

Gazebo Industries Limited
Regd. Office: GAZEBO HOUSE 52GULMOHAR ROAD VILE PARLE WEST
MUMBAI MH 400018
CIN: U29130MH1988PLC046214
Email id: mps@gazeboindia.com Contact No.: 022-61217800

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. INTRODUCTION

CORPORATE SOCIAL RESPONSIBILITY at our company goes beyond business and extends to the implementation towards the socially relevant activities for the benefit of society at large.

As a part of its initiative under the corporate social responsibility, the company indulges to undertake projects in the specific area of

2. OBJECTIVES

CSR policy intends to:

The main objective of the CSR Policy is to lay down guidelines for **Gazebo Industries Limited** (*hereinafter referred to as 'the Company'*) to make CSR as one of the key focus areas to develop and Education support to the needy students, Medical Treatment to needy persons and adhere global interest in environment and society that focuses on making a positive contribution to society through effective impact and sustainable development programs.

This Policy covers the proposed CSR activities by way of making donations to the recognized Trust/Society/ agencies who are engaged in CSR activities in compliance of applicable provisions under the Companies Act, 2013. And to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future

3. FOCUS AREAS AND MODES OF IMPLEMENTATION

Focus areas

In accordance with the requirements under the Companies Act, 2013 and the rules / regulations framed there under and circulars / clarifications issued thereunder (collectively, “**Applicable Law**”), GIL CSR activities, amongst others, will focus on:

- **HUNGER, POVERTY, MALNUTRITION AND HEALTH:** Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.
- **EDUCATION:** Promoting education, including special education and employment-enhancing vocational skills, especially among children, women, the elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies, this also includes skilling and re-skilling initiatives for those who are in need.
- **RURAL DEVELOPMENT PROJECTS:** Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.
- **GENDER EQUALITY AND EMPOWERMENT OF WOMEN:** Promoting gender equality and empowering women; setting up homes, hostels and day care centers for women and orphans; setting up old age homes and other similar facilities for senior citizens; and adopting measures for reducing inequalities faced by socially and economically backward groups.
- **ENVIRONMENTAL SUSTAINABILITY:** Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water.
- **NATIONAL HERITAGE, ART AND CULTURE:** Protecting national heritage, art and culture, including the restoration of buildings, sites of historical importance, and works of art; setting up public libraries; reviving, promoting and developing traditional arts and handicrafts.

Modes of implementation

S.NO	FOCUS AREA	Implementation Strategy
01	Hunger, poverty, malnutrition and healthcare	Work directly or with non-profit organizations at infrastructure and/or operational level to support meal or nutrition related programs in schools and other institutions across India. Work with medical and health related organizations for projects in preventive healthcare, short term and long-term care and treatments.
02	Education	Partner directly or with non-profit organizations, primary, secondary and higher educational institutions including schools, colleges, and universities to encourage efforts in a wide range of areas including training, provision of funding for continued education , skilling and re-skilling initiatives, offline and online education, research, infrastructure development and capacity building.
03	Rural Development	Work with non-governmental organizations (NGOs) and local administrations to achieve community development goals. Partner directly or with governments and NGOs to support projects related to development and improvement of infrastructure and essential amenities, livelihood and skilling initiatives, training and education, and rehabilitating disaster- affected victims in rural areas.
04	Gender equality and empowerment of women	Work directly or with NGOs to reach out to underprivileged and socially disadvantaged persons including women and children towards the cause of gender equality and empowerment. Projects include awareness activities, trainings, support for livelihood related efforts, infrastructure development, and operational needs.
05	Environmental sustainability	a) Work with NGOs on safeguarding the environment, including protection of flora and fauna, promoting climate action, renewable energy, natural resource conservation as well as promoting resource efficiencies across energy, water and waste management. b) Projects can include interventions in the areas of water and wastewater management (watershed management, lake rejuvenation, etc.), rural electrification, waste to energy (household biogas), avoidance or replacement of firewood for cooking with efficient alternatives, forestry, amongst others.
06	National heritage, art and culture	Support artists, including writers, poets, painters, musicians, dancers and theatre artists, in collaboration with partner organizations through contribution towards

			operational needs, performance activities, livelihoods, and other opportunities to encourage preservation of cultural and traditional Indian art forms. Undertake restoration of architectural structures, historical monuments, and water bodies
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At initial Stage the company has planned to achieve its goal of CSR by way of making donations to the eligible CSR Society/Trust and other CSR implementing agencies along-with carry on CSR Projects at Individual level.

The Company has framed the Corporate Social Responsibility (CSR) Policy in terms of the provisions of Section 135(1) of the Companies Act, 2013.

The CSR activities of the Company may also include any projects/activities as mentioned in Schedule VII of the Companies Act, 2013.

