



CORPORATE SOCIAL RESPONSIBILITY POLICY

Corporate Identification Number [CIN]: L45200GJ1991PLC015817
Ganesh Corporate House, 100 Feet Hebatpur Thatltej Road, Near Sola Bridge,
Off S. G. Highway, Ahmedabad 380 054

PREAMBLE:

India is a country of myriad contradictions. On one hand, it has grown to be one of the largest economies in the world, and an increasingly important player in the emerging global order; on the other hand, it is still home to the largest number of people living in the absolute poverty. It may be believed that the root cause of this social unrest is an uneven distribution of the benefits of growth. Governments as well as regulators have responded to this unrest and have foster the need to undertake Corporate Social Responsibility by corporate sector by mandating the CSR activities within the purview of Companies Act, 2013.

For, Ganesh Housing Corporation Limited (hereinafter referred to as “the Company”), CSR is not new concept. It is rightly said that “*Action springs not from thought, but from a readiness for responsibility*”. Hence, even much before CSR global concern, the Company, being one of the leading real estate and construction Company was aware and engaged in undertaking CSR activities and fulfilling its social responsibilities. We believe that Social obligation is much bigger than supporting worthy causes. It includes anything that impacts people and the quality of their lives.

In order to serve the community, the Company has taken an active role through donations, charity and other philanthropic activities since past few years. It aims at achieving dual goals of the Company viz. maximizing the company’s overall impact on the society and stakeholder and adding to the goodwill and reputation of the Company.

The tag line of the Company is “*Your Smiles are our Real Estate*”. The Company addresses it not only to the customers and stakeholder but also to the Society at large.

OBJECTIVE:

The main objective of CSR policy encompasses the ideas of corporate governance, sustainable wealth creation, corporate philanthropy and advocacy for the goals of the community. Longevity and success for a company comes from living in harmony with the context, which is the community and society. Society contributes customers, employees and investors for a corporation. It contributes politicians and bureaucrats who frame policies that influence the success or failure of a corporation. Therefore, society is an important stakeholder for corporations. Corporations must remember that businesses cannot succeed in societies that fail.

AREAS TO BE COVERED:

The Company shall give preference to local area and areas around the Company where it operates.

SCOPE OF ACTIVITIES:

1. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water which may include following:
 - Distribution of fruits, food pack, etc. amongst the poor and needy people
 - Distribution of useful cloths to the poor people
 - Health awareness campaign on serious/chronic diseases
 - Organizing periodic health camps
 - Offering specialized support services to the physically handicapped and mentally challenged people
 - Provide safe drinking water by sinking bore wells, tube wells, establishment of water treatment plants, etc
 - Promotion of sanitation through proper drainage system and construction of toilets
 - Assistance for establishment of hospitals/medical colleges etc.
 - Installation/repair of hand pumps
 - Digging/renovation of wells
 - Gainful utilization of waste water from underground for cultivation or any other purpose
 - Development/construction of water tank/ponds
 - Rain water harvesting
 - Formation of a task force of volunteers to educate people regarding proper drinking water
 - Empowerment to the villagers for maintenance of the above facilities for availability of water

2. Promoting any kind of education including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects which may include following:
 - Support special education especially organ donations relating increasing awareness about organ donation and broadening mindsets of people and any such other special education

- Construction/repair of school building & facilities including boundary walls, separate toilets for boys & girls, parking and provision of drinking water
 - Provision of uniform, books, stationery, computer, laboratory equipments, etc. to schools
 - Promoter computer literacy and technology assisted learning
 - To promote technical/professional /medical education by giving financial assistance/opening institutions through organizations/infrastructural support
 - Support to technical/vocational institutions for their self-development
 - Academic education by way of financial assistance to Primary, Middle and Higher Secondary Schools
 - Adult literacy especially amongst those belonging to Below Poverty Line
 - Awareness programmes on girl education
 - Counseling of parents
 - Special attention on education, training and rehabilitation of mentally & physically challenged children/persons
 - Spreading legal awareness amongst people and disadvantageous sections of the society about their rights & remedies available
 - Promotion of professional education by setting up educational institutions offering courses in Engineering, Nursing, Management, Medicine and in Technical subjects, etc.
 - Provide fees for a period of one year or more to the poor and meritorious, preferably girl students of the school in the operational area of the Company to enable them to get uninterrupted education
 - Providing scholarship to students of school or colleges on need to need basis.
 - Providing such education to the children of laborers who worked at the project site.
3. 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 which may include following:
- Savings provided the entry point for poor women to come together through a Self-Help mechanism.
 - Economic and Social Empowerment of Women activities including but not limited to develop skills through appropriate training; education and vocational training, health & nutrition; encourage capacity building to enhance income opportunities; to improve reproductive health through awareness-building;
 - Gender Rights, Gender Based Violence and Law Enforcement
 - Gender Budgeting, Gender Mainstreaming & Gender Audit

