Regd. Office: Mody Building 27, Sir R.N. Mukherjee Road, Kolkata-700 001, India • Tel.: +91 33-2248 0166-68 • Fax: +91 33-2248 1922, 8957 CIN: U93000WB1998PLC086303 • E-mail: ho@heilindia.com • Website: www.heilindia.com

CORPORATE SOCIAL RESPONSIBILITY POLICY

Objective:

The main objective of CSR Policy is to lay down guidelines for Corporate Social Responsibility activities of Hindusthan Engineering & Industries Limited (HEI). The Policy is formulated in compliance with the requirements of the Companies Act, 2013 and rules made thereunder.

Implementation:

The Board of Directors has constituted a Corporate Social Responsibility Committee (CSR Committee or the Committee) with one of its member being an Independent Director of the Company.

The Committee shall identify programs/projects in which the CSR activities can be undertaken and recommend to Board from time to time.

The programs/projects can be undertaken through a Trust established by the Hindusthan Group.

CSR activities may also be undertaken in collaboration with other Companies in The Group.

The Committee may also recommend allocation of certain portion of the CSR spend for some identified activities/Projects.

The programs/projects which benefit only to the employees of the company and their families shall not be considered for CSR activities.

The Committee shall endeavor for CSR capacity building of the personnel of the Company and / or of the institution carrying CSR activities of the company and not more than 5% of the total CSR budget shall be spent on such CSR capacity building exercise.

Projects/ Programs to be Undertaken:

The activities to be undertaken by the Company as CSR activities shall be the projects/programs relating to the activities/ subjects specified enumerated in the Schedule VII of the Companies Act, 2013 or any amendment thereto or modification thereof.



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The committee shall from time to time decide/recommend to the Board on, CSR activities to be undertaken, the geographical area covered, agencies or trusts or NGO's with which the projects/activities are to be undertaken, amount to be spent or various projects whether ongoing or fresh.

The CSR programs or projects or activities that the Company plans to undertake through following Trust and the modalities of the execution / implementation of the same are as under:-

The Hindusthan Group has already formed "Hindusthan Kalyan Kosh" which is a non-profit making trust duly registered under Section 80G of the Income Tax Act. It has also a registered society named Mody Institute of Education & Research (MIER) which is a non-profit making entity duly registered under Section 80G of the Income Tax Act. The Corporate Social Responsibility will be carried out through either one or both the above entities.

They will contribute to the projects of Mody School which is providing education to girl child from class III to class XII as per CBSE program.

They shall also contribute to the projects of Mody University of Science and Technology which is established by Rajasthan State legislature & covered u/s 2(f) of the UGC Act, 1956. The University has different colleges of Arts, Science & Commerce and those covering different disciplines of engineering, management & law upto Phd level. The University is exclusively for women thereby contributing to gender equality & empowering women.

Additionally, scholarship and such other means may be continued at a later stage.

Monitoring Process

The Committee shall monitor the above projects, programs and implementation and execution of the same from time to time and report the same to the Board of Directors on a periodical basis.

The committee shall on completion of every Financial Year, submit to the Board, details of the CSR spent during the Financial Year and reasons for the actual spent being less than the limits prescribed by the law, if any.

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The report on CSR shall form part of Directors Report of the Company.

The Committee shall recommend changes / editions to be carried out in the policy to the Board from time to time.

Disclaimer:

The activities undertaken by the Company in pursuance of its normal course of business shall not be considered as CSR activities.

The surplus arising out of the CSR projects or programs or activities shall not form part of the business profits of the company.