4. APPICABILITY

The applicability of the CSR policy is in accordance with section 135 of the Companies Act, 2013 read with the CSR rules as notified by the ministry of corporate affairs. This policy shall apply to all the CSR projects undertaken by the company in India as per Schedule VII of the companies act, 2013.

This policy is applicable to **Gazebo Industries Limited**

5. COMPOSITION OF CSR COMMITTEE

The CSR committee constituted comprising of the following:

Sl. No.	Name of Director/Member	Designation / Nature of Directorship	DIN
01	Mr. Mohinderpal Singh Bharara	Managing Director	00018871
02	Mr. Harjit Singh Madan Singh Bharara	Whole Time Director	00135248
03	Mr. Gurman Singh Bharara	Whole Time Director	02459366
04	Mr. Gurson Singh Bharara	Whole Time Director	02890057
05	Ms. Aditi Gurmansingh Bharara	Committee Member	

6. Functions and Powers of Committee

To effectively implement the objectives of the Company with respect to CSR, the Committee is vested with the following functions and powers:

- a. Formulate CSR Policy and recommend the same to the Board of Directors of the Company for approval
- b. Recommend CSR activities as stated under Schedule VII of the Act
- c. Approve to undertake CSR activities, if necessary, in collaboration with group companies/other Companies/firms/NGOs etc., and to separately report the same in line with the CSR Rules
- d. Recommend the CSR Budget
- e. Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules
- f. Create transparent monitoring mechanism for implementation of CSR initiatives in India
- g. Submit the Reports to the Board in respect of the CSR activities undertaken by the Company Monitor CSR Policy from time to time
- i. Monitor activities/charter of Internal Working and Monitoring Group (WG) who are authorized to ensure that the CSR activities of the Company are implemented effectively
- j. Authorize executives of the Company to attend the CSR Committee Meetings, if necessary.

Meetings of the CSR Committee

For smooth functioning of the Committee, the members shall meet as below to discuss such matters and to take such decisions as may be necessary;

- a. The CSR Committee shall hold a minimum number of two meetings in a year.
- b. The members of the Committee may mutually agree between them regarding time and place for the said meetings.
- b. The quorum for the CSR Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.
- c. The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio visual means as may be convenient.

7. CSR Spend

The Budget of the CSR activities shall be prepared in accordance with section 135 of the Companies Act, 2013 and other statutory enactments.

- The corpus of the CSR policy would include:
 - 2 % of the average net profit;
 - Any income arising there from;
 - Surplus arising out of the above activity.

8. CSR Expenditure

Net profit for the purpose of allocation towards CSR means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

9. CSR Initiatives

Pursuant to Schedule VII of the Act and the CSR Rules, the Company shall undertake CSR activities included in its Annual CSR Plan, as recommended by the CSR Committee at the beginning of each year. The Committee is authorized to approve any modification to the existing Annual CSR Plan or to propose any new program during the financial year under review.

10 Failure to spend the CSR Money

If the Company fails to spend the required amount in a particular financial year, it is the duty of the Committee to submit a report in writing to the Board of Directors specifying the reasons for not spending the amount, which in turn shall be reported by the Board of Directors in their Annual Report pertaining to that particular Financial Year. Surplus, if any, arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.

11 Annual CSR Plan

The Annual CSR Plan is a yearly plan of CSR activities that would be placed before the Board of Directors of the Company based on recommendation of its CSR

Committee which outlines inter alia the following aspects of CSR initiatives of the Company:

- Project Proposals
- Targeted Beneficiaries and their key needs
- Alignment with Schedule VII
- Project Goals and milestones
- Activities and Timelines including expected closure dates
- CSR Budget with projections
- Monitoring mechanism
- Progress reporting and frequency of reports
- Risks and mitigation strategies
- Any other information as may be required by the CSR Committee

12. Collaboration

On recommendation of CSR Committee the company may plan CSR activity in collaboration with other Company/Agency, for effective implementation of CSR Plans.

13 Reporting and publication of CSR policy:

The contents of the CSR Policy shall be displayed on the Company's website, if any.

14. Policy review and future amendment

The Board will review the policy on recommendation of CSR Committee as may be required from time to time.

Further, the Board of Directors may revise/ amend this CSR Policy based on the recommendations of the CSR committee or to bring the same in line with the guidelines or amendments issued from time to time by Government on the subject.

- All CSR activities covered under this policy shall be carried out within India only.

15. FOCUS AREAS AND ACTION

The CSR Committee and Board has decided to carry out CSR activity in compliance of Schedule VII of the Companies Act, 2013 and any other Guidelines issued by the Government of India from time to time in the matter so that maximum benefit can be reached to the needy section of the Nation in the spirit of the Section 135 of the Companies Act, 2013.