

**CORPORATE SOCIAL RESPONSIBILITY POLICY**  
**BHARATHI CEMENT CORPORATION PRIVATE LIMITED**  
**& ITS SUBSIDIARIES**

**Context**

The Companies Act' 2013 (Act) has introduced several provisions which would change the way Indian corporates do business and one such provision is spending on Corporate Social Responsibility (CSR) activities. CSR, which has largely been voluntary contribution by corporates, has now been included in law.

Further pursuant to Section 135 of the Companies Act, 2013, and Companies (Corporate Social Responsibility Policy) Rules, 2014 every Company having either a) net worth of INR 500 crore or more; or b) turnover of INR 1,000 crore or more; or c) net profit of INR 5 crore or more, shall constitute Corporate Social Responsibility Committee ('CSR Committee') and the CSR Committee shall formulate and recommend Policy.

**Objectives**

This Policy shall be read in line with Section 135 of the Companies Act 2013, Companies (Corporate Social Responsibility Policy) Rules, 2014 and such other rules, regulations, circulars, and notifications (collectively referred hereinafter as 'Regulations') as may be applicable and as amended from time to time and will, inter-alia, provide for the following:

- Establishing a guideline for compliance with the provisions of Regulations to dedicate a percentage of Company's profits for social projects.
- Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting

**CSR Policy:**

The Policy recognises that CSR is not merely compliance and it is a commitment to support initiatives that measurably improve the lives of underprivileged by one or more of the following focus areas as notified under Section 135 of the Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014.

➤ **CSR activities to include:**

1. Objective to efface the daily life segments including poverty, malnutrition and hunger while enhancing the standard of living and promoting the facets of better health care and sanitation.
2. Initiative to promote the different segments of education including special education and programs to enhance the vocation skills for all ages like children, women, elderly and conducting other livelihood enhancement projects.
3. Aim to bring the uniformity in respect of different sections of the society to promote gender equality and other facilities for senior citizens and developing hostels for women and orphans and taking initiative for empowering women and lowering inequalities faced by socially and economically backward groups.

4. Elevate the segment of flora and fauna to bring the ecological balance and environmental sustainability in respect of animal welfare, conservation of natural resources and agro forestry while maintaining the quality of air, water and soil.
5. Enhancement of Craftsmanship while protecting art and culture and measures to restore sites of historical importance and national heritage and promoting the works of art and setting up of public libraries.
6. Steps to bring worthy to the part of war windows, armed force veterans and their departments.
7. Sports programs and training sessions to enhance the level of rural sports, nationally recognized sports, Paralympic sports and Olympics sports.
8. Favoring to Prime Minister's National Relief Fund and contribution to other fund set up by the central government to promote socio-economic development and welfare of the schedule castes and Schedule Tribes and for supporting backward classes, minorities and women.
9. To uplift the technology of incubator that's comes under academic institutions and which are approved by the Central Government.
10. Introducing varied projects for Rural Development.
11. Any other measures with the approval of Board of Directors on the recommendation of CSR Committee subject to the provisions of Section 135 of Companies Act, 2013 and rules made there-under.

The below activities doesn't include under the CSR activities of the Company.

- Business run in the normal course.
- Outside the territory of the India or abroad.

### **1.1 Scope:**

The Company is eligible to undertake any suitable/rightful activity as specified in Schedule VII of the Act.

### **1.2 CSR Annual Action Plan and Location of CSR Efforts**

The CSR Committee shall decide on the locations for CSR activities and formulate and recommend to the Board for approval a CSR annual action plan, which shall contain all matters which are required under Applicable Law and any other matters as the CSR Committee may deem fit from time to time. The Board may modify the annual action plan as per the recommendations of the CSR Committee at any time during the financial year, based on reasonable justification.

### **1.3 CSR Expenditure**

CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR activities undertaken in accordance with the approved CSR Plan. Moreover, any surplus arising from any CSR activities shall be used for CSR. Accordingly, any income arising from CSR activities will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.

Tax treatment of CSR spent will be in accordance with the Income Tax Act as may be notified by CBDT.

## **2. CSR Committee**

### **2.1 Guiding Principles for Constitution of CSR Committee**

The CSR Committee will consist of three Directors. The Committee will meet as and when required to discuss and review CSR activities and Policy. The quorum for the Corporate Social Responsibility (CSR) Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher is required to be present for the proceedings to take place. The Committee members may attend the meeting physically or via such audio-visual means as permitted under the Act. The Committee shall have the authority to call such employee(s), senior official(s) and/or externals as it deem fit. The Company Secretary shall act as Secretary to the Committee.

## **2.2 Committee Members\***

The current Chairperson and Members of the Committee are as follows:

- Mr. Anoop Kumar Saxena- Chairperson
- Mr. G. Balaji- Member
- Mr. Gianfranco Tantardini- Member
- Mr. J J Reddy-Member

*\*the composition of CSR Committee may be changed by the Board as and when required.*

## **2.3 Extended Members**

- Extended Members include employees in the Company and/or associated registered Trusts, Societies or Section 8 Companies operating in India, for supporting causes identified by the CSR Committee.
- The Extended Members should also be provided with adequate facilities as required.
- All Extended Members and volunteers must follow norms of confidentiality, if and as applicable.

## **The responsibilities of the CSR Committee include:**

- Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken,
- Recommending the amount of expenditure for the CSR activities, and Monitoring CSR activities from time to time.
- The persons/bodies to which the implementation is assigned will carry out such CSR activities as determined by the CSR Committee within the specified budgets and timeframes and report back to the CSR Committee on the progress thereon at such frequency as the CSR Committee may direct.
- At the end of every financial year, the CSR Committee will submit its report to the Board.
- The Company will report the details of the CSR activities of the Company in the Director's Report and on the website of the Company at [www.bharathcement.com](http://www.bharathcement.com), as required under the Regulations.

## **3. Information dissemination**

The Company's engagement in this domain is disseminated on its website, Annual Reports, in house journals and through the media.

## **4. Amendments to the Policy**

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this Policy, 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 Rules/Regulations as may be issued from relevant statutory authorities from time to time.

#### **5. Effective Date**

This policy is effective from 17<sup>th</sup> March, 2025.

#### **6. Contact**

For queries related to the CSR Policy, please write to us at: [india.compliance@vicat.com](mailto:india.compliance@vicat.com)

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