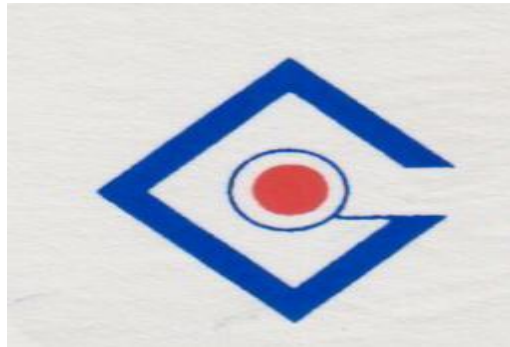


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Corporate Social Responsibility Policy (Doc. No.: GO/CSR/01)



Gokul Overseas

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CSR Policy Reviewed & Approved By: Mr. Dharmendrasinh Rajput (MD)

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1. Context

While Gokul Overseas is Partnership Firm, though not mandatory to form CSR policy However, as good governance Gokul Overseas has framed the CSR policy and constituted committee. GO as continues its manufacturing activities related to building products and packaging, it has not lost sight of its commitment to play its role as an enlightened Partnership Firm. Corporate Social Responsibility has always been on its agenda.

The CSR Committee so constituted formulated Policy on Corporate Social Responsibility (CSR Policy) and recommended the same to the Partner of this partnership firm for its approval.

1.1 Objectives of this policy

As a Partnership Firm, i.e. Gokul Overseas acknowledges its obligation to contribute to the economic development of the State and the country while improving the quality of life of its workforce and their immediate families as well as of the community and society at large. While undertaking statutorily required CSR projects / programmes within India, the Partnership Firm will consistently strive for opportunities to meet the expectation of its stake holders by pursuing the concept of sustainable development with focus on improving the quality of life. The Partnership Firm also places emphasis on development of knowledge and skills in the young, both male and female, in order to make them economically productive.

This Policy shall be read in amended from time to time and will, inter-alia provide for the following:

- Establishing a guideline for compliance with the provisions of Regulations to Dedicate percentage of Partnership firm's profits for social projects.
- Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting
- Creating opportunities for Partner to participate in socially responsible initiatives.

1.2 CSR Activities

The Policy recognizes one or more of the following focus areas as notified as under:

- i) Eradicating extreme hunger and poverty;
- ii) Promotion of education;
- iii) Promoting gender equality and empowering women;
- iv) Reducing child mortality and improving maternal health;
- v) combating human immunodeficiency virus, acquired immune deficiency syndrome, malaria and other diseases;
- vi) Ensuring environmental sustainability
- vii) Employment enhancing vocational skills;
- viii) Social business projects;
- ix) 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 Schedule Castes, the Schedule Tribes, other backward classes, minorities and women;
- x) Rural development projects;
- xi) Such other activities as the Firm of Partner may consider being appropriate.

CSR activities shall be undertaken as projects, programs of activities (either new or ongoing) undertaken in pursuance of the normal course of business of the firm.

1.3 The Geographic Reach:

The Firm shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility.

However, the Committee may identify such areas other than stated above, as it may deem fit, and recommended it to the partner for undertaking CSR activities.

1.4 Annual spends / Allocation of Funds:

- i) The Firm would spend adequate amount on CSR activities.
- ii) The Firm may build CSR capacities of its personnel and/or those of its Implementing agencies through Institutions with established track records of at least three financial years but such expenditure shall not exceed five percent of total CSR expenditure of the Firm in one financial year

2. CSR Committee:

2.1 Guiding Principles for Constitution of Guiding Principles for Constitution of CSR Committee

The Committee will meet at least twice in a year to discuss and review CSR activities and Policy. Such other meetings of the Committee can be convened as and when deemed appropriate.

The Committee members may attend the meeting physically or via such audio-visual means as permitted under the Act. The Committee shall have the authority to call such Partner(s), senior official (s) and or externals, as it deems fit.

2.2 Committee Members

Sr. No.	Name of the Partner	Chairman / Members
1	Mr. Balwantsinh Rajput	Chairman
2	Mr. Dharmendrasinh Rajput	Member
3	Mrs. Bhikhiben Rajput	Member

2.3 Scope & functions of CSR Committee:

2.3.1 Notified CSR Activities:

The Functions of CSR Committee will, inter-alia, include the following:

- i) Eradicating extreme hunger and poverty;
- ii) Promotion of education;
- iii) Promoting gender equality and empowering women;
- iv) Reducing child mortality and improving maternal health;
- v) combating human immunodeficiency virus, acquired immune deficiency syndrome, malaria and other diseases
- vi) Ensuring environmental sustainability;
- vii) Employment enhancing vocational skills;
- viii) Social business projects;
- ix) 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 Schedule Castes, the Schedule Tribes, other backward classes, minorities and women.

