

BEARYS GROUP



BEARYS PROPERTIES AND DEVELOPMENTS PRIVATE LIMITED

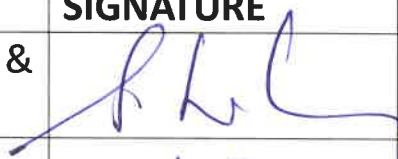


Delivering Excellence Consistently

POLICY NAME	Corporate Social Responsibility (CSR)	POLICY NUMBER	BG01-24		
POLICY TITLE	Corporate Social Responsibility				
DEPARTMENT	Administration and Human Resources	PAGE	11	OF	11
LAST REVIEWED	LAST REVISED	EFFECTIVE			
10/10/2024	10/10/2024	10/10/2024			

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A. APPROVALS – FIRST RELEASE

NO	NAME	TITLE	SIGNATURE	DATE
1.	Syed Mohamed Beary	Founder & CMD		10/10/24
2.	Abubakar Siddique Beary	Director		10/10/24
3.	Rajesh R	GM – HR		10/10/24

B. APPROVALS – SUBSEQUENT RELEASE

NO	NAME	TITLE	SIGNATURE	DATE
1.				
2.				
3.				

C. CHANGE RECORD

NO	REASON FOR CHANGE	PARTICIPANTS INVOLVED	DATE
1.	First Release	Balasubramanian	10/10/2024
2.			
3.			

D. DOCUMENT VERSION

NO	VERSION NUMBER	REASONING	DATE
1.	CSR-V1.0	First Release	10/10/2024
2.			
3.			

1. Introduction

Bearys Properties and Developments Private Limited (hereinafter referred to as the “**Company**”) is committed to conducting its business in a socially, environmentally, and ethically responsible manner. As a responsible corporate citizen, the Company aims to contribute to sustainable development by supporting initiatives aligned with social welfare, environmental protection, and community development.

This **Corporate Social Responsibility (CSR) Policy** is formulated in compliance with **Section 135** of the **Companies Act, 2013**, the **Companies (Corporate Social Responsibility Policy) Rules, 2014**, and any amendments or notifications issued by the **Ministry of Corporate Affairs (MCA)** from time to time.

2. Bearys Group

Bearys Group is a property development company of international repute and a front-runner of sustainable development in India. From humble beginnings as real estate agents in 1981, we have emerged as a vertically integrated property development and management company, addressing the complex needs of corporates, MNCs, government agencies and innumerable families and individuals in India and abroad.

While Corporate Social Responsibility (CSR) has become an established practice, we at Bearys believe that Individual Social Responsibility (ISR) is the most effective way to enrich society at large. Our commitment to social causes is not the outcome of business growth. It is, in fact, intrinsic to our core values. Right from inception together with our Entrepreneurship we also embraced Education and Environment as our focus areas. Business success notwithstanding, these noble causes will always remain our organizational priorities

2.1 Vision

God in his infinite mercy created man as the highest form of creation and provided us with everything we need for our sustenance and well-being. The entire universe, all the physical laws of the cosmos, the splendid earth and the abundance of nature were created for the benefit of humanity. Inspired by these benedictions, we at Bearys Group are committed to creating marks of excellence in a responsible and sustainable manner, so that this beautiful planet and its wondrous resources are preserved for the benefit of generations to come.

2.2 Mission

Building long-lasting relationships

‘We strive to earn the trust of our clients and build long-lasting relationships by delivering excellence consistently and upholding the highest standards of business integrity in all our operations. To this end, we will deploy our collective expertise in creating projects that are architecturally significant, functionally sound, environmentally conscious and offer the highest value for investment.’

2.3 Purpose

The Companies Act, 2013 has placed greater emphasis on CSR with rules that provide guidance on minimum CSR spend, focus areas, implementation mechanism and reporting to the shareholders of the company.

Bearys Groups CSR Policy has been designed keeping in view the company’s business vision, its CSR vision and long-term social objectives that the company wants to achieve. Bearys Groups CSR Policy has been created with the purpose to outline its CSR focus areas, review mechanisms, execution process and reporting mechanism.

