

Company's Policy on Corporate Social Responsibility

INTRODUCTION

When a business organisation possesses the ability to make the lives of people better and contributes in bringing harmony in the society by providing a level playing field, without any government regulations, such business organisation fulfills its responsibility towards society.

The term Corporate Social Responsibility (CSR) can simply be explained as small contributions made by any business organisation towards nation building in terms of children education, skill development, women empowerment etc.

Organisations working in private sector can do better quality work in fulfilling such responsibility and thereby support the government's mammoth task of bringing improvement in the society.

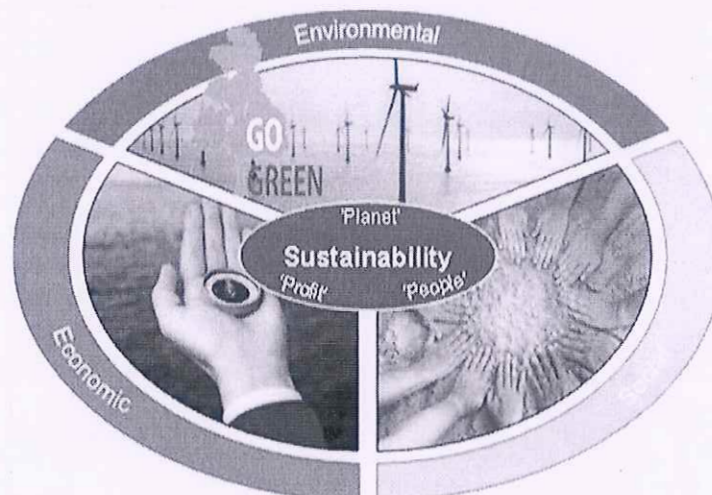
COMPANY'S PHILOSOPHY

At Ashiana, we believe, that trust and respect is earned through actions and not through words. For over three decades, this belief has encouraged us to strive harder and create higher benchmarks in delivery and service. For us Corporate Social Responsibility is not charity or mere donations, it is a way of conducting business, by which we contribute to the social good.

We have developed a set of principles known as Core Values to help guide our actions and ensure that our commitments to the neighbourhood and community are fulfilled to the highest standards whether for business or neighbourhood development. These Core Values are:

1. Going extra mile
2. Transparency
3. Happiness all around
4. Never give-up

The 3 Ps of Corporate Social Responsibilities



SCOPE OF ACTIVITIES

Ashiana Housing Ltd. is committed to the well being of the local communities and the society at large. The scope of activities which may be undertaken as part of the Corporate Social Responsibility Policy of the company shall include the following projects and programmes, in pursuance of recommendations of the CSR Committee of the Board, relating to:

- i) Projects or programmes relating to activities specified in Schedule VII to the Companies Act, 2013 read with present Rules and Regulations. Details of such projects or programmes are given in Annexure I to this policy;
- ii) Other projects or programmes relating to activities other than those activities specified in Schedule VII to the Companies Act, 2013.

STRATEGIES

The strategies for designing, implementing and monitoring the CSR activities of Ashiana Housing Ltd. are based on the following principles:

1. Build on core strengths – Designing and execution of programmes for CSR is part of the core strength of Ashiana .
2. Develop customized and need based programmes - To select such activities of CSR which are customised according to the needs of local community like, Education Programmes, Skill development, women empowerment, Infrastructure Development of Schools etc.
3. Engage in-house facility for roll out, execution and co-ordination of CSR activities – To formulate in house team to undertake CSR responsibilities with need based outside support/ collaboration.
4. Emphasize sustainability - To undertake activities under CSR having far reaching, lasting and sustainable result to the society.
5. Quality over quantity: Whatever we do we endeavour to add long and sustainable quality to the lives we touch.
6. Child education, skill development and area development (greenery): Education for children, skill development of labour working with us and external development of the area we are working in, are the bone of our CSR programmes.

INSTITUTIONAL SET UP

The Corporate Social Responsibility functions of Ashiana Housing Ltd. will be co-ordinated and monitored by a Corporate Social Responsibility Committee of its Board of Directors. The Committee shall consist of three directors and it may adopt two more members. The existing composition of CSR Committee is as follows:

1. Mr. Vishal Gupta – Chairman
2. Mr. Abhishek Dalmia –Member
3. Ms. Sonal Mattoo –Member

The CSR Committee will also be responsible for identifying appropriate opportunities/ projects for CSR as well as facilitating necessary processes for operationalizing the CSR projects.

Towards achievement of the CSR targets, the Corporate Social Responsibility Committee shall, *inter alia*, have the following roles to play:

1. Identify areas and opportunities for CSR activities within the broad framework outlined in this policy under the "Scope of Activities" given in Annexure 1;
2. Decide the manner of execution of CSR activities;
3. Design and draft a Policy Statement for CSR activities;
4. Design and draft the organisation structure of CSR on the lines given herein Annexure 2
5. Suggest roles and responsibilities of various functional heads as per the policy statement so designed and drafted, on the lines given herein Annexure 2
6. Selection of appropriate agencies/ NGOs for implementation of CSR activities on the lines of Companies Act, 2013 and Rules & Regulations there under
7. Provide necessary inputs for preparation of the Annual CSR plans
8. Supervision and monitoring of execution of CSR activities and quality of work and reporting on the same to the Board of Directors
9. Review, co-ordinate and assist in operationalization of Annual CSR plans.

