council”** means committee comprising of CEO & Managing Director, Chief Financial Officer, Heads of all Business Units / Divisions, Head (Project Controls), Head (Commercial), HR Head, Administration Head, EHS Head, Company Secretary and any other persons as appointed by the CSR Committee from time to time.
- (i) **“CSR Policy”** or **“this Policy”** means a statement containing the approach and direction given by the board of a Company, taking into account the

recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

- (j) **“CSR Activities & Programmes”** includes activities as described in this Policy, activities prescribed under the Schedule VII of the Act and/or any other permitted activities as may be prescribed under the Act.
- (k) **“Division”** or **“Work Center”** means every division, department and business unit of the Company viz. Infra, Industrial & Power (I & P), North India Operation (NIO), West India Operation (WIO), South India Operation (SIO), Environment, Health and Safety (EHS), Corporate Office and Registered Office and any other department or division or project or site as may be identified as work center for the purpose of this Policy.
- (l) **“International Organisation”** means an organisation notified by the Central Government as an international organisation under Section 3 of the United Nations (Privileges and Immunities) Act, 1947 (46 of 1947), to which the provisions of the Schedule to the said Act apply.
- (m) **“Ongoing Project”** means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.
- (n) **“Public Authority”** means ‘Public Authority’ as defined in clause (h) of Section 2 of the Right to Information Act, 2005 (22 of 2005).
- (o) **“Section”** means a Section of the Act.

4. APPLICABILITY AND EFFECTIVE DATE OF THE POLICY

This CSR Policy has been developed in consonance to Section 135 of the Companies Act, 2013 and Rules notified thereunder. This Policy shall apply to all CSR Programmes undertaken by the Company in India.

This CSR Policy shall apply to the Company. The Policy will be applicable to its Subsidiary / Associate Company, if so decided by the Board of respective Subsidiary / Associate Company.

The CSR Committee has approved the Original Policy in its meeting held on November 06, 2014 and the Board has approved it in its meeting held on the same day.

The CSR Committee of the Company had recommended and the Board has approved this revised Policy at their respective Meeting held on May 10, 2021 to incorporate the requirements of the applicable laws. This revised Policy shall come into effect from May 10, 2021. This Policy will supersede the provisions of the earlier Policy adopted by the Company on November 06, 2014.

5. EXTENT OF CSR ACTIVITIES AND CSR PROGRAMMES

5.1 Area of CSR Activities

JMC's Initiatives towards CSR and CSR Programmes would be relating to the activities as prescribed in the Annexure in pursuance of the Schedule VII to the Companies Act, 2013. While the Company's focus on CSR efforts will be in the local areas and areas around where it operates, the Company may also undertake projects where societal needs are high or in special situations such as in the case of natural disaster etc.

5.2 Our approach to CSR Programmes and Thrust area

While focusing on CSR Activities as per the Annexure, JMC intends to prefer to undertake CSR activities in the areas of education, healthcare, medical welfare, sanitation, rural development, child welfare, women empowerment, animal welfare, social welfare, environment protection, protection of national heritage, art and culture, promotion of sports, slum area development, disaster management etc.

6. CSR FUNCTIONARIES

6.1 CSR Council

CSR Council shall comprise of CEO & Managing Director, Chief Financial Officer, Heads of all Business Units / Divisions, Head (Project Controls), Head (Commercial), HR Head, Administration Head, EHS Head, Company Secretary and any other persons as may be appointed by the CSR Committee from time to time. CSR Council shall perform the following functions.

- a) Identification of CSR Programmes around the project sites and / or as per societal needs.
- b) Review and recommend CSR Programmes to the CSR Committee.
- c) Monitoring, appraising and reporting to the CSR Committee.
- d) Any other tasks and functions as may be assigned by the CSR Committee.

6.2 CSR Committee

The CSR Committee shall comprise of Directors including Independent Director of the Company as may be constituted and / or reconstituted by the Board of the Company from time to time as per the applicable law. The CSR Committee shall play important

and guiding role in the CSR Activities. Role and terms of reference of the CSR Committee includes the following.

