



POLICY FOR CORPORATE SOCIAL RESPONSIBILITY

I. SHORT TITLE

This policy in relation to the Corporate Social Responsibility ("CSR") of *BPTP Limited* is titled as the "CSR Policy" and shall include any alterations, amendments or modifications hereto from time to time.

II. VISION STATEMENT, OBJECTIVE AND APPLICABILITY

1. Our vision is – "to actively contribute to the social and economic development of the communities in which we operate and to build a better, sustainable way of life for the weaker sections of society and raise the country's human development index".
2. To attain its objectives in a professional and integrated manner, the Company strives to –
 - Undertake proactive engagement with stakeholders to actively contribute to the socio-economic development of periphery/ community in which it operates.
 - Create a positive footprint within the society by creating inclusive and enabling infrastructure/ environment for livable communities.
 - Ensures environment sustainability by adopting best ecological practices and encouraging conservation/ judicious use of natural resources.
 - Focus on educating the girl child and the underprivileged by providing appropriate infrastructure and groom them as future value creators.
 - Emphasize on providing basic nutrition/ health care facilities
 - Facilitate water conservation by reducing water consumption in the projects and taking up rain water harvesting projects.
3. This CSR Policy has been framed in accordance with the applicable provisions of the Act and the rules issued thereunder.
4. Notwithstanding anything to the contrary contained in this CSR Policy but subject to applicable law, in the event that the Company fails to meet the thresholds set out under Section 135(1) of the Act during the immediately preceding financial year, it shall not be required to:
 - (i) Constitute/maintain the CSR Committee; and
 - (ii) Comply with the provisions of this CSR Policy till such time as it again meets the criteria specified in Section 135(1) of the Act.

III. DEFINITION AND INTERPRETATION

1. "Act" means Companies Act, 2013 along-with Rules.
2. "Board" means the Board of Directors of the Company.
3. "Company" means BPTP Limited.
4. "CSR Activities" means such projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business.

BPTP Limited

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5. **"CSR Committee"** means a committee constituted by the Board of Directors in its meeting held on June 30, 2014 or as re-constituted from time to time in terms of Section 135 of the Act and the CSR Rules.
6. **"CSR Rules"** mean the Companies (Corporate Social Responsibility Policy) Rules, 2014 (includes any amendment thereof).
7. **"CSR Expenditure"** means the amount recommended by the CSR Committee to be incurred on the CSR Activities in India in terms of the Act and the CSR Rules as approved by the Board from time to time.
8. **"Director"** means a member of the Board of Directors of the Company.
9. **"Implementing Agency"** means an implementing agency as defined under paragraph IV (2).
10. **"Implementation Group"** means an implementation group as defined under paragraph IV (1).
11. **"Net Profits"** means the net profit of the Company calculated as per Section 198 of the Act (or the provisions of the Companies Act, 1956, if then applicable), but shall not include (i) any profit arising from any overseas branch or branches of the Company (whether operated as a separate company or otherwise); and (ii) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act.
12. **"Society"** means a society registered under the Societies Registration Act, 1860 or any other applicable law in India.
13. **"Trust"** means a trust registered under the Indian Trusts Act, 1882 or any other applicable law in India.

Any term not defined above, shall have the meaning assigned to it under the Act or the CSR Rules.

IV. APPROACH TO IMPLEMENTATION

1. The CSR activities will be driven by a dedicated project team/group (the **"Implementation Group"**) under the guidance and support of the CSR Committee and the Board for implementation of the CSR Activities. The CSR Committee will play a significant role in ensuring that the CSR initiatives are in line with the said Policy.
2. Mode of Implementation: The CSR Activities may be undertaken by the Company by directly implementing any project approved by CSR committee/Board or through the following Implementation Group:
 - (i) Through a Trust, or a Society or a company established by the Company either singly or its holding or subsidiary or associate company or alongwith any other company or holding or subsidiary or associate company of such other company, or under Section 8 of the Act or otherwise; and/ or
 - (ii) Through a Trust, or a Society or a company established under section 8 of the Act with an established track record of three years in undertaking similar programs or projects; and/ or
 - (iii) In collaboration with other companies/ industry Body coordinating such activities or NGOs

(iv) Contribution to PM Relief Fund or any other fund as may be notified by Govt.

(the entities referred to under sub-clause (i) and (ii) above, are hereinafter referred to as "**Implementing Agencies**").

3. The Board shall empower the Implementation Group to finalize, approve and execute various agreements, deeds, writings, confirmations, undertakings or other documents, as may be necessary, under the Common Seal of the Company or otherwise, with any party including Implementing Agencies and/or others for the purposes of the CSR Policy and accept modifications, changes and amendments to any such documents/ agreements as it may deem fit.
4. In case of failure to ensure the minimum CSR Expenditure, detailed reasons for the same shall be submitted by the Implementation Group to the Board, who shall include the same in their report.

