



M.I.T.R.A. AGRO EQUIPMENTS PRIVATE LIMITED

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CORPORATE SOCIAL RESPONSIBILITY POLICY

Document Name	Corporate Social Responsibility Policy (“ CSR Policy/Policy ”)
Approved by	Board of Directors (“ Board ”)
Original document Date	April 28, 2022
Review Version & Date	-
Initial of the Chairperson of the Governing Body	

A. Objective & Philosophy.

M.I.T.R.A. Agro Equipments Private Limited (“**M.I.T.R.A.**” or “**Company**” or “**We**” or “**Our**”) has articulated this CSR Policy in alignment with its objective, principles and values, delineating its responsibility as a socially and environmentally responsible corporate citizen and to define the governance and monitoring framework for ensuring effectiveness of the CSR Policy.

This Policy is in conformity with the provisions of Companies Act, 2013 and rules made thereunder (“**Act**”). Any new provision arising out of amendments to Act, shall be construed to be a part of this Policy and shall be specifically incorporated. Words and expressions used in this Policy and not defined herein but defined under the Act shall have the meanings respectively assigned to them therein.

We believe that an enterprise possesses capability to transform by unleashing its power of entrepreneurial vitality, innovation and creativity. It is with this belief that M.I.T.R.A. continues to craft unique and sustainable models to generate livelihoods and environmental capital. Programmes, projects and activities carried out in this regard are the subject matter of this Policy.

B. The Regulatory Framework of CSR Policy.

Section 135 of the Act and Schedule VII of the Act provides framework for the companies to define the key thrust areas in CSR domain. The Company’s CSR Policy would pertain to all CSR activities undertaken by the Company within the contours of the Act. The CSR activities of the Company shall not include any benefits which are exclusively for the employees of the Company or their family members.

C. The Key CSR Activities.

The Company’s primary focus areas for CSR activities within the ambit of the Act includes the following (“**CSR Activities**”):

1. Hunger, poverty, malnutrition and healthcare.

Work towards eradicating hunger, poverty and malnutrition and sanitation, thereby promoting health care and preventive health care. The Company may also choose to work with various non-profit organizations that run mid-day meal programs in schools across India and may establish kitchens that provide meals to school children.

The Company hopes to innovately create impact in the healthcare sector. It aims towards making available safe drinking water to India’s populace.

2. Education.

Support the transformation of the education system in India to achieve its goals of increasing equity and employability among children and support teachers and schools to develop high quality learning spaces.

3. Rural development.

The Company believe that the well-being of people living in rural areas ensures sustainable development. The Company may work with local administrations to achieve community development goals. The Company may partner with governments and NGOs and support

them in improving infrastructure such as constructing roads, providing drainage systems, electricity, rehabilitating natural-disaster affected victims, etc. in rural areas.

4. Gender equality, environmental sustainability, sports, art and culture.

The Company shall, among other things focus on empowering women by supporting them to develop a gender equitable society, where women have equal opportunities and rights to engage, participate and contribute to national development.

Engage with communities to build an awareness for biodiversity, undertake activities and projects to protect our environment and may also work towards protection of national heritage, art and culture including restoration of buildings and sites of historical importance.

We also propose to engage in training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports

5. National Emergency & Disaster Relief.

Provide support to specific needs such as natural disasters, through financial as well as logistical support.

Apart from the CSR Activities undertaken in the above focus areas, the Governing Body may choose to select activities in areas or subjects, as prescribed in Schedule VII of the Act.

D. Governance Structure.

1. The Board of Directors of the Company (“**Governing Body**”) is the governing body that will articulate the scope of CSR Activities for the Company and ensure compliance with the CSR Policy. The Governing Body would comprise of such minimum number of directors as may be prescribed under the Act but at any time the number of directors shall not be below 2 (two) directors.
2. The Governing Body shall:
 - (a) formulate the CSR Policy and make any amendments thereto;
 - (b) recommend/prescribe and set aside the amount of expenditure to be incurred on the activities referred to in the CSR Policy.
 - (c) indicate the CSR Activities to be undertaken by the Company as specified in the Act;
 - (d) review the annual CSR plan;
 - (e) monitor the CSR Activities and compliance with the CSR Policy from time to time; and
 - (f) review and implement, if required, any other matter related to CSR initiatives.
3. The Governing Body may meet at least once in every financial year.

E. Operating Framework.

1. CSR Activities will be undertaken in areas identified by the Governing Body. An annual CSR plan shall be presented by the Governing Body.
2. CSR activities shall be undertaken by the Company directly or through non-government organisations (“NGOs”) / voluntary organizations/trusts/section 8 company as defined under the Act (non-profitable) established by the Company or by Central or State Government or any entity established under an Act of Parliament or a State legislature,

concerned State/District authorities/Panchayat Raj Institutions at district / block / village level/ self-help groups.

3. The responsibility for implementation of identified CSR Activities/ projects shall be as per the organizational structure approved by the Governing Body.
4. The annual plan shall incorporate the following:
 - (a) The prescribed outlay on CSR as per the Act and related rules as amended from time to time;
 - (b) Key CSR Activity/(ies) proposed to be undertaken during the year, including analysis of their eligibility for classification as CSR under the Act, their conformity with the CSR Policy and their implementation schedules;
 - (c) Proposed outlay on each CSR Activity;
 - (d) CSR Activity/(ies) to be undertaken by the Company directly.
 - (e) Aggregate proposed outlay and reasons for shortfall, if any, compared to the prescribed outlay.
 - (f) Funds would be disbursed either in tranches or as one-time payment. The terms, conditions and timing of disbursement would be conditional upon the nature and requirement of the CSR project or programme.
 - (g) Surplus arising out of CSR projects shall not form part of the business profit of the Company.

F. Monitoring.

The Governing Body shall ensure a transparent monitoring mechanism for CSR Activities.

- (a) The Governing Body shall review the progress of CSR Activities periodically, including the annual review.
- (b) The CSR Activity/(ies) along with requisite information on the expenditure, etc. shall be reported every year in the annual report of the Company.

G. CSR Expenditure.

The CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Activity/(ies) undertaken in accordance with the approved CSR plan. Moreover, any surplus arising from any CSR Activity/(ies) shall be used for CSR. Any surpluses arising out of CSR Activities shall be re-deployed back into CSR Activities and will not form a part of the business profits of the Company. Further, if the Company spends an amount in excess of the requirements provided under the provisions of the Act, it may set-off such excess amount against the requirement to spend under this sub-section for such number of succeeding financial years and in such manner, as may be prescribed by the Act, from time-to-time.

H. General.

1. The power to interpret and administer the CSR Policy vest with the Chairman of the Governing Body whose decision shall be final and binding.
2. Any or all the provisions of this CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued by Government, from time to time.
3. The conditions or terms of this CSR Policy can be modified/ amended, cancelled or added in writing with the approval of Board. However, in the event of any conflict between the contents of this CSR Policy and the Act, the provisions of the Act shall supersede and will



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be made applicable to the matter. Further, the CSR Policy shall stand automatically amended in accordance with the amendments to the Act.

Adopted by the Governing Body at its meeting dated April 28, 2022