



GEEKAY WIRES LIMITED

**GEEKAY WIRES LIMITED
CORPORATE SOCIAL RESPONSIBILITY (CSR)
POLICY**

(1) PREFACE

Corporate Social Responsibility (CSR) is the way and mean through which corporates can repay the obligations made by the Society by contributing the resources in its various forms as required for the efficient operation of the Business. Corporate Social Responsibility is strongly connected with the principles of sustainability. Organization should make decisions based not only on financial or operational factors, but also on the social and environmental consequences. Therefore, it is the core corporate responsibility of Geekay Wires Limited (hereinafter referred to as "The Company") to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

(2) SCOPE OF CSR POLICY

This Policy applies to all CSR projects that will be undertaken by the Company and shall fulfill all the requirements of Section 135 of the Companies Act, 2013. The Company shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act, 2013. This Policy will be periodically reviewed and updated in line with the relevant codes of legislation and best practices that can be adopted by the Company.

(3) APPLICABILITY

Section 135 is applicable to every Company including its holding or subsidiary having a net worth of Rs. 500 crore or more, OR turnover of Rs.1000 crore or more OR a net profit of Rs. 5 crore or more during the immediately preceding financial year. The Company has come under the purview of CSR from the Financial Year 2020-21.

(4) OBJECTIVE AND PURPOSE OF THE POLICY

The key purpose of this Policy is to:

- Outline the development areas in which the Company shall get involved in.
- Define governance structure for CSR management within the Company.
- Serve as a guiding document aiding in identification, execution and monitoring the CSR projects.
- Describe the treatment of surpluses from CSR activities.

(5) CSR OBJECTIVES:

In terms of the CSR rules issued by the MCA the Company will be focusing on undertaking the project /programs /activities listed below, as specified in Schedule VII to the Act excluding activities undertaken in pursuance of normal course of business of a Company:

- i. Eradicating hunger, poverty and mal-nutrition, promoting preventive health care and sanitation including contribution to the "Swachh Bharat Kosh" set-up by the Central Government for promotion of sanitation and making available safe drinking water;

- ii.** Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and 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 centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- iv.** Ensuring environmental sustainability, ecological balance, and 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” setup 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 widows and their dependents;
- vii.** Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- viii.** Contribution to Prime Minister’s National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Schedule 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.

(6) CSR COMMITTEE

The Company has constituted Corporate Social Responsibility Committee (the “CSR Committee”) in line with section 135 of the Companies Act, 2013 (the “Act”). The CSR Committee consists of following members of the Board:

- Mr. Ghanshyam Dass (Chairman & Managing Director)– Chairman
- Mr. Ashish Kandoi (Whole Time Director& CFO)- Member
- Mr. Bhagwan Dass Bhankhor(Independent Director) –Member

The CSR Committee of the Board shall be responsible for:

- Review of CSR activities in the Company.
- Formulation of CSR Policy.
- Monitoring of implementation of CSR Policy.
- Recommend to the Board, modifications to CSR Policy as and when required.
- Appraise to the Board the CSR expenditure done during the year.

(7) CSR BUDGET

The total budget for the CSR projects in each financial year will be decided by the CSR Committee in accordance with applicable provisions of the Act and the CSR Rules. The CSR Committee shall propose to distribute the budget among the Areas to Emphasize or such of them as the CSR Committee may deem fit in each financial year, in such proportion and in a manner that meets the objectives of the CSR Policy.

For any reason if the CSR team is not able to follow the allocation agreed on in any of the Areas to Emphasize described above, the same shall be utilized in such other Areas to Emphasize as the CSR team may recommend with the reasons thereof, and the CSR Committee may approve.

(8) IMPLEMENTATION PROCESS

+ CSR Contributions:

The Company will undertake to spend on its CSR activities every year, 2% of its average Net Profits during every block of three years*. 'Net Profit' shall be calculated in the manner prescribed by the Act and the CSR Rules. Any 'Income' or 'Surplus' that may arise from its CSR activities would also be included in the CSR corpus and will not form part of business profits of the Company. The CSR activities of the Company shall not include any benefits which are exclusively for the employees of the Company or their family members.

**where the company has not completed the period of 3 financial years since its incorporation, during such immediately preceding financial year.*

Provided that the company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR Activities.

+ Compliance, Monitoring and Reporting

(i) Compliance

CSR Committee will plan, implement, monitor and manage all CSR projects & activities for Geekay Wires. The CSR Committee will formulate implementation plans for the projects specifying the following:

- Activities to be undertaken.
- Budgets proposed.
- Time frame for implementation.
- Responsibilities and authorities for implementation.
- Results expected to be achieved post implementation.

(ii) Monitoring

The CSR Committee will monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports etc. Mechanisms to track data and monitor projects will be established

to ensure the transparency and efficiency of the implementation process. The projects will be evaluated against the milestones defined in the implementation plan of the project.

(iii) Reporting

The CSR Committee of the Board will annually publish report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act 2013. The CSR Committee shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR Policy is in compliance with the approved CSR Policy of the Company.

The CSR Policy on being approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

(9) TREATMENT OF SURPLUS

Any surplus generated from CSR projects undertaken by the Company will be tracked and channelized into Company's CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.

(10) AMENDMENTS OF THE CSR POLICY

The Board of Directors of the Company shall have the powers to revise/modify/amend this Policy from time to time, as the Board may think fit, based on the recommendations to be made by the CSR Committee to confirm to the revision/amendment, if any, to be made to the CSR Rules by the MCA, under the Act.