

CORPORATE SOCIAL RESPONSIBILITY POLICY

LANCOR HOLDINGS LIMITED
CIN - L65921TN1985PLC049092

COMPANY BACKGROUND:

Lancor Holding Limited (the Company) was incorporated on 04/01/1985. The Company has been engaged in the business of development of residential, commercial properties, investment in commercial properties. The Company has created a number of landmark projects, to name a few: 'Westminster' at Dr Radhakrishnan Salai, Mylapore, 'Ramco Tech Centre' at Sardar Patel Road, Adyar, 'Menon Eternity' at St. Mary's Road, Alwarpet, 'Residency, Regency, Regalia' at Sardar Patel Road, Adyar, 'The Atrium' at Kalakshetra Colony, Thirvanmiyur, 'The Central Park' projects at Sholinganallur. The Company has over 2,000 satisfied customers.

VISION STATEMENT:

"Promoting education, employment enhancing vocation skills especially among children, women, elderly, and the differently abled persons, by providing required skills sets, necessary infrastructure facilities"

OBJECTIVES OF COMPANY'S CSR:

COMPANY'S CSR policy intends to:

- ❖ Strive for economic development that positively impacts the society at large with a minimal resource footprint.
- ❖ Embrace responsibility for the Company's actions and encourage a positive impact through its activities on education, hunger, poverty, malnutrition, environment, communities, stakeholders and the society.

CSR BUDGET:

- ❖ The Board of Directors of the Company shall ensure that in each financial year the Company spends at least 2% of the net profits of the Company.
- ❖ In case of any surplus arising out of CSR projects the same shall not form part of business profits of the Company.
- ❖ The Company may collaborate or pool resources with other companies to undertake CSR activities.
- ❖ As per section-135 of the Companies Act, 2013 ("the Act"), the Company will report in its annual report to the shareholders of the company, reasons, if any, for under spending the allocated CSR Budget in any of the financial year.

VALIDITY AND MAINTENANCE OF CSR POLICY:

- ❖ This CSR Policy of the Company has been approved by the Board of Directors and shall remain in force until modified by the Board.
- ❖ The CSR policy will be maintained by the CSR Committee of the Board of Directors and reviewed by the Board of Directors at periodic intervals.

Focus Areas

In alignment with our vision of building lasting solution for communities in and around where we work and live a three pronged approach will be adopted as focus areas for Company's CSR efforts:

Lancor Holding Limited recognizes that ensuring lasting impact will require our CSR programmes to leverage our existing strengths, work with communities we have access to, focus our interventions and where possible facilitate new ways of delivering services to address the most pressing social challenges.

The CSR activities of the company are routed through the LANCOR FOUNDATION Trust specifically formed for the purpose of carrying out the CSR activities as mandated under section 135 of the Companies Act, 2013.

The focus area will include:

1.1 Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinkingwater;

1. Eradicating hunger

- Provision of food, nutrition supplement, clothes etc for the poor, children and other deprived sections of the society.
- Food Supply for the purpose of Disaster Relief
- Supporting nutrition in anganwadi centres and building capacities of anganwadi workers to this effect.

2. Poverty and malnutrition

- Trauma care around highways in case of road accidents.
- Provision of shelter for homeless.
- Supplementing of Govt. schemes like mid-day meal through additional nutrition.

3. Promoting preventive health care

- Giving medical and Legal aid, treatment to road accident victims.
- Provisions for aids and appliances to the differently- able persons

- Enabling access to, or improving the delivery of, public health systems.

4. Promoting sanitation, making available safe drinking water.

1. 2 Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects:

Promoting education

A. Promotion of Road Safety through CSR:

- Promotions of Education, Educating the Masses and Promotion of Road Safety awareness in all facets of road usage.
- Safety traffic engineering and awareness through print, audio and visual media.

B. Consumer Protection Services

- Providing effective consumer grievance redressal mechanism.
- Protecting consumer's health and safety, sustainable consumption, consumer service, support and complaint resolution.
- Consumer protection activities.

- Consumer Rights to be mandated.

- All consumer protection programs and activities on the same lines as Rural Development, Education etc.

C. Conservation and renovation of school buildings and classrooms

- Donations to IIM [A] for conservation of buildings and renovation of classrooms would qualify as “promoting education” and hence eligible for compliance of companies with Corporate Social Responsibility.

- Donations to IIMA for conservation of buildings and renovation of classrooms would qualify as “protection of national heritage, art and culture, including restoration of buildings and sites of historical importance” and hence eligible for compliance of companies with CSR.

- Non Academic Technopark TBI not located within an academic Institution but approved and supported by Department of Science and Technology.

