

Corporate Social Responsibility Policy

1. Purpose

Atlanta Electricals Limited (Company) believes that business should be carried out in a professional manner along with the contribution towards sustainable development of the society, creating a positive influence in the communities and societies where we operate and to make planet a better place for future generations. The policy is framed to meet the objectives of our social indicatives and regularize the compliance of Companies Act, 2013.

2. Scope

CSR Policy is applicable to Atlanta Electricals Limited (Company) and its branches which are mandated with the CSR expenditure obligations as per Section 135 of the Companies Act, 2013 and Schedule VII thereto along with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

This Policy applies to all CSR projects that will be undertaken by the Company and shall fulfil all the requirements of Section 135 of the Companies Act, 2013. The company shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act, 2013. This Policy will be periodically reviewed and updated in line with the relevant codes of legislation and best practices that can be adopted by the company.

3. CSR VISION

The Company completely endorses reliability. It is committed to conduct business in a true, fair and ethical manner and takes up the responsibility to create a good impact in the society it belongs. The Company is committed towards improving the quality of lives of people in the communities in which it operates because society is an essential stakeholder and the purpose of its existence. The Company aims to fulfil the requirements laid down under the Act and act diligently to comply with all its Rules and Regulations on CSR.

Through sustainable measures, actively contribute to the social, economic and environmental development of the community in which the Company operates ensuring participation from the community and thereby create value for the nation.

4. CSR Mission

- To build sustainable value-based relationship with the key stakeholders through ongoing two-way communication.
- To undertake CSR programmes with a human face.
- To transparently share the CSR initiatives with the stakeholders.
- To ensure increased commitment at all levels in the organization to operate its business in an economically, socially and environmentally sustainable manner
- To take up CSR programs that benefit the communities in and around its operational areas and over a time result in enhancing the quality of life and economic well-being of the local populace.
- To promote inclusive growth and address the basic needs of the deprived, underprivileged and weaker sections of society.
- To generate goodwill and pride for (Company) among stakeholders and help reinforce a positive and socially responsible image of (Company) as a corporate entity.

3. Date of Commencement

The policy shall come into force from the date of issue i.e. 25th January, 2025.

4. Key Definitions:

In this Policy, unless the context otherwise requires:

1. **“Act”** shall mean the Companies Act 2013 and the rules made there under, including any modifications, amendments or re-enactment thereof.
2. **“Administrative Overheads”** means the expenses incurred by the Company for general management and administration of Corporate Social Responsibility functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or program.
3. **“Agency”** (or Agencies) means the organization that comes within the category as mentioned under rule no 4 of The Companies (CSR Policy) Amendment Rules, 2021 and the independent organization taken on board for assessment, project designing, monitoring & evaluation
4. **“Approved Budget”** shall mean the total budget as approved by the Board of the Company upon the recommendation of the CSR Committee, which is to be utilized for CSR Projects.

5. **“Board”** shall mean the Board of Directors of the Company.
6. **“Company”** shall mean Atlanta Electricals Pvt. Ltd. and wherever the context requires, shall signify the Company acting through its Board.
7. **“CSR”** means the activities undertaken by the Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in these rules, but shall not include the following, namely: -
 - i. activities undertaken in pursuance of normal course of business of the Company;
 - ii. any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
 - iii. contribution of any amount directly or indirectly to any political party under section 182 of the Act;
 - iv. activities benefitting employees of the Company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
 - v. activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services; and
 - vi. activities carried out for fulfilment of any other statutory obligations under any law in force in India.
8. **“CSR Annual Plan”** shall mean the annual plan detailing the project, time schedule, CSR expenditure for the year.
9. **“CSR Committee”** means Corporate Social Responsibility Committee of the Company constituted by the Board.
10. **“CSR Team Members”** shall mean the Corporate Social Responsibility Committee constituted by the Board of the Company in accordance with the Act, consisting of 5 members from the Company.
11. **“CSR Expenditure”** means all CSR Expenditure of the Company as approved by the Board upon recommendation of the CSR working Committee, including the following:
 - Contribution to CSR Projects which shall be implemented and/or executed by the Company.

- Any other contributions covered under Schedule VII to the Act. Contribution of any amount directly or indirectly to any political party under section 182 of the Act shall not be considered as CSR Expenditure.
12. **“CSR Policy”** means a statement containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan;
13. **“CSR Projects”** or **“Projects”** means Corporate Social Responsibility projects/activities/ programs/ initiatives instituted in India, either new or ongoing, and include but not limited to those undertaken by the Board in pursuance of recommendations of the CSR Committee as per the declared CSR Policy of the Company.
- Projects/activities/ programs/ initiatives undertaken in pursuance of normal course of business of the Company and projects which benefit only the employees of the Company, and their families shall not be considered as CSR Projects.
14. **“Financial Year”** shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.
15. **“Net profit”** shall mean the net profit as per the Act and Rules based on which the specific percentage for CSR Expenditure must be calculated.
16. **“Ongoing Project”** means a multi-year project undertaken by the Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification.
17. **“Rules”** shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re-enactment, modifications or amendments thereof.
18. **“Thrust Areas”** shall have the meaning as ascribed to them as per provisions given herewith in the Policy.

