

BHATIA COMMUNICATIONS & RETAIL (INDIA) LIMITED

CIN No: L32109GJ2008PLC053336

Corporate Social Responsibility Policy

Regd. office:132, Dr. Ambedkar Shopping Centre, Ring Road, Surat-395002, Gujarat

E-Mail:csbhatia@bhatiamobile.com, **Web:**www.bhatiamobile.com, **Phone:**0261-2349892

PHILOSOPHY

Bhatia Communications & Retail (India) Limited (**“BCRIL” or “the Company”**) has been an early adopter of Corporate Social Responsibility (**‘CSR’**) initiatives. Along with sustained economic performance, environmental and social stewardship is also a key factor for holistic Business growth. Bhatia believes in developing business with eco-friendly and sustainable manner which includes development of all society & community. The company’s focus has always been to contribute to the sustainable development of the society and environment and to make our planet a better place for future generations.

Our CSR Vision

Bhatia believes in creating synergies with our partners in growth and success. We are committed to augment the overall economy and social development of the local communities by discharging our responsibilities in a sustainable manner.

The Policy will assist and promote our suppliers and vendors in adhering to its imperatives.

Our CSR Mission

Be committed to sustainable actions and contribute meaning fully to the Triple Bottom Line (social, economic and environment) performance.

Our Values:

Bhatia believes in integrity, respect and recognition, passion for excellence, working together with all the people.

Our Activities

The CSR activities we pursue will be in line with our stated Vision and Mission, focused not just around our offices, but also in other geographies based on the needs of the communities.

In accordance with the primary CSR philosophy and the specified activities under the Act read with Companies (Corporate Social Responsibility Policy) Rules, 2014 (the “CSR Rules”), and any amendment(s) thereof, the CSR activities of Bhatia Communications will have the following thrust areas:

1. Eradicating hunger, poverty and malnutrition:

- Provision of food, nutrition supplement, clothes etc for the poor, children and other deprived sections of the society.
- Promoting sanitation, making available safe drinking water.

2. Promoting Healthcare including Preventive Healthcare

- through awareness programmes, health check-ups, provision of medicine & treatment facilities, providing pre natal & post natal healthcare facilities, prevention of female foeticide through awareness creation, program for preventing diseases and building immunity.

3. Ensuring environmental sustainability and ecological balance through:

- Plantation drives in schools, villages, our offices/business premises and other areas in general;
- Reviving endangered plants, promoting agro-forestry;
- Protection of flora & fauna;
- Conservation of natural resources
- Maintaining quality of soil, air & water.
- Adoption of waste lands to cultivate plants;
- Promoting biodiversity;
- Technical support and Knowhow for improving farming and building capacities of small farmers.
- Promoting alternate energy resources.

4. Promoting education

Promoting education, including special education and employment enhancing vocational skills, specially among children, women, elderly, and the differently abled and livelihood enhancement projects.

5. Other Activity

- Reducing inequalities faced by the socially and economically backward groups
- Welfare of armed forces personnel
- Employing people and incurring other costs to carry out aforesaid activities, expenditure shall not exceed five percent of total CSR expenditure.

6. Such other activities as the Board may consider being appropriate.

Implementation/Monitoring of CSR Activities

Bhatia will undertake its CSR activities approved by the CSR Committee. The CSR activities will be driven by a dedicated project team under the guidance and support of the CSR Committee and the Board. The CSR Committee will play a significant role in ensuring that the CSR policy is embedded across Bhatia's operations and the CSR initiatives are in line with this policy.

The CSR Committee will be responsible for monitoring approved projects and fund disbursements for such projects. The CSR Committee will put in place a transparent monitoring and reporting mechanism for ensuring effective implementation of the projects, programs and activities proposed to be undertaken by Bhatia. Such monitoring mechanisms will include visits, meetings and progress/status reporting by the project teams.

Any or all provisions of this CSR policy may be amended by the Board based on the recommendations of the CSR Committee or in accordance with any statutory guidelines that may be issued from time to time.

Composition of CSR Committee

The CSR Committee shall consist of the following Directors:

1. Mr. Sanjeev Harbanslal Bhatia - Chairman
2. Mr. Nikhil Harbanslal Bhatia - Member
3. Mr. Rachit Naresh Narang - Member

Meeting of CSR Committee:

The meeting of the CSR Committee shall be held at such time and place as and when required.

Responsibilities of the committee

The Responsibilities of the CSR Committee include:

- formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII;
- recommend the amount of expenditure to be incurred on the activities; and
- monitor the CSR Policy of the company from time to time.

CSR Funds

The corpus for the purpose of carrying on the aforesaid activities would include the following:

- 2% of the average Net Profit made by the Company during immediately preceding three Financial Years.
- Any income arising therefrom.

- Surplus arising out of CSR activities carried out by the company and such surplus will not be part of business profit of the company.
- Where a company spends an amount in excess of requirement provided under section 135(5), such excess amount may be set off against the requirement to spend under section 135(5) up to immediate succeeding 3 financial years subject to the conditions that –
 - (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of this rule.
 - (ii) the Board of the company shall pass a resolution to that effect.

Transfer of unspent CSR amount

Until a fund is specified in Schedule VII for the purposes of sub-section (5) and (6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act.

Annual Action Plan

The CSR Committee 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 rule 4(1);
- (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:

Further, 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.

Governance

The CSR department will provide regular progress report to the CSR Committee of the Board. This report would indicate:

1. Achievement since last progress report / during the last quarter in terms of coverage compared to the target and reasons for variance.
2. Achievement of the year-to-date in terms of coverage compared to the target, plans to overcome shortfalls if any and support required from the CSR Committee/Board to overcome the shortfalls.
3. Actual year-to-dates pends compared to the budget and reasons for variance.

4. In respect of activities undertaken through outside Trust/Society/NGO's etc. there will be mechanism of monthly reporting of progress on each such activities and the amount incurred thereon.

(This policy is revised by the Board of Directors at their meeting held on 27th March, 2025 and effective from 27th March, 2025)