

ALLCARGO SUPPLY CHAIN PRIVATE LIMITED

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CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY
(Adopted on August 04, 2023)

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. Introduction and Objectives:

Allcargo Supply Chain has committed itself to making a difference in the lives of underprivileged and economically challenged citizens of our country. Allcargo's Corporate Social Responsibility (CSR) initiatives, through 'Avashya Foundation' a non-Profit organization and in collaboration with various NGOs, Trusts, other approved entities or institutions engaged in CSR programs, believes in nurturing inclusive development with a human touch. The Company's CSR activities focus is to take each initiative beyond philanthropy and promote people centric inclusive development with the active participation of the community at all levels. Allcargo's CSR initiatives aim to support:

CSR has been core to the business philosophy at Allcargo Supply Chain Private Limited, achieving sustainable development-economically, socially and environmentally is its goal as it strives to give back to the community that the Company operates in.

The objectives of the CSR policy are:

- To promote inclusive sustainable development for the marginalized section of the society;
- To undertake programs that benefits underprivileged and needy communities socially, economically and environmentally in enhancing quality of their life; and
- To generate community goodwill for Allcargo and create positive and socially responsible image of the Allcargo as a corporate entity.
- To undertake various programs in accordance with Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 and Schedule VII of the Companies Act 2013, for the benefit of the community at large.

All words and expressions used and not defined in this policy shall have the same meaning as defined in the Companies Act 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.

2. Corporate Social Responsibility

Allcargo Supply Chain is committed to making a positive contribution to the social fabric around us. Our Corporate Social Responsibility (CSR) initiatives extend beyond plain philanthropy and contribute towards greater sustainability.

3. Amendment in CSR Policy:

The Ministry of Corporate Affairs (**'Ministry'**) has issued various amendments, circulars, notifications, etc., subsequent to the introduction of The Companies Act, 2013 & Schedule-VII and the Companies (Corporate Social Responsibility Policy) Rules, 2014. Ministry has issued amended CSR Rules titled as Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (**'New CSR Rules'**) vide Gazette notification no. G.S.R. 40€ dated January 22, 2021.

The policy of the Company is in line with the aforesaid amendments.

1. CSR Intervention

CSR strategy is focused on six broad areas of activity that address the social problems and needs of multiple target groups of the society in a holistic and sustainable manner.

Education for children and adults across the underprivileged and economically challenged sections of the rural as well as urban society. Creation of the platform for financial assistance, student's scholarships & adoption programs, parent's awareness campaigns and education support infrastructure paving way for the mainstreamization of education, improving quality of education and infrastructure.

Health Care by providing critical medical assistance for curative and preventive health care with the objective of addressing challenges of affordability and accessibility in public health. Essential and lifesaving medicines and medical treatment are being made available to all underprivileged and economically challenged section of the society in Mumbai.

Women Empowerment by providing a platform for all women across the varied sections of the society for making a better living through education, skills development and employment program, to support themselves and their families thereby improving social and economic conditions.

Natural Disaster Relief by providing immediate and life essential supply of water, food and medicine to regions of India effected by natural disasters such as drought, flood, earthquakes, and other calamities.

Environmental Sustainability by focusing on creating awareness towards sustainable environmental practices, environment conservation, water conservation, alternative energy, conservation of natural resources and training people to be more conscious, responsible and accountable to the environment and its conservation.

Sports by promoting and supporting human personality and excellence in sports associated with high prestige and morale. By sponsoring sportsperson to enable them to participate in state, national and international level sports, promotion of different sports activities, undertaking programs for creation of pool of competitive sportsperson.

Besides activities listed hereinabove, the Company is also committed to undertake activities listed in Schedule VII of the Companies Act, 2013 as amended from time to time.

2. CSR Project Management

2.1 CSR Committee

CSR Committee shall formulate and recommend to the Board, a Corporate Social Responsibility Policy along with activities to be undertaken, recommend the amount of expenditure, monitor the functioning of the CSR projects/activities/programs and Avvashya Foundation and shall also review various projects and activities undertaken by

the Company and / or collaborating partners in compliance with and under this Policy and shall update the Board of Directors for making adequate disclosures in the Board's report.

In case CSR Commitment of the Company does not exceed Rupees Fifty Lakhs then formulation of CSR Committee is not applicable and functions of the Committee can be discharged by the Board of Directors.

