

APOLLO SINDOORI HOTELS LIMITED

[Pursuant to clause (o) of sub-section (3) of section 134 of the Act and Rule 9 of the Companies (Corporate Social Responsibility) Rules, 2014]

As part of the CSR program, the company is presently engaged in several projects which are socially relevant and demanding in the locality surrounding its corporate office area and other locations where the company has branches or other place of business. The company may continue to undertake / fund project, programs or activities of the following nature and also undertake such other activities as may be approved by the board as is falling under Schedule VII of the Act 2013.

POLICY ON CORPORATE SOCIAL RESPONSIBILITY (CSR)

1.0 Title and Applicability

Apollo Sindoori Hotels Limited ('Company') has developed its Corporate Social Responsibility Policy ('Policy') in accordance with section 135 of the Companies Act 2013 and the rules made there under.

2.0 CSR Mission Statement

- Create a meaningful and lasting impact on the communities in remote areas by helping them transcend barriers of socio-economic development
- Extending Comprehensive Integrated Healthcare Services to the community.
- Develop the skills of the youth through high quality education and research in healthcare services

3.0 CSR Objectives

- The Company will undertake social projects in designated communities and villages, in a focused manner, for maximum positive impact.
- In consultation with the local community, the Company will design and effectively implement projects in areas such as healthcare, rural development, education and skills development.
- Promote preventive healthcare to the most remote corners of the country.
- Making quality healthcare accessible and affordable for all.
- Develop and implement the education, healthcare, water and sanitation, infrastructure development and elderly care projects for sustainable socio-economic development of the rural areas.

- Develop the skills of the youth by setting up educational institutions, improving infrastructure of the existing institutes, providing scholarships for deserving students and promoting research in the healthcare services sector

4.0 Validity of CSR Policy

The Board may amend the CSR policy as may be required from time to time. The policy was last reviewed by the Board on 19-05-2023.

5.0 CSR Programme Areas

The Company will focus primarily on the following programmes:

A. Rural Development

The Company aims to create a meaningful and lasting impact on the communities in remote areas by helping them transcend barriers of socio-economic development. A Model of Integrated Healthcare Service will be established to improve the health of communities through:

- Access to quality education for youth
- Educate and train ASHA workers, nurses, midwives, etc. in delivery of Comprehensive Healthcare
- Promotion of Research in Healthcare
- Promotion of healthy lifestyles
- Access to drinking Water
- Access to Sanitation
- Developing infrastructure facilities for socio-economic development
- Elderly care

The programme will bridge the gap by uniting the Governmental Efforts with the Industry and Peoples Participation.

C. Education and Skills Development

The Company will develop the skills of the youth through high quality Education in Paramedical and Allied Services and Research in Healthcare.

High quality Education in Paramedical and Allied Services will be provided by setting up educational institutions, improving infrastructure of the existing institutes and providing scholarships to the meritorious students from underprivileged and economically weaker communities.

D. Promote Research in Healthcare

The Company will promote Research and disseminate information on latest technology and trends in Hospitality sector.

