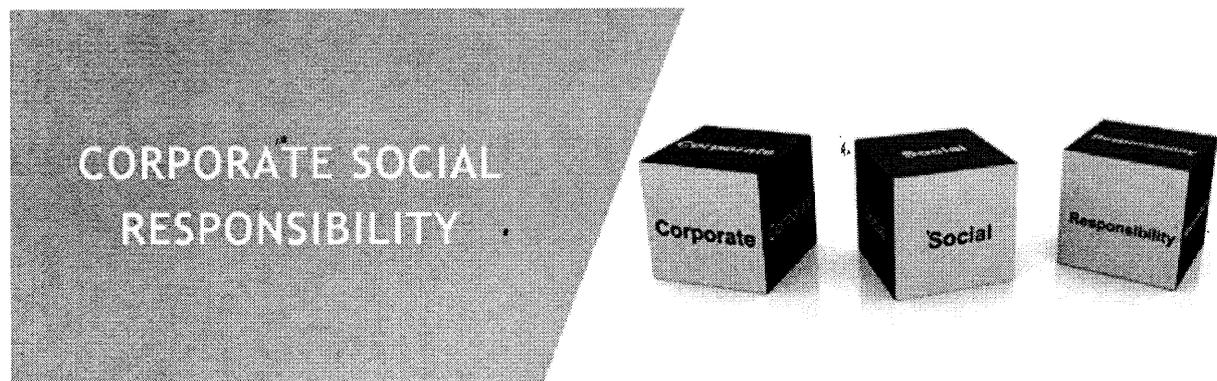


Agarwal Transport Corporation Private Limited CSR Policy



THE DUTY OF CORPORATE;

TO MAKE ENABLE ALL LIVING BEING;

TO GET A FAIR SHARE OF RESOURCES.

AGARWAL TRANSPORT CORPORATION PRIVATE LIMITED

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CSR

1. CORPORATE SOCIAL RESPONSIBILITY (CSR) PHILOSOPHY & CONCEPT:

Corporate Social Responsibility refers to the responsibility of Corporate to the society that extends beyond stakeholders or investors in the Organization. That's the responsibility of course is to make money or profits for the owners. These other social stakeholders typically include consumers, employees, the community at large, government and the natural environment.

Corporate Social Responsibility is strongly connected with the principles of Sustainability. An organization should make decisions based not only on financial factors, but also considering the social and environmental consequences. As a Corporate Citizen receiving various benefits out of society therefore it is the co-extensive responsibility to pay back in return to the society in terms of helping needy people by providing foods, clothes, promoting education, employment, sports etc., keeping the environment clean and safe for the society by adhering to the best industrial practices and adopting best technologies, and so on. It is the Company's intent to make a positive contribution to the society in which the Company operates.

2. PREAMBLE:

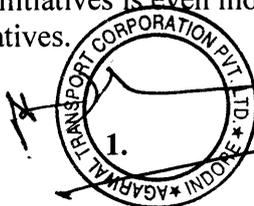
Promoters of the company are already involved in various social activities and actively contributing towards society especially in the following areas:

- Education;
- Healthcare;
- Medical;
- Women Empowerment;
- Child Care;
- Skill Development;
- Sports;
- Environment & Community Development;
- Animal husbandry etc.

Now, the Companies Act, 2013 has introduced the Concept of CSR to the forefront and through its disclose-or-explain mandate, is promoting greater transparency and disclosure. Schedule VII of the Act, which lists out the CSR activities, suggests communities to be the focal point. On the other hand, by discussing a company's relationship to its stakeholders and integrating CSR into its core operations.

Agarwal Transport Corporation Private Limited takes a step forward towards profitable growth; it also makes a sincere effort to bring the society a step forward through its social initiatives. In order to fulfill its responsibility towards the society the company invests a sizable part of its net profit towards the welfare of the society & the development of the country at large.

To earn from every penny, one invests in business is difficult but to yield the desired results from every penny invested in philanthropic initiatives is even more difficult thus in order to maximize the benefits to the society from its initiatives.



The Companies Act, 2013

In India, the concept of CSR is governed by Section 135 of the Companies Act, 2013, along with rules made there under. The CSR provisions within the Act are applicable to the companies with:

- Turnover of ₹ 1000 crore or more; or
- Net Worth of ₹ 500 crore or more; or
- Net Profit of ₹ 5 crore or more.

The Companies on which CSR is applicable they required to constitute CSR committee consisting of three or more Director, out of which at least one Director shall be an Independent Director.

The Act lists out a set of activities eligible under CSR. Companies may implement these activities taking into account the local conditions after seeking board approval. The indicative activities which can be undertaken by company under CSR have been specified under Schedule VII of the Act.

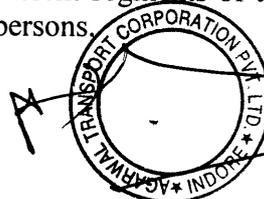
Quantum of Amount to be spent on CSR Activities:

- For achieving its CSR objectives through implementation of meaningful & sustainable CSR Programs, the Company will spend 2% of its average net Profits made during 3 immediately preceding financial years as its Annual CSR Budget.
- The Annual CSR Budget shall be spent on activities laid down in Schedule VII of the Act.
- Any surplus arising and/or additional revenue generated out of CSR Activities undertaken by the Company shall not form part of the business profit of the Company and same shall be spent for undertaking any CSR Activities only.

