

**CORPORATE SOCIAL RESPONSIBILITY POLICY
("CSR POLICY")**

OF

JOYVILLE SHAPOORJI HOUSING PRIVATE LIMITED

Index

Sr. No.	Contents	Page Nos.
1.	Preamble	3
2.	CSR Vision	3
3.	CSR Objectives	3
4.	Definitions	4
5.	CSR Activities	5
6.	Exclusions from CSR activities	6
7.	CSR Expenditure/ Budget	7
8.	CSR Committee	7
9.	Responsibilities of the Board	8
10.	CSR Process	9
11.	CSR Communication	11

1. Preamble

Joyville Shapoorji Housing Private Limited (**“the Company”**) has adopted Corporate Social Responsibility (**CSR**) as a strategic tool for sustainable growth. For the Company, CSR not only means investment of funds for social activity, but also integration of business processes with social processes.

We, being a socially responsible corporate, acknowledge its role towards its stakeholders, the environment, its customers, employees and most essentially, the social scenario in which it operates. CSR, thus, becomes essential part of our existence.

2. CSR Vision

The Company and its promoters strongly believe in the principles of philanthropy and in “giving back to the community”. Our Vision is to promote shared development for every stakeholder of the Company, and the society at large.

3. CSR Objectives

Our CSR initiatives aim at supplementing the role of the Government of India in enhancing welfare measures for the society. The Company aspires to act as a responsible corporate citizen and focuses on building a vibrant future for the coming generations.

In this regard, the Company has made this policy which encompasses the Company’s philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare and sustainable development of the community at large and titles as the **“Corporate Social Responsibility (CSR) Policy”** based on the provisions of the Companies Act, 2013 (**“Act”**) and the Rules made thereunder as amended from time to time.

This Policy was originally formulated and recommended by the Board of Directors of the Company at its meeting held on November 12, 2025. The Board may amend or modify this policy as and when necessary, based on recommendation of the CSR Committee.

4. Definitions

“Act” means the Companies Act, 2013, as amended and modified from time to time.

“Administrative overheads” means the expenses incurred by the Company for ‘general management and administration’ of CSR functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular CSR project or programme.

“Board” means the Board of Directors of the Company.

“Company” means Joyville Shapoorji Housing Private Limited.

“Corporate Social Responsibility (CSR)” means and includes but is not limited to:

- i) Projects or programs relating to activities specified in Schedule VII to the Act as amended from time to time; or
- ii) Projects or programs relating to activities undertaken by the Company in pursuance of the recommendation of the CSR Committee and approved by the Board as per this Policy.

“CSR Committee” means Corporate Social Responsibility Committee as may be constituted by the Board pursuant to section 135 of the Act. It is hereby clarified that until the Company is required to form a CSR Committee under the Act or voluntarily constitutes a CSR Committee, the Board of the Company shall discharge the functions under the Act and this Policy.

“CSR Activities” shall mean the activities that the Company shall undertake, which shall be funded by the Company in accordance with the Act and the CSR Rules.

“CSR Policy” means the CSR Policy of the Company.

“CSR Rules” means the Companies (Corporate Social Responsibility) Rules, 2014, as amended and modified from time to time.

“Employees” means the employees of the Company or employees of its holding or subsidiary or associate company.

“Funding” shall mean the disbursements that are to be made towards CSR Activities as per this Policy, with the prior approval of the CSR Committee and the Board in accordance with the Act and the CSR Rules.

“International Organisation” means an organisation notified by the Central Government as an international organisation under section 3 of the United Nations (Privileges and Immunities) Act, 1947 (46 of 1947), to which the provisions of the Schedule to the said Act apply.

“Net Profit” means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:-

- (i) any profit arising from any overseas branch or branches of the company, whether operated as a separate company or otherwise; and
- (ii) any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act: Provided that in case of a foreign company covered under these rules, net profit means the net profit of such company as per profit and loss account prepared in terms of clause (a) of sub-section (1) of section 381, read with section 198 of the Act.