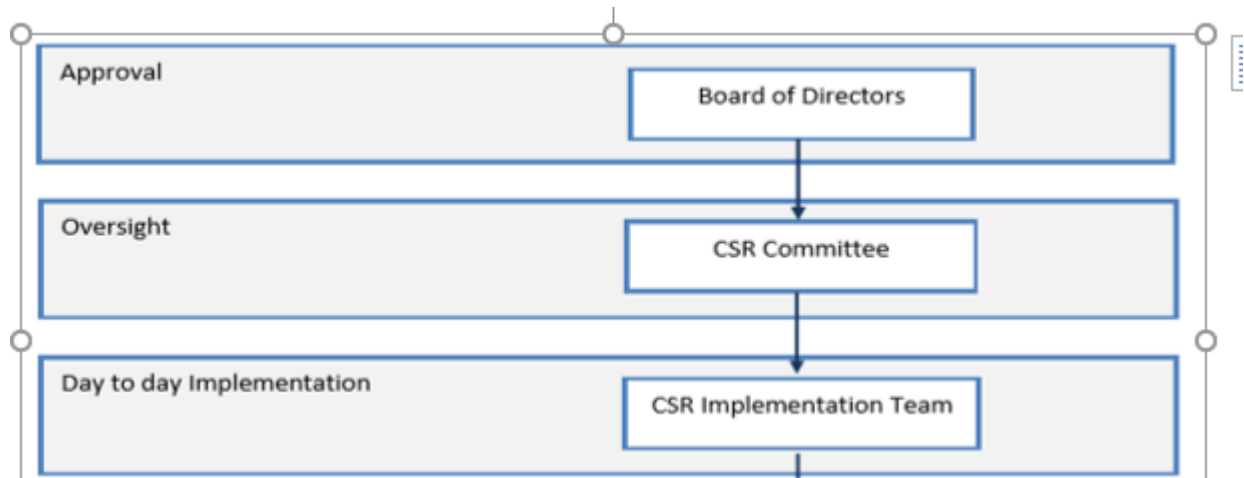
6.0 CSR Budget

- The Board of Company shall ensure that in each financial year, the Company spends at least 2% of the average net profit made during the immediate three preceding financial years.
- The unutilized CSR budget from the 2% of the average net profit will be parked in a CSR Fund (Corpus) created by the company. This Fund would also include any income arising there from and any surplus arising out of CSR activities
- In case of any surplus arising out of CSR projects the same shall not form part of business profits of the Company.
- The Company may collaborate or pool resources with other companies (its subsidiary companies) to undertake CSR activities.

7.0 CSR Implementation

- The CSR projects will be implemented in a time-bound manner with clear objectives, plan, targets and robust monitoring and evaluation mechanisms.
- The Company's ongoing CSR projects will be aligned to the Policy. This Policy builds on the learnings and good practices of the CSR projects initiated by the Company.
- The Company will enter into partnerships with the government, not for profit organizations, business partners and communities to create multiplier effect of its social projects.
- The Company has set up dedicated teams for implementation of CSR projects. The mode of implementation will include a combination of direct implementation and implementation through trust/foundation/society set up by the Company and partners such as Foundations, Registered Societies, Trusts, etc. The Company will select its partners after appropriate due diligence.
- The Company will use services of expert agencies, consultancy firms etc. wherever required for carrying out baseline surveys, guidance on project design and implementation, third-party monitoring and evaluations, impact assessment surveys etc.
- The teams responsible for implementing various CSR projects are mentioned in the section on the Governance Structure of the Policy.
- The heads of the respective teams managing CSR projects will be authorised to sign Memorandums of Understanding (MOUs)/Agreements with the implementing partners after taking required approvals.

8.0 CSR Governance Structure



9.0 Roles and responsibilities

A. The Board

The Board of Directors of the Company will be responsible for:

- Approval of the CSR Policy of the Company
- Disclosing the content of the Policy in its report and place the Policy on the Company's website in such a manner as prescribed under Section 135 of the Companies Act 2013 read with the CSR Rules
- Ensuring that the social projects included in the Policy are undertaken by the Company
- Ensuring that the Company spends, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years in pursuance of the Policy
- Ensuring that the Company gives preference to the local areas around its operations for spending the amount earmarked for CSR projects
- Ensuring that it specifies the reasons in its report for not spending the earmarked amount in case the Company fails to spend such amount.

B. CSR Committee

- Composition of the the CSR committee: The composition of the CSR Committee of the Board is as under.

2. The Composition of the CSR Committee: The committee comprises of two independent directors and one executive director and constitution is as provided below:

Ms. Sindoori Reddy	Chairman
Mr. George Eapen	Member
Mr. G. Venkatraman	Member

The Board shall have the power to make any change(s) in the constitution of the Committee.

- **Responsibility of the CSR Committee:**
 - Formulate and recommend the CSR Policy to the Board for approval. The Committee shall indicate the projects to be undertaken by the Company as specified in Schedule VII
 - Monitor the Policy from time to time and recommend changes to the Board.
 - Recommend the amount of expenditure to be incurred on CSR projects
 - Institute a transparent monitoring mechanism for ensuring implementation of the social projects undertaken by the Company

C. CSR Coordinating Team

- **Responsibility of the CSR Implementation Team**
 - ✓ Act as central coordinating point for the delivery of CSR activities
 - ✓ Coordinate with the implementing departments for project design and implementation of CSR programmes in compliance with section 135 of the Companies Act and the CSR Rules
 - ✓ Plan annual budgets for CSR projects in coordination with the implementing departments and make a proposal to the CSR Committee
 - ✓ Identify and manage partners to implement programs as required
 - ✓ Report to the CSR Committee the progress on CSR projects and status of CSR expenditure once in each quarter
 - ✓ Documentation and reporting of all CSR activities of the Company in pursuit of the Companies Act and the CSR Rules

- ✓ Any other activities that may be required to effectively deliver the CSR programs of the Company

10.0 Monitoring and Reporting Framework

Project monitoring

The Company will institute a well-defined monitoring and evaluation mechanism to ensure that each social project has:

- Clear objectives developed out of the societal needs that are determined through baseline studies and research
- Clear targets, timelines and measureable parameters wherever possible
- A progress monitoring and reporting framework that is aligned with the requirements of Section 135 of the Companies Act and the CSR Rules

Budget monitoring

The Company will establish an accounting system to ensure project wise accounting of CSR spend

Reporting framework

The Company will monitor progress on CSR projects and CSR spend and report to the top management quarterly and the CSR Committee half yearly.

The Company will report CSR performance in its annual report as per the structure and format prescribed in the notified CSR Rules.