- Research and Studies other than the respective areas of items defined in Schedule VII.

D. Monetary contributions to academic and other institutions with the objective of assisting students in their studies.

E. To provide Education Kit comprising study material, uniforms etc. to the poor students of Govt. Schools.

F. Adoption of Govt. Schools and / or providing financial assistance to set up various infrastructure facilities.

G. To extend support / educational assistance to children from financially backward families and underprivileged community as part of the company's social responsibility.

- H. To provide cash awards to students studying in School/Colleges and has secured high academic / professional records.
- I. To provide financial assistance to organizations working on the similar objective.

VOCATIONAL SKILLS

- Employment enhancing vocational training to the youth through its Youth Employability Programme. This will help the beneficiaries in improving their employability and improve their prospects economically. The programme will also have a positive impact on the confidence of the young beneficiaries and enhance their ability to face various challenges in life.
- Employment linked vocational skills training with aim to train and employ over thousands of youths in the rural areas over the next five years. Training will be executed by multiple specialized training providers.
- To conduct Drivers' training Programme so as to minimize road accidents.
- Setting up of ARTIIC (Applied Research Training and Innovation Centre) at Nasik. Centre will cover the following aspects as CSR initiatives for the benefit of the predominately rural farming community:
 - (a) Livelihood enhancement projects for capacity building for farmers covering best sustainable farm management practices.
 - (b) Training Agriculture Labour on skill development.

Any other projects related to the above.

1.3 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;

- Setting up homes, hostels and day care centers for woman; such other facilities for old age women; and adopting measures for reducing inequalities faced by socially and economically backward women through.
- Activities to prevent discrimination of girl child and promote girl education and employment.
- Activities for women empowerment and health care of pregnant women.
- Support old age homes.
- Support orphanages.
- To provide financial assistance to organizations working on the similar objective.
- Any other project related to the above.

Measures for reducing inequalities faced by socially and economically backward groups;

- Enabling access to, or improving the delivery of, public health systems.

1.4 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

Ensuring environmental sustainability

- Plantation drives in schools, villages, our manufacturing units & offices/business premises and other areas in general;
- Reviving endangered plants, promoting agro-forestry;

- Adoption of wastelands to cultivate plants;
- Promoting biodiversity;
- Animal welfare and veterinary services.
- Technical support and Knowhow for improving farming and building capacities of small farmers.
- Promoting alternate energy resources.

Ecological balance

- Doing our own research on the field for individual crops to find out the most cost optimum and Agri – ecological sustainable farm practices. (Applied research) with a focus on water management.

Maintaining quality of soil, air and water

- To do Product Life Cycle analysis from the soil conservation point of view.

Conservation of natural resources

- Renewable energy projects- Design and implement community based projects for energy efficiency & energy conservation, RE technology, pollution reduction and environment protection such as promoting use of solar energy, smokeless cookstoves, etc.

1.5 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

- Any activity related to the above.

1.6 Measures for the benefit of armed forces veterans, war widows and their dependents

- Any activity related to the above.

1.7 Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports

- Any activity related to the above.

1.8 Contribution to prime minister's national relief fund or any other fund set up by the Central Government or State Government for socio-economic development and relief and funds for the welfare of the Scheduled Castes, Scheduled Tribes and other backward classes, minorities and women.

- Any activity related to the above.

1.9 Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

- Any activity related to the above.

1.10 Rural development projects

- Strengthening rural areas by improving accessibility drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.
- We believe that the well-being of people living in rural areas ensures sustainable development. We will work with local administrations to achieve community development goals through construction of roads, providing drainage systems, electricity and rehabilitating natural disaster-affected victims in rural areas.
- Any project meant for the development of rural India will be covered under this.

1.11 Slum area development

- Any activity related to the above.
- To convert slums into homes simply by granting tenure to the residents located in nearby slums, in exchange for adherence to building norms and a nominal sum.
- To focus on further increasing the water supply system coverage of slum households under the highly successful community managed under the scheme.

(Explanation- For the purposes of this item, the term "slum area" shall mean any area declared as such by the central government or any state government or any other competent authority under any law for the time being in force).

1.12 Any other activity as notified or included in Schedule VII.

IMPLEMENTATION:

The ongoing CSR programs will be aligned with requirements of Section 135 of the Act. This CSR Policy builds on the learning and good practices of the ongoing CSR activities. To ensure the program is in compliance with the Act, a stocktaking of existing activities has been completed. Following which, it has been concluded that:

PROGRAM EXECUTION:

Lancor Holding limited has set up a dedicated CSR Implementation team to oversee day to day management of the CSR projects. The mode of implementation of the CSR projects can include either or a combination of any of the following:

- Direct implementation by Lancor Holding limited;
- Implementation through a trust/foundation/society set up by the Company;
- Implementation through partners such as NGOs, registered societies, trust(s) etc.

