

CORPORATE SOCIAL RESPONSIBILITY POLICY

Aradhana Investments Limited seeks to be a good corporate citizen in all aspects of its operations and activities. To this end we have resolved to bring together our existing operating principles into one policy framework under the broad heading of Corporate Social Responsibility (CSR) to serve as a guide to the Board as well as our employees in all aspects of our work for the Company. The principles encompassed in this policy cover all areas of the Company's operations and have been developed and continue to be reviewed against and updated with reference to the relevant Companies (Corporate Social Responsibility Policy) Rules, 2014 and Schedule VII of the Companies Act, 2013. Taken together, these principles form our CSR policy.

Meaning:

The Companies (Corporate Social Responsibility Policy) Rules, 2014 defines "Corporate Social Responsibility" as Corporate Social Responsibility (CSR) means and includes but is not limited to:

- a. Projects or programs relating to activities specified in Schedule VII of the Act; or*
- b. Projects or programs relating to activities undertaken by the Board of Directors in pursuance of recommendations of the CSR Committee of the Board subject to the condition that such policy will cover subjects enumerated in Schedule VII of the Act.*

Compliance & Reporting of the policy:

The Compliance with this policy will be continuously monitored and subject to review by the Corporate Social Responsibility Committee constituted in accordance with Section 135 of the Companies Act, 2013.

The compliance with the principles covered in this policy will be reported to the stakeholders through the Directors' Report forming part of the Annual Report of the Company or its annual Corporate Social Responsibility Report.

Focus Areas:

In accordance with the requirements under the Companies Act, 2013, the Core Areas covered under the CSR policy:-

1. Measures to eradicate hunger and poverty:

The Management of the Company arranges for various weekly and monthly campaigns with the underlying aim of eradication of poverty and improvement of standard of living of the people living below the poverty line.

2. Promotion of education:

With the principal aim of promoting education the Company undertakes various Non-formal education programmes, supports schools with infrastructural facilities. It also funds other educational institutions. It also supports children for higher education.

3. Improving health and safety:

Through awareness programmes, health check-ups, provision of medicine & treatment facilities, set up blood donation camps, provides dialysis facilities free of cost, program for preventing diseases and building immunity. It is also involved in funding health improvement centres and hospitals and actively participates in various programs that facilitates a healthy and safe environment.

4. Ensuring environmental sustainability:

The Company tries to ensure environmental sustainability by promoting plantation drives in schools, villages, our manufacturing units & offices/business premises and other areas in general; conservation of natural resources; Animal welfare and veterinary services; Technical support and Knowhow for improving farming and building capacities of small farmers; Promoting alternate energy resources like solar power.

Implementation of CSR activities:

The Company will undertake its aforesaid CSR activities as approved by its CSR Committee through a registered trust in terms of the provisions of the Companies Act, 2013.

CSR Funds:

The total corpus for the purpose of carrying on the aforesaid CSR activities and projects shall include the followings:

- 2% of the average Net Profit made by the Company during immediately preceding three financial years.
- any income arising there from.
- surplus arising out of CSR activities carried out by the company and such surplus will not be part of business profit of the company.

Location of CSR Projects:

The CSR activities shall be implemented throughout India and primarily in the state of West Bengal.

Composition of the CSR Committee:

The CSR Committee shall consist of the following directors:

<u>S.No.</u>	<u>Name</u>	<u>Designation</u>	<u>Position</u>
1.	Raj Karan Lunawat	Non-executive Independent	Chairman
2.	Jai Kumar Kankaria	Managing Director	Member
3.	Pankaj Bothra	Non-executive Independent Director	Member

Funding of Projects and monitoring process:

The Company shall receive requests for funding of various CSR projects through its implementing agencies i.e. registered trusts throughout the financial year. The Company shall thereafter forward its recommendations to the CSR Committee for its approval.

The CSR department shall monitor the status of each CSR Project and will report its findings to the CSR Committee periodically.

Effective date:

This policy is effective from April 1, 2014.