

THE ANUP ENGINEERING LIMITED

(Formerly known as ANVESHAN HEAVY ENGINEERING LIMITED)

Corporate Social Responsibility Policy

1 PREAMBLE - CSR: Arising out of implicit value system

Care for the society has been an intrinsic value for the promoters of the Lalbhai group. Though the rationale for long tradition of reaching out through planned interventions had always been nurturing society, at the base of it all lies an implicit value system. The underlying value system has a firm belief that only in a healthy society healthy businesses flourish and to ensure this, Business leaders must positively impact society. The Founders of the Lalbhai Group, believed that every human being needs to be engaged productively for accomplishment of his / her personal, social, spiritual and professional goals. To nurture this, the society needs institutions that equip individuals with relevant knowledge, appropriate skills and right attitude and values. The Founders were instrumental in setting up pioneering institutions for sustaining and improving Educational, Social, Cultural and Religious conditions that supported these values and thereby Ahmedabad's social and business progress. Ahmedabad Education Society, Indian Institute of Management Ahmedabad, Centre for Environmental Planning and Technology, H L College of Commerce and Lalbhai Dalpatbhai Institute of Indology are some examples. In addition, Strategic Help Alliance for Relief to Distressed Areas (SHARDA) Trust and Narottam Lalbhai Rural Development Fund (NLRDF), as Arvind Limited's CSR arms, have been working on programs of social renewal.

The initiatives of educational, social and cultural renewal have been supported much before the term CSR was coined. The Companies Act, 2013 mandates CSR operations by the corporate entities provides broad guidelines and sets up a reporting framework. The Anup Engineering Limited (Formerly Known as Anveshan Heavy Engineering Limited) Policy on Corporate Social Responsibility (TAECSR) has been put in place to facilitate the process.

2 RATIONALE FOR THE TAECSR:

We at The Anup Engineering Limited (Formerly Known as Anveshan Heavy Engineering Limited) have identified and supported well planned; tested and acclaimed initiatives under CSR. The TAECSR has been crafted to further strengthen and expand present initiatives, set a foundation for the initiation of new ones and define steps for monitoring, periodic evaluation, planned budgeting and structured reporting.

3 APPLICABILITY AND DURATION:

The Anup Engineering Limited (Formerly Known as Anveshan Heavy Engineering Limited) Policy on Corporate Social Responsibility (TAECSR) is same as applicable to all Lalbhai Group Companies. The Board of the Directors of group companies, however, may decide to follow Arvind Limited Policy on Corporate Social Responsibility or have their own CSR policy and undertake interventions. The TAECSR shall remain in force in its present form until it is amended, as and when required.

4 CSR VISION:

To impact positively, the quality of life of people, through initiatives of social, economic, educational, infrastructural, environmental, health and cultural advancement.

5 POLICY OBJECTIVE:

There are Five Objectives of TAECSR

5:01 To develop guidelines and articulate the broader intervention areas

5:02 To define projects and programmes under the articulated intervention areas

5:03 To define implementation mechanism and organisational base for implementation

5:04 To define monitoring mechanism, periodicity and reporting procedures

5:05 To define budgetary allocation

5:01 Articulating Broader Areas of Intervention:-

TAECSR will have projects and programmes under the following broad areas which will be synergetic to the broader areas that the Schedule VII of the Companies Act, 2013 has defined or will define from time to time. CSR Committee will update the intervention areas and the project and programmes every year and suggest changes if any, after approval of the Board.

- Education
- Employment Enhancing vocational skills for Employability
- Projects and programmes around the Sites /Offices of the Company
- Health
- Environmental Initiatives
- Agricultural Initiatives
- Water and Sanitation
- Art and Cultural Initiatives

5:02 Defining projects and programs:-

After approval of the Board, the CSR Committee will undertake defined CSR projects. The activities listed below are indicative and may not be limited to the following:

5:021 Education:-

1. Undertakes Education support for disadvantaged children, adolescents & youth through the program **Gyanda: fountain of knowledge**.
2. Establish a programme to provide scholarships / loans / fees to bright students from disadvantaged sections of the society for undertaking the responsibility of upgrading their potential.

5:022 Employment enhancing vocational skills for Employability:-

1. Undertake and expand the ongoing projects and programmes for making English Proficient and facilitate employment linkages.
2. Undertake studies to identify potential skill initiatives suitable for the region.

5:023 Initiating Projects and programmes around the Sites / Offices of the Company:-

1. Undertake "Need identification" and baseline studies in villages near the Project Sites / Offices of the Company.
2. Initiate appropriate rural development projects in villages near Project Sites / Offices of the Company.
3. Explore possibility of undertaking similar initiatives in other parts of India where the company is operating.

5:024 Health Initiatives:-

1. Explore possibility of Setting up Health Centers that offers consulting, diagnostics, treatment, medicines and other primary health services.
2. Support the Health Centre operations created with Company's support.

5:025 Cultural Heritage Initiatives:-

1. Supporting Projects and Programmes for protection and promotion of art, heritage and culture.

5:026 Support Initiatives:-

1. Undertake Research, Development, Communication and related initiatives that aid the initiatives of Arvind CSR.

5:03 Define implementation mechanism, organizational base:-

At The Anup Engineering Limited (Formerly Known as Anveshan Heavy Engineering Limited), we undertake initiatives for social advancement through specific institutions promoted by Arvind Limited. SHARDA Trust & NLRDF, the public charitable Trusts having credible history of two and three decades respectively, are actively working in the urban and rural landscape. This tradition will continue in the new CSR era also and SHARDA Trust and NLRDF will remain the CSR arms of all Lalbhai Group Companies. In addition, the Company would be a part of "Arvind Foundation" umbrella organization without undermining legal status and operational independence of SHARDA and NLRDF. The CSR initiatives will partner with like-minded individuals, organisations, Government, Corporate, Academic Institutions, Research, Development and Training bodies and NGOs which bring specific expertise. Last but not the least, CSR will also utilise the skills of vast majority of Employee Talents that the Company has in accomplishment of its CSR vision.

5:04 Define monitoring & evaluation mechanism, periodicity & report procedures:-

The Anup Engineering Limited (Formerly Known as Anveshan Heavy Engineering Limited) has set up Corporate Social Responsibility Committee (CSR Committee) as per the requirement of the Companies Act. The members of the CSR Committee are:

1. Mr. Punit Lalbhai - Non Executive Promoter Director
2. Mr. Arpit Patel – Non Executive Independent Director
3. Mr. Ganpatraj Chowdhary - Non Executive Independent Director

Periodicity and Reporting:-

- (i) The CSR committee will meet periodically to monitor the progress.
- (ii) Monitoring and evaluation criteria will be predefined.
- (iii) The CSR committee will send two reports to the Board every year.

5:05 CSR Budget and planned allocation:-

The CSR Budget will be equivalent to minimum 2% or more of the average net profit of the Company of last three years that will be utilised on CSR initiatives.

6 Concluding Remark:

The Anup Engineering Limited (Formerly Known as Anveshan Heavy Engineering Limited) Policy on Corporate Social Responsibility (TAECSR) is a part of all the Lalbhai group companies to undertake CSR initiatives. This policy envisages to guide CSR initiatives for all group companies and help them maintain a common CSR thought thread. For doing so, the Board of Directors of all the group companies are expected to define an annual budget, select a focus area and work with the overall Arvind CSR team to undertake CSR initiatives. The Anup Engineering Limited (Formerly Known as Anveshan Heavy Engineering Limited) along with Arvind CSR team and the organisations representing CSR will undertake the initiatives on behalf of the companies with an aim to maximise effectiveness and efficiency