- a) To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company in the areas or subject, specified in Schedule VII of the Act.
- b) To recommend the CSR projects or programmes or activities and amount of expenditure to be incurred thereon for the approval of the Board.
- c) To provide oversight and guidance on CSR performance and monitor compliance with the CSR policy, commitments and the applicable CSR provisions.
- d) To formulate and recommend to the Board, an annual action plan including the modalities of utilisation of CSR funds and implantation schedules for the projects or programmes, monitoring and reporting mechanism for the projects or programmes and details of need and impact assessment for the projects undertaken by the Company.
- e) To monitor the Corporate Social Responsibility Policy of the Company from time to time.
- f) To implement CSR projects or programmes or activities as approved by the Board in a timely and efficiently manner.
- g) To institute a transparent monitoring mechanism for effective implementation of the CSR projects or programs or activities of the Company.
- h) To perform functions as may be necessary from time to time under the Act or as may be assigned to it by the Board from time to time in relation to the CSR activities.

The CSR Committee may regulate its own procedures and shall meet as and when required and also when the Board requests for the same.

The Committee may seek attendance of Department Heads and obtain relevant data, details and analysis as it may deem necessary. The Committee may also take the experts' advice wherever they deem necessary in discharge of their duty.

6.3 Board of Directors

The functions of the Board relating to CSR of the Company includes approving of CSR Policy, constitution of CSR Committee, approve resources for CSR Programmes and annual action plan, review the performance and impact of CSR programmes, overall monitoring of CSR Activities including ongoing project(s) so as to satisfy itself that the CSR funds have been utilized for the purposes and in the manner as approved by it, compliance with statutory disclosures & reporting and other matters as mentioned in this Policy and as per applicable provisions of the law.

In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and can make modifications, if any, for smooth implementation of the project within the overall permissible timeline.

The Board shall ensure that the CSR activities are undertaken by the Company itself or through 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** 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** any entity established under an Act of Parliament or a State legislature **OR** 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.

7. IMPLEMENTATION OF CSR PROGRAMMES

7.1 Identification of CSR Programmes

The CSR Activities of the Company shall be carried out as per this Policy. The Company will undertake the CSR Activities through one or more methods as may be suitable from time to time out of following.

- a) Recommendations from the members of CSR Council, CSR Committee and Board of Directors.
- b) Internal assessment and discussion with CSR Council.
- c) Receipt of proposals or requests from NGOs, social activists, schools, hospitals, care centers, organizations, unions, organization, registered trust, registered society, Section 8 Company and persons involved in philanthropic and generous tasks.

7.2 CSR Programmes directly by the Company

- (a) CSR Council will identify, review and finalize the CSR Programme keeping in view the location, present circumstances and needs of class of population, prospective beneficiaries, resource requirement, programme duration, coverage and fund requirement. CSR Council will prepare a proposal for CSR Programme and make its recommendation to the CSR Committee.
- (b) CSR Council will identify CSR Programme as may be suitable in the vicinity or surrounding area or region of respective project site of the Company.
- (c) CSR Committee may consider, discuss and recommend to the Board for approval of the CSR Programme with suggestion and modification, if it thinks appropriate.
- (d) CSR Programme shall be carried out as per the recommendation / approval of the Board of the Company.
- (e) A Company may engage international organization(s) for designing, monitoring and evaluation of the CSR projects or programs as per this CSR policy as well as for capacity building of its own personnel for CSR.

7.3 CSR Programme through External Agencies

- (a) The CSR Programme which needs considerable financial commitments, sizable coverage and medium to long term time frame, may be considered for implementation through competent NGO / Agencies, including innovative partnership. CSR Council shall make detailed proposal, review the competence, legal status and background of the NGO / Agencies and recommend the same to CSR Committee with all relevant details including beneficiaries, fund requirement, resources and responsibilities of NGO / Agency, time frame, milestone, implementation schedule, results expected, monitoring and reporting mechanism and measurable outcome.
- (b) The Company may donate appropriate amount to an external NGO(s), Government, Local Administration, registered trust, registered society and / or Section 8 Company which is well established, having valid applicable registration or certificates governed under applicable laws and having good track record of doing CSR Activities.
- (c) The Company may undertake CSR activities through Kalpataru Foundation which is Section 8 Company established in a group with the object of undertaking various CSR activities.
- (d) In the aforesaid case, the CSR Committee shall specify the CSR Activities, CSR Programmes to be undertaken through above mentioned organization, modalities of utilization of funds, monitoring and reporting mechanism.

7.4 Joint efforts for CSR Programme

The Company may join hands with companies including Holding Company, Subsidiary Companies and Associate Companies to carry out CSR Programmes jointly.

A Company may also collaborate with other companies for undertaking projects or programs 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 programs in accordance with the applicable Rules.