IMPLEMENTATION MECHANISM

The implementation of CSR activities will be done through a separate department namely CSR Department having a Head and other executive(s) dedicated for this purpose. This department will work under the direct monitoring of CSR Committee. However, for execution of various CSR activities at different business/ project locations concerned Vice Presidents are, *inter alia*, direct in charge of such activities. These Vice Presidents have their own team of General Managers and other line managers to execute, monitor and report on the CSR activities and programmes designed and crafted by the company. The CSR activities and programmes are guided by its policy statement. The CSR policy statement and organization structure for CSR activities is given in Annexure 2 to this policy.

However, the CSR Committee will be responsible for overseeing the planning, coordination and implementation of CSR activities of the company across all business/ project locations.

ALLOCATION OF FUNDS

- (a) The CSR Budget, in every financial year, shall be as may be prescribed by the concerned Ministry / authorities under the Companies Act, 2013 and Rules and Regulations made there under. However, the modalities of spending of CSR budget shall be decided by the CSR Committee.
- (b) The CSR Committee will be responsible for co-ordinating necessary audits and other compliances of all the CSR activities which can also be done through the engagement of experts.

(c) The surplus arising out of CSR projects or programs or activities shall not form part of the business profit of the Company.

REVIEW AND MONITORING

CSR Committee will meet once in a quarter to review the progress of the overall activities determined by the CSR Committee whether the same are progressing as per agreed targets and timelines. An annual report of the activities undertaken under the CSR initiatives will be prepared by CSR Committee. The CSR Committee will monitor the progress on programmes and activities of CSR through a mechanism which will include, inter alia, following:

- a) Reports through MIS
- b) Visit at site where activities and programmes of CSR have been going on, whenever required
- c) Meeting of CSR personnel
- d) Calling for other records and reports to serve special need of the committee

However, efforts will be made to ensure that reports are tangible and the CSR results are measurable which may include the number of beneficiaries and impact on their lives to highlight the qualitative impact of the CSR initiative taken by the company. CSR Committee shall regularly evaluate and make assessment of the CSR activities.

DISPLAY

CSR Policy including a presentation of CSR activities will be displayed on company's website at www.ashianahousing.com. Further, an update of CSR activities of the company will also be disseminated through company's newsletter.

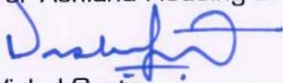
GENERAL

The Committee reserves the right to modify, cancel, add, or amend any of the above contents of this policy but subject to the approval of Board of directors of the company. And the company reserves its right to promote its brand while doing CSR activities so that more people are encouraged to join the cause served by CSR work.

Any or all provisions of the CSR Policy shall be subject to revision/amendment in accordance with the Companies Act, 2013 and any notifications on the subject as may be issued by the Ministry of Corporate Affairs, from time to time.

In case of doubt with regard to any of the provision of the Policy and also in respect of matters not covered herein, the interpretation & decision of the Board of directors of the company shall be final.

For Ashiana Housing Ltd.



Vishal Gupta

(Chairman - Corporate Social Responsibility Committee)

Annexure 1

Activities which may be included by companies in their Corporate Social Responsibility Policies as per Schedule VII of the Companies Act, 2013

Activities relating to:—

- (i) Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- (ii) Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly and differently able 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 group;
- (iv) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resource and maintaining quality of soil, air and water;
- (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 arts and handicrafts;
- (vi) Measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) Training to promote rural sports, nationally recognised sports, Paralympics and Olympic sports;
- (viii) Contribution to the Prime Minister's National Relief 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;
- (ix) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) Rural development projects.