3. SHORT TITLE & APPLICABILITY:

This Policy, which encompasses the company's philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large, is titled as the "Agarwal Transport Corporation Private Limited CSR Policy". It has been prepared keeping in mind the Company's code of business ethics and to comply with the requirements of Companies Act, 2013 (hereinafter called as "the Act") and the Companies (Corporate Social Responsibility Policy) Rules, 2014, notified by the Ministry of Corporate Affairs vide Notification dated 27th February, 2014 and will be revised as and when required.

This Policy shall apply to all CSR initiatives and activities taken up at the various work-centers and locations of the Company, for the benefit of different segments of the Society, specifically the deprived, under-privileged and differently able persons.



4. COMPOSITION OF THE CSR COMMITTEE:

As the Corporate Social Responsibility is applicable accordingly the company formulate the CSR Committee which consist of with the following Director's:

| S.N | Name of Director | Designation | Position |
|------------|-------------------------|---------------------|-----------------|
| 1 | Mr. Vinod Kumar Agarwal | Director | Chairman |
| 2 | Mr. Anand Roop Sahu | Whole-Time Director | Member |

- Meeting: The CSR Committee meets as it deem necessary;
- Quorum: Quorum of meeting of CSR Committee shall be one third of the total strength or two directors, whichever is higher;
- Sitting Fees: No Sitting Fees will be given for attending the meeting;
- The CSR Committee may invite Executives, Advisors, representatives of Social Organizations, Auditors of the Company and such other person (s) as it may consider necessary to attend the meeting.

The constitution and composition of CSR committee is required to be disclosed in the Board Report (part of the Annual Report of the Company).

5. ROLE OF CSR COMMITTEE:

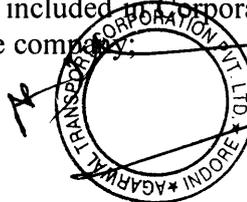
The Corporate Social Responsibility committee of the company shall:

- formulate and revise Corporate Social Responsibility Policy;
- recommend the amount of expenditure to be incurred on the CSR activities;
- identify and recommend the activities from Schedule VII in which CSR fund will be spend;
- monitor of Corporate Social Responsibility Policy of the company from time to time.

6. MONITORING MECHANISM:

The Board of the Company will act as Monitoring Mechanism of the CSR Committee and the Board shall-

- (a) approve and revise the CSR Policy as and when required;
- (b) ensure that the activities as are included in Corporate Social Responsibility Policy of the Company are undertaken by the company;
- (c) approve the CSR budget;



- (d) to ensure that the CSR expenditure done through the mechanism recommended by the CSR Committee;
- (e) to ensure the CSR fund spend which is required to spend as per Section 135 of the Act;
- (f) to co-ordinate with the agency and ensure that whether the CSR fund used in the activities for which it is given;
- (g) to ask agency, for furnishing any document, ledger or report in respect of CSR expenditure required by the Board;
- (d) disclose contents of such Policy in its report and also place it on the company's website, if any, in such manner as may be prescribed; and

7. CSR ACTIVITIES:

These are the following Prioritized area covered under Schedule VII through which, the Company decide to allocate CSR fund:

- ✓ EDUCATION;
- ✓ WOMEN EMPOWERMENT;
- ✓ SPORTS;
- ✓ HEALTH;
- ✓ MEDICAL;
- ✓ ANIMAL HUSBANDRY ETC.
- ✓ ANY OTHER ACTIVITIES WHICH COMES UNDER SCHEDULE VII OF THE ACT.

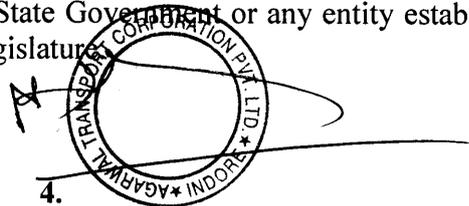
8. PROHIBITED ACTIVITIES UNDER CSR:

The Corporation will abstain from carrying out the following activities under CSR that may create dissatisfaction in any section of the Society:-

- i) Activities concerned with religion like construction of temple/mosque etc.
- ii) Activities disturbing social harmony in any manner.
- iii) Activities exclusively for the benefit of employees of the company or their family members.
- iv) Such other activities as may be prohibited by Central Government.

9. IMPLEMENTATION OF CSR ACTIVITIES:

- ✓ The Board along with the discussion with CSR committee decided to undertake its CSR activities through Registered Trust established by the Company singly or along with any other company and also by participating in the project involved in the activities mentioned Schedule VII.
- ✓ CSR activities can be initiated by a company established under section 8 of the Act or a registered or registered society
 - established by the company, either singly or along with any other company or
 - established by the Central or State Government or any entity established under an Act of Parliament or a state legislature



- ATC.
- Other than above shall have established track record of three year in undertaking similar programs or project.

10. CSR EXPENDITURE:

(a) The Company is required to spend, in every financial year, at least 2% of the average net profit of the company made during the three immediately preceding financial year.

(c) At the time of CSR expenditure preference will be given to the Local areas around it where it operates.

(d) Average Net Profit shall be calculated in accordance with the provision of Section 198 of the Companies Act, 2013.

11. CSR REPORTING:

The Company is required to report on CSR activities in the Board's Report (part of Annual Report) in Annexure which indicates:

- the amount required to be spent;
- the amount spend;
- if company fails to spend the amount then specify the reason for not spending the amount etc.

**The Company is required to disclose the CSR Policy on the website of the Company, if any.*

For Agarwal Transport Corporation Pvt. Ltd.

Vinod Kumar Agarwal
(Vinod Kumar Agarwal)
Director
DIN: 00136613

Anand Roop Sahu
(Anand Roop Sahu)
Whole-Time Director
DIN: 00364087

Date: 09/12/2016
Place: Indore