The Company may enter into **partnerships** with like-minded stakeholders, selected through a comprehensive **due diligence** process.

MONITORING AND EVALUATION OF PROJECTS:

A robust monitoring and evaluation system will be put in place. The monitoring and reporting mechanism is divided into three distinct areas:

- Program Monitoring
- Evaluation
- Reporting and Documentation

The monitoring and evaluation system will aim to ensure that every program has:

- Clearly defined outcomes, outputs and indicators that are linked with, where possible, measurable targets and time lines.
- A robust progress monitoring system for day to day implementation
- Undertake impact assessments as per the evaluation plan developed by the Company.
- Yearly reporting of CSR expenditure as per the requirements of the Act.

PROGRAM MONITORING:

- ❖ Programme monitoring mechanism will ensure:
 - the CSR policy is implemented as per the Act and the Rules framed thereunder ("the Rules")
 - The CSR policy is implemented ensuring that all projects/programmes as budgeted are duly carried out.
- ❖ CSR spends will be closely monitored and funds shall be released against verified utilizations as per the approved work plans. This may include monthly field visits, comprehensive documentation, and regular interaction with beneficiary communities.

- ❖ CSR spends will be audited in an accountable and transparent manner.
- ❖ Quarterly reporting and review by the CSR committee and six monthly reviews by the Board.

EVALUATION:

- ❖ A robust Impact monitoring mechanism and evaluation plan will be put in place.
- ❖ Expected outcomes, outputs and inputs will be clearly defined for each programme as per stated timelines.
- ❖ There shall be clarity about the scope of the programme and the need before evaluations are undertaken.
- ❖ Third parties may be engaged to ensure objective assessment across baseline and end line parameters.

DOCUMENTATION AND REPORTING:

- ❖ In preparation of the annual CSR report to the shareholders of the Company, the CSR Lead, the CSR Committee of the Board of Directors will ensure the following:
 - CSR projects and programs are properly reported.
 - Accountability is fixed at each level of process and implementation.
- ❖ Reports may include:
 - Annual CSR report to the Ministry of Corporate Affairs, Government of India as per the format prescribed in the Rules
 - Directors report to the shareholders
 - Quarterly internal review reports, field visits reports and audit reports

BOARD OF DIRECTORS:

- ❖ Ensure that during every financial year, funds committed by the Company for CSR activities are utilized effectively and will monitor implementation regularly.

- ❖ Disclose in its Annual Report names of the CSR Committee members, contents of the CSR policy and ensure annual reporting of its CSR activities on the Company website and the Director's Report.
- ❖ Ensure annual reporting of CSR policy to the Ministry of Corporate affairs of India, as per the prescribed format.

CSR COMMITTEE:

- ❖ **Composition of the CSR committee:** to consist of three or more directors of which, at least one will be an independent director. The CSR Committee shall consist of the following directors:

S.No	Name of the Member	Designation	Position in Committee
1.	Dr.Gowri Ramachandran	Independent Director	Chairman
2.	Mr.M.Hariharan	Independent Director	Member
3.	Mr.K.Harishankar	Independent Director	Member

❖ **Responsibility of the CSR committee:**

- Formulate the CSR policy and identify activities to be undertaken as per Schedule VII of the Companies Act 2013.
- Recommend CSR policy to the Board for its approval
- Recommend the CSR expenditure to be incurred.
- Regularly monitor the implementation of the CSR policy
- Change/modify the CSR policy as per requirement.

CSR IMPLEMENTATION TEAM:

- ❖ Composition of the CSR Team: will consist of members of the CSR team, Finance and Legal.
- ❖ Responsibility of the CSR Team:
 - Central coordinating point for the execution of CSR activities
 - Oversee day to day implementation of CSR activities
 - Interface with various organisation units/teams to ensure effective implementation of CSR programmes.
 - Regularly provide feedback and updates to the CSR committee
 - Plan annual budgets for CSR activities
 - Identify and manage partners to implement programmes as required.
 - Any other activities that may be required to effectively deliver the CSR programmes of the Company.

DISPLAY OF THE CSR POLICY ON THE WEBSITE OF THE COMPANY:

This CSR policy approved by the Board of the Company and shall be placed on the website of the company.

Questions

If you have any questions concerning this Policy or the Code of Conduct, please contact:

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