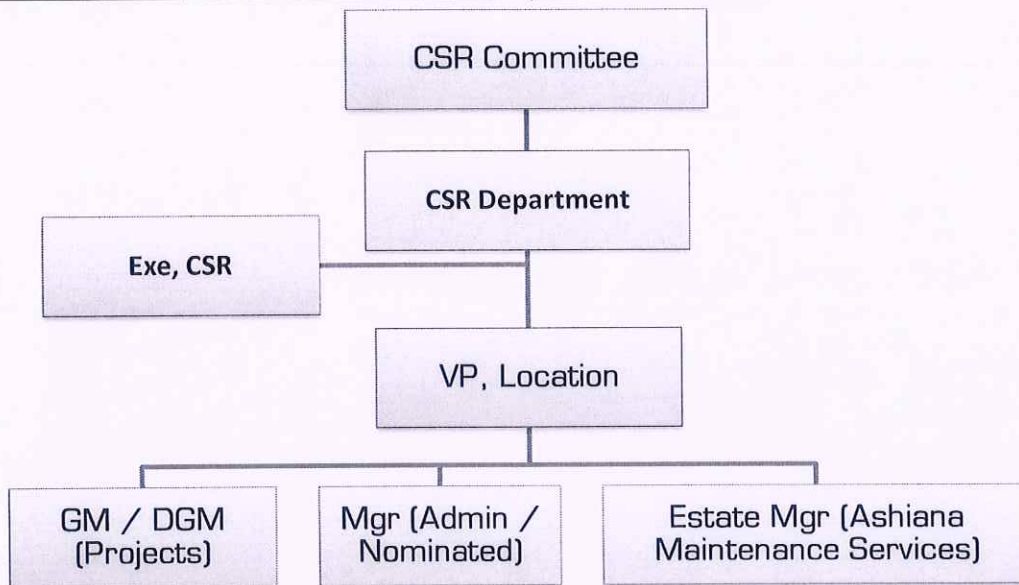
Annexure - 2

Corporate Social Responsibility: Policy Statement

Ashiana Housing Ltd. believe that CSR is a responsibility of corporate towards human spectrum within which it operates by rendering support for the upliftment of the society, in terms of living conditions, education, environment or any other issue. We believe and are committed to maintain the highest standards of corporate social responsibility guided by our core values which are as under:

1. Going extra mile
2. Transparency
3. Happiness all around
4. Never give-up

Organization Structure (CSR Committee to be on top of this structure)



Roles & Responsibilities

➤ HOD, CSR Department

- Act as internal subject matter expert on CSR
- Represent company externally on CSR
- Manage relationships with external parties on CSR
- Develop and coordinate all CSR initiatives of the company
- Implement CSR strategy and plan of the company
- Manage CSR reporting procedures within the company
- Celebrate CSR achievements.
- Inspire and educate employees, by reaching out on a personal level, to take up challenges of CSR.

➤ VP, Location

- Be owner of CSR plan of location
- Recommend CSR activities to HO, relevant to location
- Implement CSR plan and be accountable for it
- Establish CSR, KPI for all employees associated directly with CSR
- Sub-allocation of CSR funds, received from HO, to various CSR activities
- Coordinate cross-functional efforts on CSR, where needed

➤ **GM / DGM (Project)**

- Assist in implementation of CSR initiatives of location by:-
 - Provision of skilled, semi-skilled & skilled work force and supervisory staff on requirement;
 - Meet the laid down target for making available workers for 'unskilled to semi-skilled' training and for 'semi-skilled to skilled training';
 - Be responsible for and execute all greening activities under CSR, in the near vicinity of under construction project

➤ **Manager (Admin /Nominated)**

- Act as nodal point for all CSR activities at location level
- Implement CSR initiatives of the location under guidance of VP
- Coordinate with construction, purchase & accounts departments & subsidiary company(ies) of Ashiana Housing Ltd. for all CSR initiatives
- Generate all CSR reports of location and submit to HO

➤ **Estate Manager (Ashiana Maintenance Services Ltd. i.e. AMSL)**

- Implement all CSR initiatives in and around AMSL project sites
- Coordination of all CSR effort with Manager (Admin/Nominated)
- Submission of all reports on CSR activities to CSR nodal point at location

CSR Activities

This will include – Training & Education, Environment Upkeep, Medical, Miscellaneous Activities

➤ **Training and Education**

- **Training**
 - Unskilled to semi-skilled training
 - Semi-skilled to skilled training
 - Set up of vocational training institute
- **Education**
 - Establishment and running of Phulwari – school for children of labourers at project sites
 - Basic education
 - Provisioning of play equipment
 - Provisioning of uniform
 - Mid – day meals under government scheme, without responsibility of accounting
 - Development of infrastructure of local school

➤ **Environment Upkeep**

- Tree plantation
- Tree maintenance
- Erection & maintenance of tree guards
- Development of local public parks
- Development of roads, round about, berms, central verges

➤ **Medical**

- Organization of blood donation camps
- Medical OPD / check up facility at school

➤ **Miscellaneous Activities**

- Specific projects based on local requirements and sensibilities
- Donations to NGOs & hospitals from Directors Fund

However, the following activities undertaken for the welfare of labourers shall NOT form part of CSR activities:-

- Improvements in quality of living of labourers
- Medical check up of labourers
- Barber facilities for labourers
- Screening of films for labourers
- Any other activity directly targeting welfare of labourers working at project sites

Monitoring

- Monthly – CSR MIS
- Activities conducted
- Expenditure incurred
- Running expenditure vis a vis budget

➤ **Yearly – Consolidation of all activities conducted throughout the year**

Budgeting

➤ **Fund Allocation**

- Top down
- Company – 2% of PAT of previous FY; decided by May in each year
- Allocation to various activities and locations under overall Yearly CSR plan of company
- Sub allocation to VP, Locations for direct utilization for miscellaneous activities, with primary expenditure restricted to organizations registered under Section 80(G) of IT Act

➤ **Activity**

- Activities scheduled for forthcoming FY decided by February of each year, along with tentative costing
- Final costing