8. RESOURCES

The Company shall spend 2% of the average net profits of the Company during the immediately preceding three financial years or such amount as may be required by the statutory provisions towards the CSR Activities as may be recommended by the CSR Committee and approved by the Board.

CSR expenditure will include all expenditure incurred by the Company on CSR Programmes undertaken in accordance with the approved Annual Action Plan. The surplus, if any arising out of the CSR Projects or Programs shall not form part of the business profit of the Company and shall be dealt with in accordance with the applicable CSR Provisions. Likewise, any excess amount spent on CSR activities may be set off against the requirement to spend in the succeeding financial years in accordance with the applicable CSR Provisions. In the event the Company creates or

acquires capital asset out of the CSR spend, such capital asset will be dealt with in terms of the applicable CSR Provisions.

If the Board determines, CSR Corpus may be created by allocating appropriate amount every year as may be suggested by the CSR Committee and approved by the Board. Such CSR Corpus will be used to meet the fund requirements of CSR Programme. The CSR Committee may allocate fund in such proportion as it thinks fit for long term and short term CSR Programmes.

9. MONITORING, REPORTING AND DISCLOSURE

CSR Programmes, activities and other aspects of this Policy shall be reviewed and monitored periodically by the CSR Committee as it thinks fit. The CSR Committee and CSR Council shall act in close co-ordination. The CSR Committee may discuss and review about the CSR activities with CSR Council and may obtain suggestions for effective and smooth implementation.

Monitoring also includes field visit, comprehensive documentation and interaction with beneficiary community. CSR Council may assign accountabilities for implementation / monitoring of CSR Programme to a member of Council or Division Head.

In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation. The Board may make modifications, if any, for smooth implementation of the project within the overall permissible timeline.

The Annual Report on CSR activities undertaken by the Company shall be prepared for the approval of the Board as per the statutory requirement. Necessary details about CSR Activities of the Company shall be disclosed in the Annual Report of the Company.

As and when the Company reaches an average CSR obligation of ten crore rupees or more in pursuance of sub-section (5) of Section 135 of the Act, in the three immediately preceding financial years, it shall undertake an impact assessment, through an independent agency, of its 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.

Accordingly, the impact assessment reports, if applicable shall be placed before the Board and shall be annexed to the Annual Report on CSR.

The Board of a Company 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 or the person responsible for financial management shall certify to the effect.

Unspent CSR amount, if any, shall be dealt with by the Company as per the applicable CSR Provisions.

10. REVIEW AND AMENDMENT(S) IN THE POLICY

Amendments from time to time to the CSR Policy, if any, shall be considered by the Board of Directors based on the recommendations of the CSR Committee.

The CSR Committee may issue the guidelines, procedures, formats, reporting mechanism and manual in supplement for effective implementation of this Policy.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant government authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Annexure

Guiding Principles for the Annual Action Plan

Projects/Programmes/Activities/ Initiatives	Manner of Execution	Modalities of utilisation of funds and Implementation Schedule	Monitoring, Reporting Mechanism, Evaluation and Impact
<p>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.</p> <p>ii. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.</p> <p>iii. promoting gender equality, empowering women, setting up homes and hostels for</p>	<p>Directly/ Kalpataru Foundation/ Government / through 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 a Company established under Section 8 of the Act or a registered trust</p>	<p>As and when required</p>	<ul style="list-style-type: none">• Pre and Post Evaluation;• Annual Report;• Number of beneficiaries / units covered;• Change in knowledge, attitude and practices of beneficiaries;• Project Progress Report / Periodical Report / Impact Report;

<p>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.</p> <p>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.</p> <p>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;</p> <p>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;</p> <p>vii. training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports</p> <p>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 govt. for socio</p>	<p>or a registered society, established by the Central Government or State Government OR any entity established under an Act of Parliament or a State legislature OR 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.</p>		<ul style="list-style-type: none"> • Contribution in cash or kind.
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<p>economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;</p> <p>ix. (a) 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 (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).</p> <p>x. rural development projects xi. slum area development.</p>			
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xii. disaster management, including relief, rehabilitation and reconstruction activities.			
xiii. Other programmes / projects relating to the above mentioned activities and/or activities permitted as a part of CSR under the Act, Schedule VII and Rules made thereunder.			

The CSR initiatives are to be undertaken based on need/consultation with the communities and/or various external agencies. The Company need to undertake impact assessment, if required as per CSR Provisions through an independent agency, of its 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.