2.4 Objective

The objective of this CSR Policy is to

- 2.4.1 Align the Company’s CSR activities with national development priorities and contribute towards achieving **Sustainable Development Goals (SDGs)**.
- 2.4.2 Promote sustainable community development by addressing social, economic, and environmental challenges.
- 2.4.3 Ensure active participation in initiatives related to **education, healthcare, environment conservation, and social welfare**, particularly in areas where the Company operates.

2.5 Responsibility of the Board of Directors

The responsibility of the Board of Directors shall be as under

- 2.5.1 To approve the CSR Policy and disclose the contents of such policy in its report and place it on the Company’s website.
- 2.5.2 Ensure that the activities proposed in the CSR Policy are undertaken
- 2.5.3 Ensure that the company spends, in every financial year, at least 2% of the average net profits of the company made during the three (03)

immediately preceding financial years, as required under Section 135 of the Companies Act, 2013 and Rules made thereunder

2.5.4 If a company fails to spend the sum as mentioned above, then the Board shall, in its report, specify the reasons for not spending the amount.

3. CSR Committee

A Corporate Social Responsibility Committee (“CSR Committee”) is constituted by the Board of Directors to oversee the CSR agenda of the Company. The committee is formed as per the requirements of Section 135 of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014.

The Board of Directors shall be empowered to take a decision for making or effecting changes in the constitution of the CSR Committee. The composition of the CSR Committee shall be disclosed in the Board of Directors’ Report.

3.1 Constitution of CSR Committee

In accordance with the Companies Act 2013, the Board of Directors have constituted a **CSR Committee** to oversee the implementation of CSR activities. The composition of the CSR Committee shall include:

- **Chairperson:** A Director or Independent Director.
- **Members:** At least two other Directors of the company.

3.2 Responsibilities of the CSR Committee

The CSR Committee shall:

- Formulate and recommend the CSR Policy to the Board, time to time.
- Recommend CSR activities, the amount of expenditure, and monitor project progress.
- Ensure compliance with legal obligations and review the CSR policy annually.

3.3 Meetings of CSR Committee

The CSR Committee shall meet at least once a year to discuss and approve the CSR spending. The meeting shall be held in any convenient location as the members decide. The physical presence of a minimum of two members of the committee shall constitute the quorum.

4. CSR Activities

The Company is hereby devoted to directing its CSR resources, to a reasonable extent, to improving the quality of life of the people by focusing on the social causes, including but not limited to the following areas

a. Eradicating Hunger, Poverty, and Malnutrition

- i. Promote access to nutritious food, healthcare (including preventive care), sanitation, and clean drinking water.
- ii. Support initiatives like the Swachh Bharat Kosh to enhance sanitation infrastructure.

b. Promoting Education and Vocational Skills

- i. Provide quality education, with a focus on special education and vocational skill-building.
- ii. Empower children, women, the elderly, and the differently abled through livelihood enhancement projects.

c. Empowering Women and Reducing Inequalities

- i. Promote gender equality through women's empowerment initiatives.
- ii. Establish homes, hostels, day care centers, and old age homes to support vulnerable groups, including orphans and senior citizens.
- iii. Implement programs to reduce inequalities among socially and economically backward communities.

d. Environmental Sustainability and Natural Resource Conservation

- i. Promote sustainable practices, ecological balance, and animal welfare.
- ii. Focus on agroforestry, conservation of natural resources, and maintaining the quality of soil, air, and water.
- iii. Support projects like the Clean Ganga Fund to restore natural ecosystems and rivers.

e. Preserving National Heritage, Art, and Culture

- i. Protect and restore historical buildings and monuments.
- ii. Set up public libraries and promote traditional arts and handicrafts to preserve cultural heritage.

f. Supporting Armed Forces and Their Families

- i. Provide welfare measures for armed forces veterans, war widows, and their dependents.

g. Promoting Sports and Physical Well-being

- i. Offer training and support for rural sports, Paralympic sports, Olympic sports, and other nationally recognized sports.