Words and expressions used and not defined in the Policy shall have the same meanings respectively assigned to them in the Act and/or Rules.

5. Thrust Areas:

The CSR activities we pursue will be in line with our stated Vision and Mission, focused not just around our plants and offices, but also in other geographies based on the needs of the communities. We intend to undertake CSR initiatives as permitted under section 135 of the Companies Act , 2013 and Schedule VII thereto along with the related rules in following areas:

- 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 centres 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 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.
- V. 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;
- VI. measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- VII. training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
- VIII. 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.

IX. (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) Contributions 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 CSR projects/ activities undertaken by the Company will be in the line with Schedule VII activities and will also include terms incorporated as per amendments to the Schedule VII through subsequent notification, circulars etc. released by appropriate authority.

- The CSR activities shall be undertaken within the territory of the Republic of India.

- The Company's CSR projects and programs will be undertaken by the Company by itself or with joint and collaborative efforts of other companies.

- The CSR projects and programs may also be implemented through registered public charitable trusts or registered society, registered under section 12A

and 80G of the Income Tax Act, 1961, companies established under Section 8 of the Companies Act, 2013 (corresponding to Section 25 of the Companies Act, 1956) and/or through any implementing entity eligible under the Act and CSR Rules.

6. Details / Process

The philosophy and process of CSR is imbibed in our business activities and social initiatives taken in the area of education, health, sanitation, hunger, poverty, drinking water, environment infrastructure development, emergencies and natural calamities etc.

6.1 Company strongly believes that it is accountable for contributing back in a meaningful way to the society. For execution of its CSR objectives and to make a positive impact with its CSR activities, Company desires to involve its employees too in an effort to create a sense of involvement and bring about social responsibility amongst them. Wherever necessary, Company will formulate CSR foundation, partner and collaborate with NGOs / other similar organizations that have experience, knowledge and a wider reach to meet its CSR objectives.

6.2 CSR Committee and Responsibilities

(A) Company has constituted Corporate Social Responsibility Committee (the “CSR Committee”) in line with Section 135 of the Companies Act, 2013 (the “Act”).

The CSR Committee consists of following members of the Board:

S. No.	Name	Position in Committee
01	Niral Krupeshbhai Patel	Chairman
02	Amish Krupeshbhai Patel	Director
03	Dukhabandhu Rath	Independent Director

(B) The CSR Committee shall inter alia be responsible for the following:

- i) Formulate and recommend the CSR Policy to the Board and suggest changes therein, from time to time;
- ii) Identify the areas of CSR activities to be taken up by the Company every year in accordance with this Policy;

- iii) Recommend the CSR Budget every year and project or activity to be undertaken;
- iv) Formulate and recommend to the Board for its approval, an annual action plan every financial year outlining the following:
 - a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - b) the manner of execution of such projects or programmes;
 - c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - d) monitoring and reporting mechanism for the projects or programmes; and
 - e) details of need and impact assessment, if any, for the projects undertaken by the Company.

- (v) Implement, oversee and monitor the progress of the project or activity rolled out under this Policy;

- (vi) Provide an update to the Board on all CSR activities undertaken during the financial year; and

- (vii) Such other functions and responsibilities, as may be assigned from time to time.

(C) The CSR Committee shall meet at-least once in a year.

6.3 CSR Team Members

Dedicated CSR team shall be constituted from among the employees at Company **(Annexure-A)**, for implementing the CSR Policy and shall work under the guidance of CSR Committee and will be mainly responsible for:

- Execution of CSR Policy.
- Identify projects and key initiatives pursuant to CSR Policy.
- Fund Manager shall facilitate the allocation of funds to the projects as identified for CSR activities.
- Monitoring CSR Projects to establish the effectiveness of CSR efforts and appraise the same to CSR Committee.
- Company Secretary shall be responsible for the Compilation of information & preparation of Annual Reports on CSR activities and presenting the same to CSR Committee.
- Any other activity necessary to ensure the achievement of CSR objectives.

