

**BHARAT INFRASTRUCTURE AND ENGINEERING PRIVATE
LIMITED (CIN: U45200MH1998PTC116452)**

**Corporate Social Responsibility Policy
(CSR Policy)**

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We, **BHARAT INFRASTRUCTURE AND ENGINEERING PRIVATE LIMITED**, CIN: U45200MH1998PTC116452 having its registered office at 1, Bharat Corporate Avenue, Near Versova Police Station, D.N. Nagar, Andheri West, Mumbai- 400053, have adopted Corporate Social Responsibility (CSR) initiatives with its overall commitment to maintaining the highest standards of business performance acknowledging that we are a part of this greater society by virtue of which we owe economic, societal and ecological responsibilities to the community at large.

APPLICABILITY

Company's Corporate Social Responsibility ("CSR") policy has been developed pursuant to Section 135 of the Companies Act 2013 and relevant rules prescribed therein ("Act").

CSR COMMITTEE

In compliance with provisions of Section 135 of Companies Act, 2013, which requires constitution of a Corporate Social Responsibility Committee ("**CSR Committee**") of the Board of Directors, we formulated the CSR Committee which consists of following Directors as its Members:

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|---------------------------|-----------------------------|
| 1) Mr. ATUL AMBALAL BAROT | - Chairman of the Committee |
| 2) Mr. DHAVAL ATUL BAROT | - Member |

OBJECTIVE OF THE POLICY

The objective of the CSR policy is to enable the Company to take up projects for the common good and adopt good governance which could contribute to the society at large & create positive impact through its activities on the environment, stakeholders & society.

ROLE OF CSR COMMITTEE

The CSR Committee will play the following crucial role in fulfilling the Company's objectives:

1. Formulation and review of the CSR Policy indicating the activities to be undertaken by the Company towards CSR initiatives.
2. Recommendation of the amount of expenditure to be incurred on the CSR activities
4. Monitoring the status of the CSR activities and contribution made by the Company from time to time.

CSR BUDGET

CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Plan. Moreover, any surplus arising from any CSR Programmes shall be used for CSR. Accordingly, any income arising from CSR Programmes will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.

SCOPE OF CSR ACTIVITIES

This Policy shall apply to all CSR projects/programmes/activities undertaken by the Company in India as per Schedule VII of the Act.

CSR activities will include projects or programs or initiatives relating to those specified in Schedule VII to the Companies Act 2013, excluding activities undertaken in pursuance of normal course of business and shall operate within ambit of Companies Act 2013 and Rules thereunder.

IMPLEMENTATION

The Company's CSR programmes will be identified and implemented according to this policy.

The company will implement its CSR programs on its own or through eligible third parties.

Project activities identified under CSR could be implemented by specialized agencies, which could include: Registered trusts, Company registered under Section 8 of the Companies Act, 2013, Voluntary Organizations (VOs), NGO's, Panchayat, Zila Parishad etc.

MONITORING AND REVIEW MECHANISM

The CSR policy shall be monitored from time to time by the Committee to ensure that the policy is being implemented as per the Act & meets the objective set out in the policy.

EFFECTIVE DATE AND REVISION IN CSR POLICY

The CSR Policy is effective 1st April, 2015.

Further, any or all provisions of the CSR Policy would be subject to revision / amendment by the Board of Directors of the Company based on the recommendations of the CSR Committee or else in accordance with the guidelines on the subject as may be issued from time to time.

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