

**OJOS DEVELOPERS PRIVATE LIMITED**  
**Corporate Social Responsibility (“CSR”) Policy**

CSR Policy	
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Approved By	CSR Committee
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# **OJOS DEVELOPERS PRIVATE LIMITED**

## **Corporate Social Responsibility (“CSR”) Policy**

### **1. Context**

This Corporate Social Responsibility Policy (“CSR Policy”) is adopted by Ojos Developers Private Limited (hereinafter referred to as “ODPL” or “Company”) in accordance with Section 135 of the Companies Act, 2013, and other applicable provisions of law, including the rules, guidelines and regulations prescribed by the Government of India. The purpose of this policy is to guide the Company in fulfilling its social responsibilities in a manner that is aligned with the values of the organization and ensures its positive impact on society and the environment.

### **2. Title and Scope**

- a) This policy shall apply to the CSR initiatives and activities of the Company at various locations in India for the benefit of the society at large.
- b) This policy is in compliance of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (“CSR Rules”).

### **3. Objective**

The primary objective of the CSR Policy is to outline the activities, processes and initiatives the Company will engage in to support sustainable development, social well-being and environmental sustainability. These efforts are aimed at contributing to the betterment of communities, supporting disadvantaged groups and ensuring ethical practices in business.

### **4. Composition of CSR Committee**

The CSR Committee shall be comprised in accordance with the requirements of the Companies Act, 2013 and the Rules made thereunder (“CSR Committee”).

### **5. Undertaking CSR Activities and Guiding Principles**

As a corporate citizen of India, the Company aims to work towards inclusive and sustainable development of the community in and around its areas of operations and other parts of the country. The Company also recognizes the importance of external support for fulfilling its social responsibility. The Company will undertake its CSR activities as mentioned in **Schedule-1** of this policy document (“CSR Activities/Projects”), approved by the CSR Committee, through the Company itself or such other registered entity/organization engaged in the CSR Activities in accordance with the provisions of Companies Act, 2013. The guiding principles for selection, implementation and monitoring of CSR activities of the Company shall be

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as follows:

**A. Selection of CSR Activities/Projects**

- i. While CSR Activities of the Company may be carried out in any part of India, the Company shall give preference to the local areas around its operating area.
- ii. The Company shall not discriminate against the beneficiaries of the CSR Projects on any grounds including caste, creed, gender, race, religion, disability or sexual orientation but it may focus its CSR Projects to benefit the economically or socially weaker or marginalised sections of the society.
- iii. In order to make the desired impact on the society at large, the Company may synergize its CSR Activities/Projects with the initiatives undertaken by the Central/State Government, District Administration and Local Administration, as the case may be.

**B. Implementation of CSR Projects**

- i. The time period for implementation of a particular project will depend on the relevant provisions of the applicable laws.
- ii. The CSR Projects will be classified as under:

**Ongoing Project** - Multi-year CSR Project having timelines not exceeding three years excluding the financial year in which it is commenced and shall include CSR Project which was initially not approved as multi-year CSR Project but whose duration has been extended beyond one year by the CSR Committee of the Company based on reasonable justification (“Ongoing Project”), and

**Other Projects** – CSR Projects which are not Ongoing Projects will be treated as other projects / activities (“Other Projects”).

- iii. The CSR Projects shall be implemented with participation of local community and in consultation with local administration, wherever required.
- iv. The CSR Activities/Projects shall be executed by the Company itself and/or through various other registered entity/organization which fulfil the criteria and meet the requirements, as prescribed under applicable

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provisions of the Companies Act, 2013 and CSR Rules.

**C. Monitoring of CSR Activities**

- i. The CSR Projects to be monitored using appropriate monitoring tools that may include field visit(s), self-assessment report(s), impact assessment(s), periodical review(s) or any other appropriate mechanism.
- ii. The CSR Committee shall periodically monitor the progress of the CSR Projects.
- iii. In case of Ongoing Projects, the CSR Committee of the Company shall monitor the implementation thereof with reference to the project timeline and fund allocation.

**6. Responsibilities of the Committee**

The responsibilities of the CSR Committee include:

- i. Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken,
- ii. Recommending the amount of expenditure for the CSR activities, and
- iii. Monitoring CSR activities from time to time.

**7. Effective Date**

This policy is effective from 01<sup>st</sup> April, 2023.

**8. General**

The Company reserves the right to amend or annul this policy from time to time subject to the provisions of the Companies Act, 2013 and CSR Rules.

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**SCHEDULE-1**  
**(CSR Activities/Projects)**

<b>Sr. No.</b>	<b>Particulars</b>	<b>Sector in which the Activities/Project is covered</b>
1.	Education Initiatives	Promoting education including special education, employment enhancing vocational skills and livelihood enhancement projects
	a. Pre-primary & School Education	
	b. Technical and Vocational Education	
2	Poverty & Health Initiatives	Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and making available safe drinking water.
3	Rural Development Initiatives	Rural development projects
4	Health care and Sanitation Initiatives	Promoting Healthcare including preventive health care, sanitation and availability of safe drinking water
5	Employability and Empowerment	Empowerment of women, reducing inequality faced by socially and economically backward groups
6	Environmental Sustainability, Animal Welfare and Soil Health Initiatives	Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry and maintaining quality of soil, air and water
7	Disaster Management	Disaster management, including relief, rehabilitation and reconstruction activities
8	Promotion of Sports	Training to promote rural sports, nationally recognized sports, paralympic sports and olympic sports