- CSR Team may identify the projects through Direct / Indirect / Participatory Approach involving beneficiaries
- CSR Team may engage external professionals/firms/agencies if so required, for the purpose of implementation of its CSR Projects.
- CSR Team may engage Agencies/NGOs which are eligible to implement CSR projects as per section 135 of The Companies Act, 2013.
- The Company Secretary will arrange monthly CSR review meetings with the team members.
- CSR Project Manager shall review and implement the CSR projects in line with the CSR Policy, necessary social compliances, and approval from various govt. authorities related to society, community development and support.

6.4 Identification of CSR Projects:

- a) CSR Projects shall be identified and planned for approval of the CSR Committee, particularly in Thrust Areas, with estimated expenditure and phase-wise implementation schedules.
- b) The Company will ensure that in identifying its CSR Projects, preference shall be given to the local area and areas around which the Company operates. However, this shall not prevent / bar the Company from pursuing its CSR objects in other geographical areas.
- c) As a guiding principle, the CSR Projects in Thrust Areas shall be identified on the basis of a detailed assessment survey and feasibility study.
- d) The CSR team members in consultation with the CSR Committee, may engage external professionals/firms/agencies if required for the purpose of identification (and implementation) of CSR Projects.

6.5 Implementation of CSR Projects:

The Company shall implement the identified CSR Projects by the following means:

a) Direct Method

- a) The Company may itself implement the identified CSR Projects presently within the scope and ambit of the Thrust Areas as defined in the Policy.

- b) The CSR team members may designate /engage external professionals/firms/agencies if so required, for the purpose of implementation of its CSR Projects.
- c) The Company may collaborate with other companies if required, for fulfilling its CSR objects through the Direct Method, provided that the CSR Committees of respective companies are able to monitor separately such CSR Projects.

b) Indirect Method

- a) The Company may implement the identified CSR Projects through Agencies which are eligible to implement CSR projects as per section 135 of The Companies Act, 2013, The Companies (CSR Policy) Rules, 2014 including any modifications, amendments or re-enactment thereof.
- b) The Company may collaborate with other companies, if so required, for fulfilling its CSR objects through the Indirect Method provided that the CSR Committees of respective companies are in a position to monitor separately such Projects.

6.6 CSR Budget

The total budget for the CSR projects in each financial year will be decided by the CSR Committee in accordance with applicable provisions of the Act and the CSR Rules. The CSR Committee shall propose to distribute the budget among the Areas to Focus or such of them as the CSR Committee may deem fit in each financial year, in such proportion and in a manner that meets the objectives of the CSR Policy.

If the CSR team is not able to utilize the allocation agreed on in any of the areas to focus described above, the same shall be utilized in such other areas to focus as the CSR team may recommend with the reasons therefore, and the CSR Committee may approve.

6.7 CSR Contribution

Company will endeavor to contribute and spend at least 2% of the average net profits of Company made during the three immediately preceding financial years or such amount as may be recommended by the CSR Committee from time to time in pursuance of this Policy.

6.8 CSR Compliance

The CSR Team will plan, implement, monitor and manage all CSR projects & activities for Company and will work closely with the CSR Committees of the Boards of company and the Group companies as applicable.

The CSR Team will formulate implementation plans for the projects by clearly defining the following:

- Activities to be undertaken.
- Budgets proposed.
- Time frame for implementation.
- Responsibilities and authorities for implementation.
- Results expected to be achieved post-implementation

The Company Secretary shall ensure all the statutory compliances related to CSR.

6.9 Fund allocation and others:

I. Fund allocation

1. The Company, in every Financial Year, shall endeavor to spend such feasible amount as CSR Expenditure, which shall not be restricted by the statutory limit of a specified percentage of its average net profits of the immediately preceding three Financial Years. However, the aforementioned CSR Expenditure in any Financial Year shall be at least 2% of Company's average Net profits for the three immediately preceding Financial Years.
2. The CSR Committee in consultation with CSR Team Members shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely:-
 - a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - b) the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4 of The Companies (CSR Policy) Amendment Rules, 2021

- c) the modalities of utilization of funds and implementation schedules for the projects or programmes;
- d) monitoring and reporting mechanism for the projects or programmes; and
- e) details of need and impact assessment, if any, for the projects undertaken by the company:

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

- 3. Total expenditure in the CSR Annual Plan shall be approved by the Board upon recommendation by the CSR Committee and CSR Team Members.
- 4. In case the Company fails to spend the statutory minimum limit of 2% of Company's average net profits of the immediately preceding three years, in any given financial year, the Board shall specify the reasons for the same in its report in terms of clause (o) of sub-section (3) of section 134 of the Act. And, unless the unspent amount relates to any ongoing project referred to in sub-section (6) of section 135 of act, the company will transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. Any amount remaining unspent pursuant to any ongoing project, fulfilling such conditions as may be prescribed, undertaken by a company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the company within a period of thirty days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

II. Others

- 1. The CSR Committee in consultation with CSR Team Members shall ensure that major portion of the CSR expenditure in the Annual Plan shall be for the Projects as per CSR objectives. However, there shall not be any preference given to any particular projects for budgetary allocation and it shall be made purely as per the identified CSR Projects on need basis.

