



## CORPORATE SOCIAL RESPONSIBILITY POLICY

### 1. PREAMBLE

Being a Company, **Mukul Gupta Marketing Private Limited** ("the Company") understands the impact of its operations and activities on society at large. The Company is vigilant towards the corporate principles and responsibly to execute special campaigns for social upliftment and communal progress. The Company is committed to its stakeholders – government, investors, shareholders, associates, community, environment, employees and their families to conduct its business in a responsible manner that creates a sustained positive impact.

As an organisation, we have an intention to actively participate in the development of the communities where projects are located, which contributes to social and political stability in the areas where it operates.

With the introduction of the Companies Act, 2013 ("the Act"), constitution of a Corporate Social Responsibility ("CSR") Committee of the Board not mandatory for companies Where the amount to be spent by a company does not exceed fifty lakh rupees, and the functions of such Committee provided under this section shall, in such cases, be discharged by the Board of Directors of such company and formulation of a CSR Policy became a mandatory requirement. Therefore, the Company has formulated a CSR Policy which is in accordance with the requirements stipulated under the Act and encompasses its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs for the welfare & sustainable development of the society.

### 2. GUIDING PRINCIPLE FOR SELECTION, IMPLEMENTATION AND MONITORING OF ACTIVITIES

The Company is committed towards forging long standing collaborations and partnerships that focuses to achieve social, environmental and economic wellbeing. We aspire to partner with various government authorities, businesses, NGOs and communities to amplify our presence in CSR sphere. We believe that our engagement as responsible corporate citizen, would help our vision and mission of being India's one of the best Infrastructure Companies. The policy aims to contribute towards sustainable development of the society and environment and to create and ecosystem of overall well-being. Subject to the provisions of the Companies Act, 2013, the policy is expected inter alia to serve the following purposes: -

- i. To make significant contribution for the upliftment of society so that the social community can be amplified.
- ii. To promote education & empower women.



- iii. To uphold the values of good citizenship, through our own behavior, and by influencing other organizations to behave in a similar way.
- iv. To promote good CSR and citizenship practices among our members, officers, associates and partner organizations; providing training and education where required.
- v. Build active and long-term partnerships with the communities in which we operate to significantly improve social condition of the needy people.

### 3. FUNCTIONS OF BOARD

The Board shall:

- i. Formulate a CSR Policy indicating the activities to be undertaken by the Company in areas or subjects specified in Schedule VII of the Companies Act, 2013.
- ii. Recommend the amount of expenditure to be incurred on the activities referred to in clause (i); and
- iii. To formulate and recommend an annual action plan in pursuance of CSR Policy covering the following aspects:
  - a. List of approved Projects or Programs to be undertaken in areas or subjects specified in Schedule VII to the Act.
  - b. The manner of execution of such projects or programs as specified in rule 4(1) of CSR Rules.
  - c. Modalities of utilisation of funds and implementation schedules for the projects or programs.
  - d. Monitoring and reporting mechanism for the projects or programs, and
  - e. Details of need and impact assessment, if any, for the projects undertaken by the Company.
- iv. Recommend changes to the Board, if any, in the annual action plan with reasonable justification to that effect.
- v. Monitor the CSR Policy as approved by the Board from time to time.

### 4. CSR ACTIVITIES

CSR activities of the Company shall be undertaken either itself or through a Registered Trust, Society, Non-Government Organisation in accordance with the provisions of Companies Act, 2013 read with rules made thereunder. The Company may contribute/ support financially or otherwise, to the initiatives / activities / programmes for development of society and environment, particularly in the vicinity of the areas where offices/ project offices of the Company are located.

The CSR activities should be undertaken in the areas as enshrined in Schedule VII of the Companies Act, 2013 (as amended from time to time).

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## 5. CSR SPENDING

The Company shall endeavor to achieve the objectives of CSR Policy and allocate every year:

- i. Minimum 2% of its average net profits made during the three immediately preceding financial years.
- ii. Any income or surplus arising out of the CSR Activities, projects or programs shall not from part of the business profit of the Company and the same shall be ploughed back for use in the CSR Activities.

The CSR activities and their respective expenditure shall be recommended to the Board in the following manner:

- i. The Board shall identify the projects/ activities covered under Schedule VII of the Companies Act, 2013. The projects so identified shall be recommended to the Board in its Annual Action Plan for a Financial Year.
- ii. For projects/ activities identified by the Board during the Financial Year, the Board shall update the annual action plan and shall recommend the same to Board of Directors for approval thereof.

## 6. CSR REPORTING

The Board of Directors of the company shall satisfy itself that the funds disbursed for CSR Activities have been utilized 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.

The Board's Report of the company shall include an annual report on CSR containing particulars as specified under of Companies (Corporate Social Responsibility) Rules, 2014, as amended from time to time. The Impact assessment report, wherever applicable shall be placed before the Board and shall be annexed to the annual report on CSR.

## 7. AMENDMENT

The Board shall be fully responsible for the monitoring and review of the policy in accordance with applicable laws from time to time. The Board shall as and when it deems necessary to amend, modify or revise the CSR Policy.

The Board of Directors can amend, modify or revised the CSR Policy.

## 8. INTERPRETATION

Any word used in this policy shall have the same meaning ascribed to it in the Companies Act, 2013 or Rules made thereunder, Accounting Standards or any other relevant legislation/ law applicable to the Company from time to time.

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