

CSR POLICY OF
MARATHON NEXTGEN REALTY LTD(MNRL)-(Updated)

I. The Policy Initiatives :

MNRL is a part of "Marathon Group" and "Marathon Group" believes that corporate organisations should think beyond profit and look out for the wellbeing of society. Guided by the vision of its founder Chairman,(Late) Ramniklal Z Shah - 'profit is not just a set of figure but of values' - "Marathon Group " has over the years working on a modest informal CSR agenda. One of the obligations of the "Group" is to contribute certain %age of the net profit to the developmental activities .

For us in Marathon Group, promoting education, including special education and employment enhancing vocation skills has been a part of our DNA. The Group believes in the Rehabilitation of the Slums and improvement of their lives , providing the basic opportunities of livelihood . This entails transcending business interests and grappling with the "quality of life" challenges that Slum dwellers /communities face, and working towards making a meaningful difference to them.

This give us pride to be a corpotaee citizen by actively engaging ourselevs and contribute to the social and economic development. In so doing build a better, sustainable way of life for the weaker sections of society.

Since its inception the "Group" as a whole, continuously been contributing certain percentage of its profit for education and allied development initiatives.

As per ,the Ministry of Corporate Affairs(MCA) through its," Companies (Corpotaee Social Responsibility Policy) Rules ,2014 read with Section 135 of the Companies Act 2013,and amended time to time it has become necessary to update and document our activities as enumerated above as a Group Policy.

II.:COMPOSITION OF THE CSR COMMITTEE:

The Committee shall be constituted with following members only if the CSR expenditure amount to be spent by a company exceeds fifty lakh rupees:

- 1) With minimum three directors of which at least one director shall be an Independent Director from the Board of the Company; or
- 2) With minimum two directors from the Board of the Company, in case the company is not required to appoint an independent director under sub-section (4) of section 149 of the Companies Act 2013 ("the Act").

As mandated, a CSR Committee is already set up by MNRL, consisting of 3 directors with the above composition.

The duty of the said CSR Committee includes monitoring the mechanism for implementation of CSR projects, activities undertaken by the Company .

III.CSR Activities:

The CSR activities/projects undertaken /to be undertaken at the Group level i.e. Education and Slum Rehabilitation & development is as per the ongoing agenda of things of our normal course of business. The Group may, upon the approval of the CSR Committee, undertake the approved activities through a trust, society or a registered company and preference will be given to the local area and areas around its operations .

The Group may also collaborate with other outside Group or Companies for undertaking projects or programme or CSR activities in such a manner that the concerned CSR Committee report in accordance with the rules framed there under.

The Group may build CSR capacities of its own personnel as well as those of their implementing agencies through institutions with established track record.

It is explicitly understood that programme or activities that benefit the Employees of the Group and their families shall not be construed as CSR activities.

The following activities are the list of CSR projects or programs as per Schedule VII of the Companies Act 2013:

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh 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 backward groups.
- (iv) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, 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 works of art; setting up public libraries; promotion and development of traditional art and handicrafts;
- (vi) 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 widow;
- (vii) Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports
- (viii) Contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;

- (ix) 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 Organization (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)
- (x) Rural development projects
- (xi) (xi) Slum area development.

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.

(xii) Disaster management, including relief, rehabilitation and reconstruction activities.

IV.Reporting:

Disclosure in Board's Report

The Ministry simultaneously also modified the "format" for the annual report on CSR activities to be included in the Board's report.

The disclosures under annual report are reduced to certain extent i.e. the detailed information which is required to be given w.r.t On-going projects is now not a part of disclosure in Board report.

V.CSR Spends- Responsibility of the Board:

The Board of MNRL shall ensure that the Company spends ,in every financial year,at least 2% of the average net profits of the Company made during the three immediately preceeding financial years. Amount to be spent for CSR: The company spends, in every financial year, at least two per cent. of the average net profits of the company made during the three immediately preceding financial years. The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year. Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. Where a company spends an amount in excess of requirement, such excess amount may be set off against the requirement to spend up to immediate succeeding three financial years. ♦ CSR

♦ **Display of CSR activities on its website:** The Board of Directors of the Company shall mandatorily disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access. ♦ Transfer of unspent CSR amount Until a fund is specified in Schedule VII for the purposes of subsection (5) and(6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act.

VI.ADDITIONAL MANDATE:

- i. Oversee the company's conduct with regard to its corporate and societal obligations and its reputation as a responsible corporate citizen;
- ii. Oversee activities impacting the quality of life of various stakeholders;
- iii. Monitor the CSR Policy and expenditure of the material subsidiaries (material subsidiary" means a subsidiary whose income or net worth exceeds ten percent of the consolidated income or net worth, respectively, of the Company and its subsidiaries in the immediately preceding financial year).

VII. IMPLEMENTATION PROCEDURE/ ANNUAL ACTION PLAN:

The CSR programmes will be designed systematically with defined timelines, objectives and deliverables. All the CSR initiatives will have well-defined KPIs to measure impacts on target

VIII: Failure to spend and Penalty:

If the Company fails to spend such amount the Board should, report specify the reasons for not spending the amount.

The Company shall disclose the contents of the policy in the Board Report and if the amount is not spend on CSR, then the Company shall disclose the reasons for not spending the amount.

**APPROVED BY THE BOARD OF DIRECTORS AT THEIR MEETING HELD ON
:Wednesday,May24,2023.**

Place: Mumbai,

Date: May 24,2023.

MMRRL