2. The Board of the Company are authorized to decide on Projects to be implemented within the allocation as per the Annual Plan.
3. The Company may build CSR capacities of their own personnel or those of the Agencies or Institutions through which CSR Activities are being conducted, but such expenditure on capacity building shall not exceed 5% of the Approved CSR Budget of the Company for the Financial Year.

6.10 CSR Monitoring

- i. Monitoring of CSR programmes will be done concurrently with implementation to assess the progress vis-à-vis planned.
- ii. To ensure transparency and effective implementation of the CSR programmes undertaken, a robust monitoring mechanism will be instituted by the Company, providing for periodic monitoring at different levels using the following indicative medium:
 - a) Monthly Progress Report
 - b) Quarterly Progress Report
 - c) Half Yearly Progress Report
 - d) Site Visits
 - e) Other in – house monitoring mechanisms, as determined by the CSR Committee.
 - f) Third Party, as and when required, can be engaged for monitoring with due care to eliminate conflict of interest
- iii. 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
- iv. person responsible for financial management shall certify to the effect.

6.11 CSR Reporting

The CSR Committee of the Board, based on reports presented by the CSR Team, will annually publish report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act 2013.

The CSR Committee shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR Policy is in compliance with the approved Corporate Social Responsibility CSR Policy of company.

The CSR Policy on being approved by the Board shall be displayed on the website of company and any modifications carried out from time to time shall also be updated on the website of Company respectively.

7. Duties and Responsibilities:

I. Board of Directors

- I. The board shall review and approve the CSR policy and CSR action plan. Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.
- II. The Board of a company shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it
- III. The Board shall include in its Report the annual report on CSR Projects as per the format provided in the Annexure to the Rules.

II. CSR Committee

1. The CSR Committee shall monitor the implementation of the CSR Policy and CSR Annual Plan. For this purpose, the CSR Committee shall meet at least one times in a year.
2. In discharge of CSR functions of the Company, the CSR Committee shall be directly responsible to the Board for any act that may be required to be done by the CSR Committee in furtherance of its statutory obligations, or as required by the Board.
3. The CSR Committee shall place before the Board the draft annual report as per the format in Annexure to the Rules, in Board meeting of the following year for Board review and finalization.

4. The CSR Committee shall place before the Board on completion of financial year, its responsibility statement affirming that the implementation and monitoring of CSR Policy is in compliance with CSR objectives and Policy of the Company, for inclusion in the Board's Report.
5. The CSR Committee shall ensure that the CSR Policy and finalized Annual Plan is displayed on the Company's website.

III. CFO/ Financial Head

1. The Chief Financial Officer or the person responsible for financial management shall review and certify to the effect that the funds have utilized for the stated purposes

8. Review Periodicity and Amendment:

1. CSR Plan may be revised/modified/amended by the CSR Committee in consultation with CSR Team Members at such intervals as it may deem fit and recommend to the board for the approval
2. The CSR Committee in consultation with CSR Team Members shall review the Policy every year unless such revision is necessitated earlier.

9. CSR Surplus Fund

Any surplus generated from CSR projects undertaken w. e. f. 'Financial Year' will be tracked and channelized into the CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits as per the Company Act and CSR Rules.

10. Impact Assessment

- (a) Every company having average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.
- (b) The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.
- (c) A Company undertaking impact assessment may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed

two percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is higher.

11. Administrative Overheads

Administrative overheads are classified as employee cost, utility, office supply, legal expenses & expenses incurred by the company for general management of CSR function. The company has defined the maximum permissible limits for administrative overheads as 5% of total CSR expenditure of the company in the given financial year”, in line with the CSR Rules.

12. Declaration

Company is committed to follow all the guild lines are mentioned and updated in accordance with any regulatory amendment or notification or otherwise, at any time without assigning any reason whatsoever. Any such amended Policy will be updated on the website of the Company.

13. Disciplinary Action / Jurisdiction

Breach of any of the above policy/ rules by an employee shall be treated as misconduct and shall make him liable for disciplinary action. The courts of Anand, Gujarat will have exclusive jurisdiction over all disputes related to this Contract.

All parties expressly consent to this Jurisdiction and waive, as well as undertake that they will not assert any claim, with respect to personal applicability, inconvenience of forum, venue or any other hardship related to jurisdiction.

14. Amendments to the Policy:

The Board shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy.