

## **CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY**

### **BOOTES IMPEX TECH LIMITED**

#### **1. Introduction and Background**

- 1.1 The Corporate Social Responsibility Policy (“**CSR Policy**”) of Bootes Impex Tech Limited (“**Company**” and/or “**BITL**”) has been developed in accordance with the applicable provisions of the Companies Act, 2013 and the Rules thereunder (“**Act**”).
- 1.2 The CSR Policy will focus on initiatives falling within the purview of Schedule VII of the Act, which include, *inter alia*, education, health, safety and environment. BITL will strategically integrate long-term initiatives to support communities for its growth and development. BITL’s initiatives are aimed at achieving greater impact through its CSR projects and programs by judicious investment and use of financial and human resources and working with like-minded industry bodies and partners to contribute to the sustainable development of society.

#### **2. Objectives of the CSR Policy**

The Company’s primary objective through this CSR Policy is to contribute towards the social growth and development of the community. The Company is also looking to support and encourage employee involvement in community affairs, programs and offer opportunities to employees to make a positive impact on the community and provide a common platform to bring together employees from all functions. With heightened awareness of the importance of CSR to the Company’s reputation as a good corporate citizen, employees will be encouraged to participate in the Company’s CSR activities/projects/programs and give back to the society.

#### **3. Scope and Applicability**

The CSR Policy shall apply to all CSR projects / Programmes / Activities undertaken by the Company.

#### **4. CSR Focus Areas**

- 4.1 The Company’s focus areas for CSR activities is on the initiatives falling within the purview of Schedule VII of the Act, including but not limited to education, health, safety and environment.

CSR activities will not, however, include the following:

- (a) activities which benefit only the employees of the Company and their families;
- (b) contribution to any political parties;
- (c) activities undertaken outside the country; and

(d) activities undertaken in pursuance of the normal course of Company's business.

## **5. Financial Commitment**

5.1 For achieving the Company's CSR objectives through implementation of meaningful & sustainable CSR programs, the Company shall endeavor to allocate the following as its annual CSR corpus:

- (a) 2% of average net profits made during the three immediately preceding financial years, as prescribed under the Act and unspent amount, if any for any financial year carried forward to the next financial year;
- (b) any income arising therefrom; and
- (c) surplus arising out of CSR activities.

5.2 It is clarified that surplus arising out of CSR activities/projects/programs shall not form part of business profits of the Company.

## **6. Project Selection and Implementation**

### **6.1 Project Selection**

Projects shall be selected on the basis of need identification studies, internal need assessment or receipt of proposals. Projects shall be evaluated against goals and milestones defined for the project together with the implementing agency (if any).

### **6.2 Project Implementation**

6.2.1 The Board shall ensure that the CSR Activities are undertaken by the Company itself or through any of the following implementing agencies –

- 1. A Company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and approved under 80G of the Income Tax Act, 1961 (43 of 1961), established by the Company, either singly or along with any other Company; or
- 2. A Company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- 3. Any entity established under an Act of Parliament or a State legislature; or
- 4. A Company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and approved under 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

6.2.2 The implementation modalities may be modified from time to time.

6.2.3 The Company may engage international organisations for designing, monitoring and evaluation of the CSR projects or programmes as per this CSR policy as well as for capacity building of its own personnel for CSR.

6.2.4 A Company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with these rules.

6.2.5 The Board of a Company shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

6.2.6 In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and yearwise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

## **7. Annual Action Plan**

The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of this CSR Policy, which shall include the following, namely:-

1. The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act.
2. The manner of execution of such projects or programmes as specified in sub-rule (1) of Rule 4.
3. The modalities of utilisation of funds and implementation schedules for the projects or programmes.
4. Monitoring and reporting mechanism for the projects or programmes; and
5. Details of need and impact assessment, if any, for the projects undertaken by the company.

The Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

## **8. Web Link**

Weblink for the BITL's CSR Policy is <http://bootes.in/csr>. The CSR Policy will be available with any of the Director of the Company for review.