The net profit shall be calculated in accordance with the provisions of section 198 of the Act.

“Ongoing Project” means a multi-year project undertaken by a company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.

Words and expressions used and not defined in this Policy but defined under the Act shall have the same meanings respectively assigned to them in the Act.

5. CSR Activities:

In accordance with the requirements under the Act, the Company will undertake CSR Activities covered under Schedule VII of the Act (as may be amended from time to time), which inter alia includes:

- a) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh setup by the Central Government for the promotion of sanitation and making available safe drinking water;
- b) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- c) 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;
- d) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water, including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga;
- e) Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- f) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- g) Training to promote rural sports, nationally recognized sports and paralympic sports and olympic sports;

- h) Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) any other fund set up by the Central Governments for socio-economic development and relief and welfare of the scheduled castes, tribes, other backward classes, minorities and women;
- i) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);
- j) Rural development projects;
- k) Slum area development;
- l) disaster management, including relief, rehabilitation and reconstruction activities; and
- m) Such other activities/projects as may be determined by the CSR Committee and/or the Board in accordance with the relevant provisions of the Act or rules made thereunder (and as may be amended from time to time).

6. Exclusions from CSR activities:

- a) Any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level.
- b) Any expenditure for any activities for the benefit of the employees of the Company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019).
- c) Any amount contributed directly or indirectly to any political party under Section 182 of the Act.
- d) Activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services.
- e) Activities carried out for fulfilment of any other statutory obligations under any law in force in India.

7. CSR Expenditure/ Budget:

- a) Mandatory Obligation: At least 2% of the average net profits of the Company made during the 3 (three) immediately preceding financial years.
- b) Excess amount spent towards CSR may be set off against the requirement to spend under section 135(5) of the Act up to immediate succeeding 3 (three) financial years subject to the conditions that—
 - i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of CSR Rule 7.
 - ii) The Board of the Company shall pass a resolution to that effect.
- c) The total budget for the CSR projects will be decided by the CSR Committee and/or the Board.
- d) The surplus arising out of the CSR projects or programs or activities shall not form part of the business profits of the Company.
- e) CSR expenditure shall include all expenses including contributions to corpus, or on projects or programs relating to CSR activities approved by the Board on the recommendation of the CSR Committee but shall not include any expenditure on any activity which is not in conformity or not in line with the activities which fall within the purview of Schedule VII of the Act.

8. CSR Committee

▪ Constitution of the CSR Committee:

In accordance with section 135(9) of the Act, as the amount to be spent by the Company towards CSR does not exceed rupees fifty lakhs, the Company is not required to constitute a CSR Committee, and the Board of the Company shall discharge the functions of the committee.

However, as and when required the Board of the Company shall constitute a CSR Committee in accordance with the Act and the rules framed thereunder (as amended from time to time).

▪ Responsibilities of the CSR Committee:

- a) Formulating and recommending a CSR Policy to the Board, which shall indicate the activities to be undertaken by the Company and modalities of their execution;
- b) Formulating and recommending to the Board, an annual action plan in pursuance of the CSR Policy, which shall include the following:
 - i) The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act.

- ii) The manner of execution of such projects or programmes as specified in sub-rule (1) of Rule 4 of the CSR Rules.
 - iii) The modalities of utilisation of funds and implementation schedules for the projects or programmes.
 - iv) Monitoring and reporting mechanism for the projects or programmes.
 - v) Details of need and impact assessment, if any, for the projects undertaken by the Company.
- c) Recommending the amount of expenditure to be spent for the CSR Activities as per the CSR Policy;
- d) Reviewing CSR Policy whenever required and recommending changes to the Board; and
- e) Taking all such decisions which have not been articulated in the CSR Policy but are necessary for fulfillment of the CSR objectives as per the prevailing laws and this Policy.

▪ **Invitee(s) to the CSR Committee Meeting:**

The Committee may, at its discretion, invite anyone having expertise in CSR Activities to participate in the meetings of the CSR Committee and assist in the implementation of the CSR Policy. The invitees to the CSR Committee meetings shall be entitled to participate in the deliberations, but will not be entitled to vote at the meetings of the CSR Committee.