- Empowerment of Vulnerable and Marginalized Groups and Women in Difficult Circumstances and to provide financial or other support to women of particular section of society;
4. ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintain quality of soil, air and water which may include following:
 - Plantation and maintenance of saplings producing fruits or flowers
 - organizing sensitizing programmes on environment management and pollution control
 - Spreading awareness on noise pollution, air pollution, green evolution and other environmental concerns
 - Afforestation, social forestry, check dams, park
 - development of jobs related to agro product i.e. dairy/poultry/farming and others
 - Animal Care
 5. training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports which may include following:
 - promotion of sports and cultural activities for participation in state and national level;
 - Promotion/development of sports activities by conducting tournaments like cricket, football, kabaddi and khokho etc.;
 - providing sports materials to the schools and institution which could not afford the same;
 - providing sponsorship for encouraging sports.
 6. protection of national heritage, art and culture including restoration of building and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts including sponsorship or other assistance
 7. measure for the benefit of armed forces veterans, war widows and their dependents;
 8. contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and funds for the welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;

9. contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
10. Rural development projects.

The above list is illustrative and not exhaustive. The Corporate Social Responsibility Committee shall be authorized to consider CSR activities not falling in this list above or any activities which is required for furtherance or supporting of any of the above including providing of infrastructure facilities, etc. The activities will be specific depending on the need assessed for the people. All activities under CSR activities should be environment friendly and socially acceptable to the local people and society.

BUGDET:

1. Each year budget for CSR activities shall be as decided by the Board on the recommendation of CSR Committee.
2. The actual budget shall be such that the Company spends at least 2% of the average net profits of the Company made during the three immediately preceding financial years.
3. The actual budget shall be based on CSR programmes planned and approved for that year. However, the Company may contribute the amount in the long term projects or planned, if any, and spend the amount over a period of time provided the Company has set aside the said amount in a separate bank account.
4. The total budgeted amount for the year shall be distributed on projects as a percentile or fixed amount as may be decided by the Board.

ORGANIZATIONAL MECHANISM

The Company may adopt all or any of the below mechanism in order to undertake and execute Corporate Social Responsibility (CSR):

1. Company may authorize CSR Committee for identified projects to be in-charge of implementation of the projects. Moreover, if required, a separate department of CSR within the Company headed by a senior person with suitable background and reporting directly to CSR Committee shall deal with activities related to CSR under overall supervision of the Committee. The Committee may also hire consultants with required competency and experience from time to time in order to implement certain projects and assisting the CSR Committee.
2. A suitable trust /registered society may also be established by the Company to implement specific project/activity. In the managing body of such trust/society at least 50% representation shall be made from Ganesh Housing Corporation Limited.

3. The Company may take up the projects directly or through any of the reputed NGOs (registered trust/registered co-operative society/Companies registered under Section 8 of Companies Act, 2013) or any other agency/respective district authorities as may be decided with the approval of Committee.

GUIDELINES FOR CONSIDERATION OF PROPOSALS AND ALLOTMENT OF FUNDS FOR CSR PROJECTS & ACTIVITIES

1. Individual proposals have to be within the framework of the CSR Policy.
2. Every CSR proposal has to be projectized. This involves defining activities, time frame, financial requirement, organizational responsibilities, outcome / expected results and sustainable aspects. The CSR department will evaluate the proposals and give its recommendations.
3. Appropriate financial powers shall be delegated to the CSR Committee for sanctioning the project and timely execution.
4. The releasing of funds in phased manner shall be clearly defined in the proposal to ensure proper utilization and submission of periodical progress reports.
5. Project proposals can be prepared by the Company on its own or through a consultant as may be necessary. The CSR Projects prepared by State/District Authorities or Local Bodies or reputed NGOs within the purview of CSR Policy may also be considered for implementation with the approval of Committee. However, such projects submitted by NGOs shall be approved only after verification of their credentials, capability and preparedness to work in the specified locations.

IMPLEMENTATION STRATEGY FOR CSR PROJECTS/ACTIVITIES

The CSR projects/activities shall be implemented in three ways as below:-

1. Directly by the Company
2. Through NGOs/Voluntary Organizations/Trusts
3. Through concerned State/District Authorities

The methodology of implementation shall be as follows:

1. Directly by the Company:

- a. The activities which can be implemented by the Company directly or by engaging contractors for infrastructural development shall be taken up the Company through CSR committee;
- b. The periodical activities such as conducting medical camps, distribution of uniforms to schools, distribution of books or stationery items to the schools or other needy children, distribution of fruits, food pack, etc. to the poor section of society, distribution of water and undertaking plantation activities for conservation of environment and other similar activities shall be taken up by the Company;
- c. The activities which cannot be taken up by the Company because of its nature, size and other limitations, shall be considered for implementation through other alternatives;
- d. For purchasing of materials connected with CSR activity, CSR Committee may authorize HR Department or any competent officer of the Company for sanctioning the purchase and carry out purchase procedure depending upon the requirement and value of purchase.

