

## **Corporate Social Responsibility Policy**

### **1. Background and philosophy**

Section 135 of the Companies Act, 2013, read with Rules thereto and circulars/ notifications thereon issued from time to time (“**CSR law**”) requires Incline Realty Private Limited to constitute a Corporate Social Responsibility (“**CSR**”) Committee. The CSR Committee is required, *inter alia*, to formulate and recommend to the Board, a Corporate Social Responsibility Policy, which shall indicate the activities to be undertaken by the Company and monitor the said policy from time to time.

Business organizations are part of the society and derive its inputs from the society and its output (in the form of products/ services) are also finally delivered in the society for consumption. In recognition that the business organizations are integral part of the society, CSR is a step further towards the objective of contributing towards the betterment of the society at large as part of the responsible unit of the society. The CSR law also recognizes that the CSR measures should be undertaken on sustained project based approach and not as a standalone one-off activity. This document contains the programmes/ projects/ activities (collectively “**CSR Activities**”) that shall be undertaken to comply with the CSR laws.

### **2. CSR policy**

Apart from various permissible avenues under the CSR law, following are the areas of emphasis for CSR Activities:

1. Slum re-development, housing for economically weaker sections.
2. Promotion of education, including by way of conservation, renovation of school buildings and classrooms.
3. Efforts towards eradicating hunger, poverty and malnutrition, fulfillment of nutritional requirements of the needy, promoting health care and sanitation, including by way of creation of aids and facilities for differently abled persons.
4. Efforts towards environment sustainability, including by way of undertaking clean and renewable energy project, conservation of natural resources, protection of flora and fauna, maintenance of ecological balance, including by way of adoption of green belts, gardens etc.
5. Contribution to Prime Minister’s National Relief Fund or such other funds as may be recognized under Schedule VII of Companies Act, 2013.

CSR Activities shall be undertaken by the Company in project/ programme mode and not as one-off events, save and except for contributions mentioned at paragraph 2(5) above.

Activities undertaken by the Company in pursuance of normal course of business of the Company shall not be considered as CSR Activities.

In pursuing the CSR Activities, the Company shall prefer the physical and economic areas from which it operates, and in all cases within India only, so as to monitor the activities and gauge the benefits arising therefrom from close quarters.

### **3. Implementation**

The Company may undertake its CSR Activities through Company's personnel or through external implementing agencies, including companies/ local government/ bodies/ NGOs/ citizen forums, having similar goals and fulfilling prescribed criterion, if any.

### **4. Governance and monitoring**

1. The CSR Committee will identify a team who will identify potential projects qualifying for CSR Activities as per this Policy.
2. The team will prepare a proposal of the project, including its budget, duration of project and submit such proposal to the CSR Committee.
3. The CSR committee shall review the proposal, get changes incorporated, if required, and if considered appropriate, recommend to the Board for its approval the proposal, including the budgeted expenditure for the project.
4. The Board will review the proposal put forth by the CSR Committee and, if considered appropriate, approve the same with changes, if any ("**CSR Plan**").
5. The CSR Committee shall keep the Board updated on the status of implementation of the CSR Plans.
6. Necessary disclosures relating to the Policy and CSR Plan will be disclosed in the Annual Report as required by the relevant rules and regulations.
7. The governance and monitoring requirements stated herein shall not apply for contributions to funds mentioned at paragraph 2(5) above.

### **5. CSR resources and expenditure**

The funds allocation for implementation of CSR Plan will be approved by Board at the time of approval of the CSR Plan by the Board.

The Company may collaborate with other Companies for CSR Activities, provided CSR Committee of all such companies are in a position to report separately on the CSR Activities so undertaken.

The Company will endeavor to spent in every financial year atleast 2% of the average net profits of the Company made during the three immediately preceding financial years.

CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Activities undertaken in accordance with the approved CSR plan. Contribution to corpus of a trust/ societies / Section 8 companies etc. created exclusively for undertaking CSR activities or where the corpus is created for exclusively for a purpose directly related to the CSR Activities approved under this Policy will qualify as CSR expenditure.

Any surplus arising from CSR Activities will not be treated as part of business profits but shall be used for CSR Activities. Any income arising from CSR Activities will be netted off from the CSR expenditure relating to that activity and such net amount will be reported as CSR expenditure.

Subject to the applicable regulations for the time being in force, the CSR Committee is empowered to carry forward such percentage of the unspent/ unutilized CSR allocation of a particular year, to the following year(s) as it may deem fit.