V. CSR EXPENDITURE

1. The total budget for the CSR projects will be recommended by the CSR Committee in accordance with applicable provisions of the Act and the CSR Rules and the Board shall ensure that the amount sanctioned for the CSR Expenditure is available to the Implementation Group for application towards the CSR Activities.
2. The Board contends a designated officer from the finance department who provides the relevant financial data and such other necessary details to the CSR Committee, to enable the Committee to recommend such amount of CSR Expenditure to the Board.
3. The Board endeavors that the CSR Expenditure in a financial year is at least at two per cent of the average Net Profits of the Company made during the three immediately preceding financial years and any surplus arising out of the CSR Activities shall only be re-allocated to the CSR activities and shall not form a part of CSR expenditure.
4. Any amounts incurred while undertaking activities in pursuance of normal course of business of a Company or on an item not in conformity or in line with activities set out in Schedule VII of the Act, will not form a part of CSR Expenditure.
5. The Board shall ensure that expenditure, if any incurred towards any capacity building exercise internally or of Implementing Agencies through institutions with established track record of at least three financial years, as the case may be, shall not exceed five percent of the CSR Expenditure in one financial year.

VI. CSR ACTIVITIES

1. The Board shall ensure that the CSR Activities that are undertaken by the Company should be within the scope of the following activities:

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to Swachh Bharat Kosh set up by the Central Government for the promotion of sanitation and making available safe drinking water;
 - (ii) Promoting education, including special education and employment enhancing vocation skills especially among children, woman, elderly, and the differently abled 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 back ward groups;
 - (iv) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, 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;
 - (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 windows and their dependents;
 - (vii) Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
 - (viii) Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for social-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;
 - (xi) Slum area development
 - (xii) Such any other activities as may be notified by the relevant authority under Schedule VII of the Act.
2. The CSR Activities will be undertaken in and around the local areas where the Company operates.
 3. The CSR Committee shall provide recommendations to the Board with respect to specific CSR Activities within the scope of the activities specified under paragraph VII (1) above that may be undertaken by the Company.
 4. The following details of any CSR Activities to be undertaken by the Company shall be presented to the Board by the CSR Committee along with its recommendations:
 - (i) The objectives and expected results of the CSR Activity;
 - (ii) The relevant sector and the nature of the CSR Activity;
 - (iii) The focus area/ location for implementation of the CSR Activity;
 - (iv) The amount to be allocated towards the CSR Activity;
 - (v) The indicative timelines for completion of the CSR Activity;
 - (vi) Whether the CSR Activity should be undertaken by the Implementation Group or any Implementing Agency or in collaboration with any other company; and

- (vii) Such other details as it may deem necessary.
5. In case any of the CSR Activities to be undertaken are anticipated to be long term, then a detailed estimate on implementation schedule or milestones shall be submitted by the CSR Committee to the Board.
6. Based on the recommendations of CSR Committee, the Board shall approve the following:
- (i) The specific CSR Activities that should be undertaken by the Company from time to time;
 - (ii) The amount that must be deployed towards such CSR Activity;
 - (iii) Whether the CSR Activities will be undertaken directly by the Company or through an Implementing Agency or in collaboration with any other companies [and record reasons for the same].

VII. MONITORING

a. Governance

In compliance with requirements of Section 135 of the Act, the Company has constituted a robust and transparent governance structure to oversee the implementation of CSR policy.

b. Responsibilities of CSR Committee

1. To ensure that the objectives of the said policy and the amount sanctioned towards CSR activities should be reported by the Implementation Group to the Board as well as CSR Committee on an annual basis in such manner as the Board may direct.
2. Outline the progress of the CSR activity on annual basis by Implementation Group if such activities are carried out by an implementing agency and provide the progress report to the Board in such manner as the Board may direct.
3. On review of such progress report by the CSR committee, the said committee shall provide the deliberations and recommendations to the Board, as may deemed necessary.
4. Notwithstanding anything to the contrary, the Board shall not be obliged to comply with the recommendations of the CSR Committee.

c. Progress report on CSR activities

In reference to clause 2 of point b, the progress report indicates:-

- Achievement since last progress report in terms of coverage compared to the target and reasons for variance, if any
- Actual year to date spends compared to the approved CSR allocation and reasons for variance.

- In respect of activities undertaken through Section 8 Company/ Trust/ Society/ NGO's periodic reporting mechanism of progress on each such activity and the amount incurred thereon.

VIII. REPORTING AND RECORD KEEPING

1. The CSR Committee shall maintain proper minutes of all its meetings.
2. The Board's report of the Company shall include an annual report on CSR containing the particulars as may be prescribed from time to time under the Act and the CSR Rules.
3. The Board will be responsible to ensure that:
 - (i) The report of the Board includes the annual report on CSR Activities of the Company and sets out the requisite information in terms of the Act and the Rules;
 - (ii) The contents of the latest and updated version of the CSR Policy is included in the report of the Board;
 - (iii) The contents of such policy are also made available on the website (if any) of the Company as per the particulars specified in the Annexure A.
 - (iv) In case of failure to ensure the minimum CSR Expenditure, detailed reasons for the same shall be disclosed in the Board Report.

IX. AMENDMENT

The Board may, subject to compliance with applicable law, at any time alter, amend or modify the CSR Policy as it deems fit to comply with the statutory obligation of the Company to undertake the CSR Activities.