▪ **Meetings of the CSR Committee:**

The Committee shall meet as frequently as it deems necessary. It shall maintain minutes of each of its meetings.

▪ **Decisions by the CSR Committee:**

- a) The Committee shall, at all times, act in a manner that is consistent with the provisions contained in this Policy, the Act and the CSR Rules.
- b) The CSR Committee shall endeavor to arrive at all decisions by consensus of all the members. However, in the event the Committee is unable to arrive at such a consensus, the Chairperson of the CSR Committee may make the final decision.
- c) All decisions of the CSR Committee shall be ratified by the Board.

9. Responsibilities of the Board:

- a) It is the responsibility of the Board to ensure that the activities as are included in the CSR Policy of the Company are undertaken by the Company.

- b) The Board will ensure that the Company spends, in every financial year, **at least 2% of the average net profits** of the Company made during the 3 (three) immediately preceding financial years, as may be applicable to the Company.
- c) If the Company fails to do so, the Board will specify the reasons for not so spending, in the Report of the Board of Directors to be placed before the shareholders of the Company at the annual general meeting and make sure that such unspent amount shall be dealt with in accordance with the applicable provisions of the Act and the Rules framed thereunder (including any amendment thereto from time to time).
- d) The Board's Report of the Company shall include an annual report on CSR, as per the format prescribed under the Act.

10. CSR Process

▪ **Project Identification:**

A project may be identified based on any one or combined parameters as stated below (the said list is indicative and not exhaustive):

- a) Need based short term and long term initiatives on the identified areas.
- b) Engagement and deliberations with the key stakeholders, subject experts, competent organizations, consultancies, institutes and government authorities for project identification.
- c) Alignment with the Company's Group CSR policy, wherever applicable.
- d) Regulatory requirements as applicable.

▪ **Selection of Partners:**

A project may be developed and implemented with the help of competent external partners. The external project partners would be selected on the basis of:

- a) Subject expertise.
- b) Track record in the specific focused areas.
- c) Ability to reach the community.

▪ **Project Planning:**

An identified project proposal must be presented in detail, inter alia covering project objectives and realistic goals, impact areas, targets, and various stakeholders to be involved, including project partners and recipients of projects, project timelines and resources required.

▪ **Project Implementation:**

A project shall be implemented as per the annual action plan and with the help of partner organization. The project team must be provided with additional training, if required.

▪ **Our approach to implementation:**

1. We will strive to implement the aforesaid CSR Activities either on our own or through any implementing agency in terms of the Act and the CSR Rules as amended from time to time and as recommended by the CSR Committee and approved by the Board.
2. The Company may also engage international organisation(s) for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR Policy as well as for capacity building of its own personnel for CSR.
3. The Company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with the CSR Rules.
4. The Board shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management of the Company shall certify to the effect.
5. In case of ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall make modifications, if any, for smooth implementation of the project within the overall permissible time period.

▪ **Project Monitoring and Evaluation:**

Our projects aim at effectively and transparently implementing CSR projects for marginalized communities.

The project would be reviewed with the help of a set review and feedback mechanism to manage three R's viz. Reach, Resources and Results.

▪ **Monitoring Mechanism:**

1. Organizations receiving funding will be required to provide evaluation information on a periodic basis with details on the status of the CSR activities, including details concerning the project deliveries, costs incurred, in a manner prescribed by the Company.
2. A summary of these reports shall be tabled before the meetings of the CSR Committee.

3. Detailed reports will be available for further perusal of the CSR Committee members, as may be required.
4. The Company reserves the right to suspend payments to an organization that delays or fails to provide, to the Company's satisfaction, details concerning the use of the funding.

11. CSR Communication:

The Company may communicate information about its CSR Policy and implementation through any of the following channels:

- a) CSR section on website, if any.
- b) Newsletter/internal magazines to feature CSR updates.