2. Through NGOs/Voluntary Organizations/Trusts

- a. The proposals of the CSR projects of long duration focusing on overall sustainable development in a given time frame requiring a dedicated team and full time attention shall be considered for implementation through reputed NGOs/Voluntary Organizations/Trusts functioning in similar activities;
- b. The NGOs/VOs shall be identified based on their credentials and long standing performance in respective fields. NGOs/VOs with proven performance and tax exemption benefit shall be given preference;
- c. In case of trust established by the Company with its management team may implement project as covered under the said policy as per their own strategy.
- d. NGOs may also come forward on their own with specific proposals in the field of their expertise, within the purview of CSR Policy. Such proposals should be complete in all respects and supported by their credentials and capabilities.

- e. Every claim/installment of NGOs for the work completed should be supported by proper bills and receipts / documents in support of the claim.

3. Through concerned State/District Authorities

- a. The CSR works which cannot be taken up by the Company directly or through NGOs /Voluntary Organizations/Trusts/ Contractors due to various reasons/constraints, shall be carried out with the help of respective State /District Authorities;
- b. The State/District Authorities may also submit specific CSR proposals. In such cases, the Company may release funds to the respective authorities for initiation and implementation, provided the schemes match with that of the Company's Policy on CSR.
- c. Such CSR works implemented through the local bodies/ agencies nominated by the District Authorities/District or State Authorities the funds shall be released in suitable installments based on the progress and Utilization Certificate

MONITORING STRATEGY FOR CSR PROJECTS/ACTIVITIES

All CSR Projects/Activities shall be monitored directly or indirectly by NMDC. The monitoring strategy shall be as below:-

1. Projects directly taken up by the Company –

- a. The CSR Projects taken up by the Company or through Contractors shall be monitored directly by CSR Committee.
- b. The award of contract for CSR works shall be finalized within the time frame set by the Committee for timely initiation of the activity. Release of funds to contractors shall be defined in the work order itself.
- c. The on-going activities such as medical camps, distribution of uniforms to schools, distribution of books or stationery items to the schools or other needy children, distribution of fruits, food pack, etc. to the poor section of society, distribution of water and undertaking plantation activities for conservation of environment, etc., shall be coordinated through Committee. All the required staff shall be provided by the respective Committee for the period of the activity.
- d. The Committee shall draw a time frame from the date of initiation. Any delay noticed while monitoring the activity, remedial measures may be taken for timely completion of the Project.

2. Through NGOs /Voluntary Organizations -

- a. The long term CSR Projects taken up through NGOs/Trusts shall be evaluated and monitored either jointly or independently by CSR Committee and respective organizations. An evaluation format shall be prepared by the Organization for this purpose and be informed to the Committee if it is made independently by the Organization.
- b. The periodicity of evaluation shall also be decided by both the parties together. At times, any official authorized by CSR Committee or any other department of the Project / HO may also independently review the performance by visiting the sites.
- c. The Committee may evaluate projects or activities taken up under a particular financial year on the basis of documents available from the NGOs/Trust.
- d. The Committee may also rely upon the certificate provided from the NGOs/Trust that the projects/activities have been undertaken and funds provided by the Company has been utilized in the manner provided under the proposal
- e. Release of funds after commencement of the activity shall be invariably linked to the joint evaluation and achievement of results against the targets till date.
- f. Release of funds shall be made after fulfilling the targets, proportionate to the funds released earlier. The self sustainability of the activity shall be established after its implementation in the given time frame.

3. Through State/District Authorities at the respective Projects-

- a. The Projects taken up through State/District Authorities shall be monitored by both Committee and the respective departments either jointly or independently.
- d. Finance shall be provided by the Company in suitable installments. After release of the first installment for initiation of the work, further release of fund shall be based on progress of the work /utilization certificate submitted by the respective Agency.

GENERAL

- a. All administrative expenses including expenditure on wages & salaries, tours and travels, training & development of personnel deputed on CSR activities would be borne from CSR funds.
- b. The Competent Authority to take decision on sanctioning works /allocation of funds for CSR and appointing authorized agencies for implementing Projects / Activities shall be as specified in the delegation of powers approved by the CSR Committee / Board of Directors.
- c. If it is observed that any CSR activity taken up for implementation is found not properly implemented, the Company at its discretion may discontinue funding the project at any time during the course of implementation.
- d. On advice of CSR Committee, selected Project may be taken up for evaluation through an outside Agency.
- e. The CSR Committee shall be empowered to recommend any amendment or modification to this policy and such recommendation shall be placed before the Board for approval.
