

Corporate Social Responsibility Policy

1. Preamble:

This Corporate Social Responsibility Policy ("the CSR Policy") has been framed by Isprava Vesta Private Limited ("Isprava" or "Company") in accordance with the Section 135, Schedule VII of the Companies Act, 2013 ("the Act") and CSR Rules issued by the Ministry of Corporate Affairs on February 27, 2014, as amended from time to time.

Unless the context otherwise requires, the definitions mentioned in the notification dated February 27, 2014, as amended from time to time and Companies Act 2013, shall apply to this CSR Policy.

CSR at Isprava portrays a deep relationship that the Company enjoys with the communities it is engaged with. As a responsible corporate citizen, Isprava believes in regularly contributing to social and economic development.

2. CSR Activities:

The Company proposes to implement its CSR activities, as determined by the Board of Directors of the Company in certain of the various sectors stated hereunder, which fall within the purview of the Schedule VII of the Act:

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the *Swach Bharat Kosh* set-up by the Central Government for the 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 the 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, protection of flora and fauna, animal
- v. welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.

- vi. 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 art and handicrafts.
- vii. Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Paramilitary Forces (CPMF) veterans, and their dependents including widows.
- viii. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.
- ix. Contribution to the Prime Minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women.
 - (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
 - (b) Contribution to public funded universities ; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization (DRDO) Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- x. Rural development projects
- xi. Slum Area development (Explanation: For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.)
- xii. Disaster Management including relief, rehabilitation and reconstruction activities.

The Company will review the sectors from time to time and make additions, deletions or clarifications to the above sectors.

3. CSR Expenditure:

It shall be the endeavour of the Company to spend in every financial year, at least 2% of the average net profit of the three immediately preceding financial years (or such other limit as may be prescribed under the Act). Subject to the consent of the Board of Directors, the Company may allocate more fund/ amount than the amount prescribed under section 135 of the Companies Act, 2013, for the CSR activities for any financial year. The Board shall calculate and approve the total fund to be utilized for CSR activity for respective financial year. If the CSR expenditure in any financial year exceeds the statutory limit, such excess may be set-off by the Company against the CSR expenditure for the next three financial years, with the approval of the Board.

CSR expenditure shall include all expenditure including contribution to corpus for projects or programs relating to CSR activities approved by the Board.

4. Identification of activities/ projects:

The Company's CSR programmes / activities shall be implemented through i) Company personnel, or ii) external implementing agencies, or iii) such other eligible Trusts, Societies, Foundations or Section 8 companies, that may be identified by the Board from time to time. Out of approved CSR activities, the Board shall decide which activity / project should be given priority for the respective financial year. While arriving at the decision of the activity to be undertaken for the respective year, the Board shall analyse the basic need of the community/ area in which the organisation operates or at the place where its registered office is situated.

5. Implementation process:

After prioritizing the activity, the Board shall finalise the detail implementation project/ programme, including planning for expenses against the total budget allocated for CSR activities.

6. Organisational Responsibility:

At organisational level for implementation of agreed CSR activity, the Board may constitute an implementation team or authorise any of the Department of the Company to organize for the implementation of the CSR activity. The team or respective department shall assist the Board in the implementation process from time to time. The respective department or implementation team would be responsible for reporting of any irregularity to the Board on immediate basis. Unless otherwise required under the provisions of the Companies Act, 2013, the CSR activities shall be monitored by the Board directly instead of a CSR committee.

7. Monitoring Mechanism:

i) The Board shall be apprised on the implementation of the CSR activities and the progress shall be monitored once a year basis.

ii) Records relating to the CSR activities and the CSR expenditure shall be accurately maintained.

8. Management Commitment:

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

Our Corporate Social Responsibility policy conforms to the relevant section of the Corporate Social Responsibility, Rules made under Companies Act, 2013 and amendment(s) made thereto.

9. Website Display:

The Company shall display on its website the contents of its CSR Policy and other information as may be required to be displayed as per the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014.

10. Amendment to the Policy:

The Company is committed to continuously reviewing and updating its policies and procedures. Therefore, this policy is subject to modification. This Policy and every subsequent modification, alteration or amendment made thereto, shall be promptly disclosed on the Company's website and in applicable regulatory filings pursuant to applicable laws and regulations. However, in case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.