

Annexure A

OMKARA ASSETS RECONSTRUCTION PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

CSR in India has traditionally been seen as a philanthropic activity. While the corporate houses have been engaged in doing CSR activities voluntarily, the new CSR provisions put formal and greater responsibility on companies to set out clear framework and process to ensure strict compliance.

The Companies Act, 2013 (hereinafter referred to as 'the Act'), has introduced the idea of CSR to the forefront and it mandates qualifying companies to constitute Corporate Social Responsibility Committee to effectively monitor CSR activities of a Company.

Further the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as "CSR Rules") lay down the framework and modalities of carrying out CSR activities which are specified in Schedule VII of the Act.

Accordingly, our company decided to focus mainly on the following activities to be referred to as CSR activities.

- Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- 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.
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, 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.
- 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 art and handicrafts.

- Measures for the benefit of armed forces veterans, war widows and their dependents.
- Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports.
- Contribution to the prime minister's national relief fund or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women.
- Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- Rural development projects.
- Slum area development.
- Disaster management, including relief, rehabilitation and reconstruction activities.

Modalities and Implementation Schedule for execution of projects or programs for CSR activities:

Omkara Assets Reconstruction Private Limited, the Company, will undertake its CSR activities either directly or through Trust floated by the company functioning in the group or through a Registered Society or established by another company under Section 8 of the Companies Act, 2013 or even to collaborate with other entities. The implementation Schedule for CSR activities will be dependent on the availability of eligible projects.

Governance:

- The CSR Committee shall identify the CSR programmes and activities to be undertaken by the Company and recommend the same to the Board for its approval, along with the financial outlay.

- The CSR Committee shall review and monitor the progress of implementation of the CSR programmes and activities and shall also update the Board on the status of such implementation.
- The CSR Committee shall monitor the CSR Policy of the Company from time to time

Expenditure:

- The Company shall spend, in every financial year at least 2% of the average net profits of the Company made during the 3 immediately preceding financial years for CSR Policy.

For this purpose, "average net profit" shall be calculated in accordance with provisions of Section 198 of the Companies Act, 2013, after deducting therefrom the dividends that may be received from companies in India which are covered under and complying with the provisions of Section 135 of the Companies Act 2013.

- The Company will give preference to the local area(s) in and around our offices in India.
- Any unspent amount of CSR spends on any 'ongoing project' fulfilling prescribed conditions to be transferred to an 'Unspent Corporate Social Responsibility Account' (Unspent CSR Account) in a scheduled bank within 30 days from the end of the financial year and such amount must be spent on CSR obligation within a period of 3 financial years from the date of transfer.

If the money in the Unspent CSR Account has not been so spent, the amount should be transferred to any of the following funds viz., Swachh Bharat Kosh / Clean Ganga Fund / Prime Minister's National Relief Fund at the discretion of the Company, within 30 days of the completion of the 3rd financial year.

Any unspent amount of CSR spends (other than for 'ongoing projects') shall be transferred to the aforesaid funds within a period of 6 months from the end of financial year.

Monitoring Process:

The Company Secretary shall submit a report to the CSR Committee annually about the end-use of contributions made.
