



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

PREAMBLE:

Valor Estate Limited ('VEL') (formerly known as D B Realty Limited), believes that in alignment with its vision, VEL through its CSR initiatives will continue to enhance value and promote social sustainability, sustainable development of the environment and social welfare of the people and society at large.

CSR VISION STATEMENT:

The Company through its CSR initiatives, will enhance value creation in the society and in the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth in the society and community around it along with environmental concern. The objective of this policy is to operate its business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders and other objects of the Company

Further, take up those programmes directly or indirectly, that benefit the communities and society at large, over a period of time, in enhancing the quality of life & economic wellbeing of the local populace

SHORT TITLE & APPLICABILITY:

This policy is titled as the 'VEL CSR Policy' and it shall apply to all CSR initiatives and activities taken up by the company for the benefit of the society.

CSR ACTIVITIES:

VEL shall identify any one or more of the following areas for its CSR activities:

- (i) eradicating hunger, poverty and Malnutrition, promoting preventive health care and sanitation including contribution to Swach Bharat Kosh set up by the Central Government for the promotion of sanitation and making available safe drinking water;
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backwards groups;
- (iv) 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 set up by the Central Government for rejuvenation of river Ganga ;

- (v) protection of national heritage, art and culture including restoration of buildings and sites of historical importance and work of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- (viii) contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and funds for the welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- (ix) contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) rural development projects;
- (xi) such other matters as may be prescribed by Competent Authority and thought fit by Board of Directors from time to time.

The above list is illustrative and not exhaustive. The CSR committee of Board of Directors is authorized to consider also CSR activities which not included in this list. It is clarified that, all the aforesaid activities or programs shall be undertaken in India only and also that such programs and activities shall not be designed to benefit only the employees of the Company and their families.

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE:

The Corporate Social Responsibility Committee shall consist of three or more Directors amongst which one shall be an Independent Director.

The Committee shall hold meetings as and when required, to discuss various issues on implementation of the CSR Policy of VEL.

VEL may enter into an agreement with other trusts, NGOs, etc. for the arrangement of undertaking CSR activities on its behalf and the said trusts, NGOs, etc. shall report to CSR Committee from time to time on progress of CSR programs undertaken by them. CSR initiatives of the Company will also be reported in the Annual Report of the Company.



The Company may collaborate with other companies for undertaking the CSR projects/programmes subject to fulfilment of separate reporting requirements as prescribed in the Rules.

The CSR activities shall not include any activity undertaken by the Company in pursuance of the normal course of business of a Company.

BUDGET:

For achieving its CSR objectives through implementation of meaningful & sustainable CSR programs, VEL will allocate statutorily permissible atleast 2% of its average past three financial year's net profit and the said amount shall be worked out in accordance with the requirements of the provisions of law for the time being in force and this would be the overall Annual CSR Budget.

SPENDING:

Any unspent / unutilized CSR allocation of a particular year, will be dealt with in due compliance of law for the time being in force. Any surplus arising out of CSR Projects or Programs or activities may not form part of the business profits of a Company

EXECUTION, MONITORING & REPORTING:

The CSR Committee shall:

1. Prepare and propose the CSR plan with the execution modalities and implementation Schedules to the Board.
2. Periodically appraise the Board on the status of the CSR plan.
3. Institute a transparent monitoring mechanism for implementation of the CSR projects, programmes or activities undertaken by the Company.

To fulfill the above responsibilities, the CSR Committee would be equipped with necessary resources. The CSR team has been setup to ensure effective implementation of the CSR activities. The team would submit status reports of the projects/programmes to the CSR Committee on a periodic basis.

All disclosures, display and reporting requirement related to CSR shall be made in accordance with the provisions of the Act and Rules made thereunder.