h. Contributing to Relief and Welfare Funds

- i. Contribute to the Prime Minister's National Relief Fund and other government funds focused on socio-economic development and welfare of Scheduled Castes, Scheduled Tribes, minorities, and women.
- i. Support for Technology Incubators**
 - i. Provide contributions to technology incubators within approved academic institutions to foster innovation and entrepreneurship.
- j. Rural and Slum Area Development Projects**
 - i. Implement rural development initiatives and support projects aimed at improving living conditions in urban slums.
- k. Promoting Road Safety Awareness**
 - i. Participate in road safety initiatives in line with Ministry of Corporate Affairs guidelines (Circular No. 21/2014, dated June 18, 2014).
- l. Compliance with Schedule VII of the Companies Act, 2013**
 - i. Engage in other activities as may be amended or prescribed from time to time under Schedule VII and related CSR Rules.

4.1 Implementation mechanism

The company may conduct or implement CSR programs by itself and/or through registered trusts, or societies and/or Section 8 (previously section 25) company with an established track record of at least three years in carrying on activities in the related area/s or as suggested by Ministry of Corporate Affairs vide circulars/notifications.

The company may collaborate or pool resources with other companies to undertake CSR activities and any expenditure incurred on such collaborative efforts would qualify for computing the CSR spending. The CSR Committee shall undertake sufficient due diligence of each of the CSR Activity before it is implemented.

Based on the recommendations of the CSR Committee, the Board shall approve the following:

- a. The specific CSR Activities that should be undertaken from time to time.
- b. The amount of the CSR Expenditure on each of the CSR Activity; and
- c. Whether the CSR Activities will be undertaken directly or through an implementing agency or in collaboration with any other companies, including by availing services of any NGOs and record reasons for the same.

Progress will be reported to the CSR Committee during the committee meetings. The progress on CSR programs undertaken by the Company will be reported in the Annual Report in the format prescribed by the CSR Rules 2014.

CSR projects will be implemented through a combination of:

- **Direct Execution:** Implementing CSR projects directly by the company.
- **Collaborative Initiatives:** Partnering with government bodies, NGOs, or other organizations.
- **Employee Volunteering:** Encouraging employees to actively participate in CSR initiatives.

Preference shall be given to the local areas around Bearys Group's operations, without limiting our outreach to other communities in need across India.

4.2 Monitoring, Evaluating and Reporting

The CSR team shall be responsible for day-to-day management of CSR related activities of the company. The team shall periodically report to the CSR committee regarding the financial and programmatic progress of CSR projects.

The CSR Committee will ensure:

- Periodic monitoring and evaluation of ongoing CSR projects.
- Conducting impact assessments, where required, as per guidelines prescribed.
- Documentation of CSR activities, expenses, and outcomes for internal records.

Annual Report and Disclosures

- CSR initiatives and their financial outlays will be disclosed in the company's **Annual Report** in the prescribed format.
- The CSR Policy will be made available on the company's official website.

All CSR projects undertaken shall be monitored on a regular basis. On-site monitoring would also be undertaken at least once a year to ensure on-track implementation. The CSR team shall be empowered to appoint an external third party to monitor or review or audit the progress (financial and programmatic) of the CSR projects.

4.3 Amendments to the CSR Policy

CSR Policy may be updated to align it with the changing requirement or changes in the legal and regulatory framework. Any revision in the Policy shall be approved by the Board of Directors. The CSR Committee shall review this policy

periodically and recommend necessary amendments to the Board in line with any changes in the legal framework or emerging CSR trends.

4.4 Effective Date

The CSR Policy shall be effective from the date of its approval by the Board of Directors. Provided, however, that all the acts done in pursuance of the earlier CSR Policy shall stand ratified and covered under this policy.

4.5 Format for Annual Report

1	2	3	4	5	6	7	8
Sl. No.	CSR project or activity identified	Sector in which the project is covered	Projects or programs. 1.Local area or other 2.specify the state and district where projects or programs was undertaken	Amount outlay (Budget) project or programs wise	Amount spent on the projects or programs Subheads 1. Direct expenditure on projects or programs 2. Overheads	Cumulative expenditure up to the reporting period	Amount spent: Direct or through an implementing agency