Following are the responsibilities of the CSR Committee:

- a. Formulate and recommend the CSR Policy for approval of the Board.
- b. Monitor the Policy, from time to time, and recommend changes, if any, for Board's approval.
- c. Recommend CSR projects, which are in line with the projects, programs or activities specified in Schedule VII of Section 135 of the Companies Act, 2013, to be undertaken for approval of the Board.
- d. Recommend the amount of expenditure to be incurred on CSR projects for approval of the Board.
- e. Formulation and recommendation to the Board an Annual Action plan as per the provisions of the Act
- f. Recommendation of any alteration in the Annual Action Plan at any time during the year and update, if any, required to the CSR policy
- g. Identify projects of the Company as "Ongoing Projects" as per the provisions of the Act and recommend the same to the Board
- h. Appoint a third party to undertake Impact assessment through for eligible CSR projects
- i. Ensure receipt of certificate from CFO regarding utilization of funds disbursed for the purpose and in manner approved by the Board
- j. Implementation and Monitoring of the CSR activities as per the annual action plan;
- k. Recommend the annual CSR expenditure budget to the Board for approval;
- l. Carry out any other function contained in the Listing agreement / Listing Regulations, as amended from time to time or under any statutory obligation or delegated by the Board from time to time

2.2 Board of Directors:

The ultimate responsibility relating to compliance with the statutory requirements prescribed under the Companies Act, 2013 and Rules framed thereunder and as amended from time to time relating to undertaking CSR activities shall lie with the Board of Directors of the Company.

3. Financial Resources:

Funding and Allocation

For achieving its CSR vision through implementation of meaningful and sustainable CSR programs, Allcargo will allocate at least 2% of average net profit of previous three year's or such % prescribed by the Government from time to time, as its annual CSR budget.

Any surplus arising out of CSR projects/activities/programs shall not form part of the business profit of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within stipulated time period as per the Companies Act.

Board should ensure that administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.

All amount spent by the Company for creation or acquisition of a capital asset which shall be held by Company registered under Section 8 of the Companies Act, 2013, Registered Public Trust or Registered Society having charitable objects and CSR Registration Number or beneficiaries of the said CSR project in the forms of self- help groups, collective entities or public authority.

Any amount spent in excess of Budgeted amount will be available for set-off for immediate three succeeding financial years as per Section 135 of the Companies Act, 2013, subject to the following conditions:

- Excess amount available for set – off shall not include the surplus arising out of CSR Activities, if any.
- Approval of Board of Directors.

Explanation: For the purposes of this policy “average net profit” shall be pre-tax profits as calculated in accordance with the provisions of Section 198 of the Companies Act, 2013 as amended from time to time.

Budget Approval: At the beginning of the year, the Company shall prepare the CSR budget for each CSR activities which it intend to undertake in compliance with this policy during the year and present the same to the CSR Committee for its consideration. The CSR Committee shall review the budget and identified CSR activities and recommend the same to the Board for its consideration and approval. The Directors of Allcargo Supply Chain is authorized by the Board of Directors to sanction the CSR expenses out of approved CSR budget from time to time. Any non-budgeted CSR request shall be presented to the CMD after review of the project in accordance with the CSR policy.

4. Prohibited Activities/ Restrictions under CSR

The company shall refrain from carrying out activities specified below:

- Activities disturbing communal and social harmony in the country in any manner
- Religious activities like construction of temple, mosque, church, vihara etc.
- The CSR projects/activities/programs undertaken by the Company, as per this policy shall exclude activities undertaken in pursuance of its normal business.
- The CSR projects/activities/programs shall be undertaken in India only except for training of Indian sports personnel outside India who is representing any State or Union Territory at national level or India at international level.

- The CSR projects/activities/programs that benefit only the employees of the Company and their families, shall not be considered and not qualify as CSR expenditure.
- Contribution of any amount directly or indirectly to any political party under Section 182, shall not be considered and not qualify as CSR expenditure.
- Activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services shall not form part of CSR expenditure.
- Activities carried out for fulfilment of any other statutory obligations under any law in force in India shall not form part of CSR expenditure.

5. General:

- Any or all provisions of the CSR policy would be subjected to revision/ amendment as per the guidelines as may be issued from the Government time to time and/ or as recommended by the CSR Committee and approved by the Board of Directors of the Company from time to time.
- The company reserves the right to modify, cancel, add or amend rules/ provisions specified in the CSR policy.

6. Dissemination of CSR activities on its website:

The Company shall mandatorily disclose the composition of Committee, content of this Policy and projects/activities/programs approved by Board of Directors on their website for public access (if and when applicable).