

**CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY  
OF  
ELEKTROMAG DEVICES PVT LTD**

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**1. Preamble**

The management of the Elektromag Devices Pvt Ltd ("the Company") strongly believes that those who are privileged to have wealth should contribute significantly to try and create a better world for the millions who are far less privileged.

The concept of Corporate Social Responsibility (CSR) has gained prominence from all avenues. Various Organizations have realized that Government alone will not be able to get success in its endeavor to uplift the downtrodden of Society. With the rapidly changing corporate environment, more functional autonomy, operational freedom etc. the Company has adopted CSR as a strategic tool for sustainable growth. For the Company in the present context, CSR means not only investment of funds for Social Activity but also Integration of Business processes with Social processes.

**2. OBJECTIVE :**

This Policy has been formulated in compliance with Section 135 of the Companies Act, 2013 read along with the applicable rules thereto.

**3. SCOPE:**

This Policy shall apply to all CSR projects/programmes/activities undertaken by the Company in India as per Schedule VII of the Act.

**4. DEFINITIONS:**

1. Corporate Social Responsibility (CSR) means and includes but is not limited to: Projects or programs relating to activities specified in Schedule VII to the Companies Act, 2013 ('Act').
2. CSR Policy relates to the activities to be undertaken by the Company as specified in Schedule VII to the Act and the expenditure thereon.
3. Net Profit means the net profit of the Company as per its financial statement prepared in accordance with applicable provisions of the Act (Section 198).

**5. AUTHORITY:**

The Board of the Company as per the amendments made vide insertion of Clause 9 in Section 135 of the Companies Act, 2013 is authorized to carry out and implement the CSR Policy and therefore authorized to undertake its CSR activities, through a registered trust or a registered society or a Company established under section 8 of the Act by the Company, either singly or along with its holding or subsidiary or

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associate company, or along with any other company or holding or subsidiary or associate company of such other company, or otherwise provided that – If such trust, society or company is not established by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, it shall have an established track record of three years in undertaking similar programs or projects/activities;

#### **6. CSR ACTIVITIES FOR IMPLEMENTATION:**

The CSR Activities would be chosen for implementation by the Company in compliance with the provisions of Section 135 read together with Schedule VII of the Companies Act, 2013.

#### **7. CSR MONITORING AND REPORTING FRAMEWORK :**

In compliance with the Act and to ensure funds spent on CSR Activities are creating the desired impact on the ground a comprehensive Monitoring and Reporting framework has been put in place. The Board shall monitor the implementation of the CSR Policy through periodic reviews of the CSR activities. The respective CSR personnel will present their annual budgets along with the list of approved CSR activities conducted by the Company to the Board together with the progress made from time to time as a part of the evaluation process under the monitoring mechanism.

#### **8. INVITEES TO MEETINGS:**

The Board may invite and secure attendance of third parties with relevant experience and expertise at the board meetings in which CSR proposal are to be discussed, reviewed and finalized.

#### **9. POWERS & DUTIES OF THE BOARD IN RELATION TO CSR:**

- a. Formulate and recommend, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of Companies Act, 2013;
- b. Formulate and recommend an Annual Action Plan in pursuance of its CSR Policy, which shall include the following, namely :
  - i. The list of CSR Registered organisations, undertaking projects or programmes where Board decides to contribute towards the corpus. ;
  - ii. The list of CSR projects or programmes that are approved to be undertaken in selective areas or selective subjects specified in Schedule VII of the Act ;

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- iii. The manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4 ;
  - iv. The modalities of utilization of funds and implementation schedules for the projects or programmes ;
  - v. Monitoring and reporting mechanisms for the projects or programmes ; and
  - vi. Details of need and impact assessment, if any, for the projects undertaken by the company.
- c. Recommend the amount of expenditure to be incurred on the activities referred to in clause (b) and ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.
- d. Monitoring and ensuring implementation of the projects/programs. Activities proposed to be undertaken by the Company.

#### 10. AMENDMENTS:

This policy shall be updated or amended from time to time, by the Company in accordance with the amendments, if any, to the Companies Act, 2013, rules made there under or any other applicable enactment for the time being in force via resolution passed by the Board.

#### 11. CSR REPORTING:

The Board Report of a Company shall include an Annual Report on CSR containing particulars specified in Annexure to the CSR Rules as per the prescribed format.

#### 12. MISCELLEANOUS

- (a) Any or all provisions of CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from time to time under the provisions of section 135 of the Act.
- (b) In the event of any conflict between the provisions of CSR Policy and the applicable provisions of the Act, the provisions of the Act shall prevail.
- (c) The Company reserves the right to modify, cancel, add or amend any provisions of this policy.
- (d) This policy shall be updated from time to time, by the Company in accordance with the amendments, if any, to the Companies Act, 2013, rules made there under or any other applicable enactment for the time being in force.

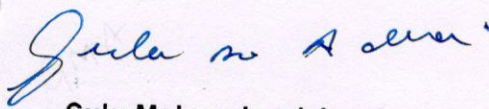




**Activities to be undertaken by the company as specified in Schedule VII of Companies Act, 2013**

- i. eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and "including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation" 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 enhancements 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. Contributions to public funded Universities, National Laboratories and autonomous bodies established under Department of Science and Technology (DST); Ministry of Electronics and Information Technology.

**For and on behalf of the Board of Directors of  
Elektromag Devices Private Limited**



**Gulu Mohansing Advani  
DIN:01030327  
Managing Director**



**Navin Moti Advani  
DIN: 01033405  
Director**

