

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Introduction:

DHRUV Consultancy Services Limited (“DHRUV”) was incorporated under the Companies Act, 1956 on 26th August, 2003.

DHRUV has a Vision “To generate profitable growth and become one of the leading infrastructure consultancy firm/company that lasts generations.”

and Mission that “With diligence towards work achieve quality, reliability, timeliness and serve the client beyond expectations.”

2. Definitions:

Unless the context so requires, the terms used herein shall have meaning assigned herein:

(i) “Act” means Companies Act, 2013.

(ii) “Average Net Profit” shall have the same meaning as prescribed in Section 135 of the Act read with the Rules.

(iii) “Board” shall mean Board of Directors of DHRUV.

(iv) “CSR activities” shall mean the projects or programs or activities undertaken / to be undertaken by DHRUV as prescribed in Clause 5.

(v) “CSR Committee” shall mean a Committee duly constituted by the Board pursuant to provisions of Section 135 of the Act.

(vi) “CSR Policy” shall mean Corporate Social Responsibility Policy of DHRUV.

(vii) “DHRUV” or “Company” shall mean DHRUV Consultancy Services Limited.

(viii) “Rules” means Companies (Corporate Social Responsibility Policy) Rules, 2014 which were made effective from April 1, 2014, and as may be amended from time to time.

3. Scope:

The CSR relates to the activities to be undertaken by the Company as specified in Schedule VII to the Act and the expenditure thereon, excluding activities undertaken in pursuance of normal course of business of the Company.

4. Aims and Objectives:

As a responsible corporate entity, DHRUV will consistently strive for opportunities to meet the expectation of its stakeholders by pursuing the concept of sustainable development with focus on the following:-

- a) Integrate social goals and to address the aspirations of the Stakeholders, in line with the practice of sustainable development and inclusive growth;

- b) Be responsible and responsive corporate citizen through endeavors to create a safe, harmonious and ecologically balanced environment for its members and the community at large.
- c) Maintain commitment to quality, health and safety in every aspect of the business and people;

5. Activities under Corporate Social Responsibility:

DHRUV would endeavor to adopt an integrated approach to address the community, societal & environmental concerns by taking up projects or programs relating to the Schedule VII under Section 135 of the Act

6. Locations/Geography of CSR Activities:

The CSR activities will be primarily taken up in the immediate vicinities of DHRUV's Offices. Apart from immediate vicinity areas, CSR activities may also be taken up in urban, rural and tribal communities.

7. Undertaking CSR activities

The CSR activities will be carried out either by DHRUV itself or through Trust and/or any foundation as established or by a registered society or by a Company established under Section 8 of the Companies Act, 2013 (collectively hereafter referred to as "Agency").

8. Implementation Mechanism

While identifying the CSR activities, DHRUV and Agency would consider the following broad parameters while selection of projects or programs:

8.1 Preference should be given to the local areas and areas where DHRUV has its Offices and its projects.

8.2 CSR activities should be undertaken as project or program based rather than in the form of donation, so as to create social impact and visibility.

8.3 While implementing the identified projects or programs, time frames and milestones should be predefined.

8.4 CSR activities may be based on fundamentals of sustainable development

9. Planning and Co-ordination

9.1 The specific projects or programs will be identified and formulated based on need assessment surveys for identifying the specific areas of concern. Based on the survey, a detailed project or program report will be prepared by the Agency detailing the need for the specific project or program, time frame for implementation and budget.

9.2 The Company will prepare an annual plan for each year within the budgetary provisions and will be placed before the CSR Committee for recommendation to the Board for their approval.

9.3 The target beneficiaries, the local authorities, professionals and institutions etc. involved in similar activities if need be, may be consulted/ associated in the process of planning and implementation of the CSR activities.

9.4 Agency will hire professionals on need basis wherever considered necessary to plan and implement various projects.

9.5 The focus of delivering services /benefits will be in line with the CSR activities mentioned in this document and as per programs, projects and schemes approved.

10. Budget for CSR activities:

10.1 The CSR Committee shall, after the end of each financial year, recommend to the Board, the amount of expenditure to be incurred on the CSR activities.

10.2 The amount of such expenditure shall not be less than 2% of the Average Net Profits of the Company made during the three immediately preceding financial years.

10.3 The Company may build CSR capacities of its own personnel as well as those of their implementing agencies but such expenditure shall not exceed 5% of the total CSR expenditure of the Company in one financial year.

10.4 All administrative expenses including expenditure on wages and salaries, tours and travels, training and development of personnel deputed on CSR activities would be included in the amount of expenditure to be incurred on CSR activities.

10.5 The expenditure on CSR activities shall include all expenditure on projects or programs relating to CSR activities, but does not include any expenditure on an item not in conformity or not in line with CSR activities.

10.6 Based on the total approved Budget, the Managing Director/Executive Director of the Company would be authorized to allocate funds for different projects on the basis of identified CSR plans on yearly basis, under different budget heads for undertaking CSR activities.

11. Monitoring Process of CSR Policy:

11.1 The Company would be responsible for needs assessment of the surrounding locations, preparation of CDAP (Community Development Action Plan), implementation, reporting and monitoring on the physical and financial progress of the CSR activities on a regular basis.

11.2 Agency to form a team, comprising of such number of executives as may be required, in consultation with the Company, for implementation of CSR activities.

11.3 A group of members among HR department and Compliance department at the registered office would be identified for coordinating CSR activities and related responsibilities.

11.4 The implementation and progress of CSR activities shall be regularly monitored by the Companies senior management, preferably on a quarterly basis.

11.5 The CSR Policy shall be monitored by the CSR Committee from time to time, at least once in six months.

11.6 On advice of CSR Committee, selected CSR activities may be taken up for evaluation through an outside agency.

11.7 The CSR Committee would also provide required feedback and inputs to formulate and improve the projects or programs, from time to time, as per need and requirement.

11.8 Efforts will also be made to quantify the impact made by CSR activities, to the best possible extent, with the baseline data/existing status surveys developed before the start of any CSR activities.

12. Reporting:

12.1 A half yearly report on activities / projects identified / implemented shall be submitted to CSR Committee.

12.2 Based on the monitoring reports collected from Agency, the activities undertaken by the Company will be reported and form part of the Board's Report of the Company.

12.3 The Board of Directors of the Company will also be kept informed, from time to time, on the CSR activities undertaken by the Company.

13. General:

13.1 The surplus arising out of CSR projects or programs shall not form part of the business profits of the Company.

13.2 Any amendment or modification to the CSR Policy shall be approved by the Board on the recommendation of CSR Committee.

13.3 The contents of this Policy shall be disclosed in the Board's report and same shall also be displayed on the website of the Company.