2.3.2 Ancillary Activities:

- a) To publicize the CSR Policy and initiatives org-wide, especially through mailers, Screen saver and Policy documentation.
- b) To plan and carry out workshops to increase Partner awareness on various projects and initiatives.

- c) Such other activities as directed by the Committee of Member decided and/or as Deemed appropriate and expedient by the Committee for the furtherance of CSR objectives of the Firm, in pursuance with the Regulations.

2.3.3 Transparent Monitoring System

The CSR Committee, shall prepare a transparent monitoring mechanism for ensuring implementation of the projects / programs / activities proposed to be undertaken by the GOKUL OVERSEAS.

The CSR Committee shall have the authority to obtain professional advice from external sources and have full access to information contained in the records of the GOKUL OVERSEAS as well as the powers to call any Partner/ external consultant or such other person(s) and for such purpose as may be deemed expedient for the purpose of accomplishments of overall CSR objectives.

3. PROCEDURES:

3.1 Funding:

- a) The Partnership Firm will set aside, certain amount for CSR activities,
- b) The details of the proposed expenditure for respective Financial Year, towards CSR activities informed to the partners.
The same shall be amended annually according to the Financial Year after the review by the Committee or at such time, as the Committee may deem fit.
- c) Tax treatment of CSR spend will be in accordance with the Income Tax Act, 1961 as may be notified by Central Board of Direct Taxes (CBDT).

3.2 Planning & Implementation:

- a) A list of CSR projects/programmes which the Firm plan to undertake during the implementation year will be laid down before the committee at the beginning of each year, specifying modalities of execution in the areas/sectors chosen and implementation schedules for the same.
- b) Identification of projects and the executing agency/NGO will be made, inter-alia, by assessing the following:
 - i) Project Objectives
 - ii) Baseline survey – As-is and To-be state basis, accordingly the outcome of the project will be measured
 - iii) Implementation schedules – Timeless for milestones of the project will need to be prescribed and agreed upon.
 - iv) Responsibilities and authorities
 - v) Major results expected and measurable outcome including the expenses/charges ration as against the actual CSR spend.
- c) If the Firm decides to set up a Trust or Society or Foundation or any other form of entity operating within India to facilitate implementation of its CSR activities in accordance with its stated CSR Policy, the following shall apply:
 - i) The Firm would need to specify the projects/ programmes to be undertaken by such an organization, for utilizing funds provided by it;
 - ii) The Firm shall establish a monitoring mechanism to ensure that the allocation is spent for the intended purpose only.
- d) The Firm may also conduct/implement its CSR programmes through Trusts, societies, or operating in India, which are not set up by the Firm itself, herein collectively referred to as 'CSR Partner' or 'CSR Partner(s)'.
- e) Such spends may be included as part of its prescribed CSR spend only if such organizations have an established track record of at least three years in carrying on activities in related areas.

- f) Firm may collaborate or pool resources with other companies to undertake CSR activities within India.

3.3 Projects / Partners:

CSR Committee in consultation of the Partner of this Firm will identify suitable projects for implementation in line with the objectives of the Firm and requirements laid down under the Regulations. These projects would be executed either directly by the through CSR Partner(s)

3.4 Criterion for CSR Partner(s) and Agreement:

- a) While identifying projects, CSR Committee will assess CSR Partner(s) organizations who would execute the projects at the grass root level. At a minimum they need to meet the following criteria
 - i) CSR Partner has a permanent office/address in India;
 - ii) The CSR Partner is a Trust, Society, or Section 8 Company having an established track record of three years in undertaking similar CSR programs or projects in pursuance with the relevant regulations;
 - iii) Possesses a valid income-tax Exemption Certificate
 - iv) The antecedents of the CSR Partner are verifiable
 - v) Have requisite framework to report progress/status of the projects on a quarterly basis on agreed parameters
 - vi) Maintain a required level of auditable records on the CSR initiatives conducted in conjunction with Gokul Overseas as agreed mutually.
- b) Once the project/program is approved, Gokul Overseas and the CSR Partner will be required to enter into an agreement as per the standard MOU requirements.

3.5 Review and Monitoring:

The CSR Committee will review the philanthropic activities of the Firm and will provide progress update to the Partner of Firm every twelve months/such other intervals as deemed fit.

4. Monitoring:

- a) Appropriate documentation and amendments of the CSR Policy, annual CSR activities, reports on execution by CSR Partner(s) and expenditures will be undertaken on a regular basis and same will be available to the Partner of the Firm
- b) Initiatives undertaken on the CSR front will be reported in the Report of the Firm.
- c) The CSR Committee and persons / entities authorized by it, will conduct due diligence checks on the current projects/partners on a quarterly basis and report anomalies, if any, immediately.
- d) Based on analysis of current projects, carry out roadmap planning for allocation of budget and selection of projects. The same will be done at least once in a financial year.
- e) Plan and publish an annual calendar of major events so as strive for maximum participation of stakeholders.

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