Peregrine

Corporate Social Responsibility Policy
Peregrine Guarding Private Limited
("PGPL")

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Corporate Social Responsibility Policy means a statement containing the approach and direction given by the Board of the company, taking into account the recommendations of its Corporate Social Responsibility Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan

OBJECTIVE

As a Security Service Provider, Peregrine Guarding Private Limited ("PGPL") through this Policy and its initiatives under CSR aims at:

- Creating and driving positive impact and outcomes in social development
- To strive towards building and sustaining a healthier humanity
- To provide good education to non-privileged Children's i.e providing right infrastructure, medical facilities, teachers etc.
- Sustainable investment towards fulfilling its obligations as a member of society and enhancing its relationships with all its stakeholders and communities including its employees
- Fulfilling its social responsibilities alongside its normal business activities

As stated earlier our policies and objectives will evolve, and over time harmonize our long term and short term goals in CSR. Our ultimate goal is to wholesomely and positively impact the communities we are associated with.

APPLICABILITY

This policy is applicable to Peregrine Guarding Private Limited ("PGPL") as it is falling under the Section 135 of the Act.

Every company having net worth of rupees five hundred crore or more, or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during the immediately preceding financial year shall constitute a Corporate Social Responsibility Committee of the Board consisting of three or more directors, out of which at least one director shall be an independent director.

A Company covered under subsection (1) of section 135 which is not required to appoint an Independent director pursuant to sub-section (4) of section 149 of the Act, shall have its CSR Committee without such director.

A Private company having only two directors on its Board shall constitute its CSR Committee with two such directors.

LEGISLATION

This Corporate Social Responsibility (hereinafter referred to as 'CSR') Policy is framed in terms of the Companies Act, 2013 (hereinafter referred to as 'the Act') read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as 'the CSR Rules'), as amended from time to time.

DEFINITION

1. "Act" means the Companies Act, 2013;

2. "Average Net Profit" means the profit calculated in accordance with the provisions of Section 198 of the Act.

3. "Administrative overheads" means the expenses incurred for 'general management and administration of CSR functions in the company but shall not include expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular CSR project or programme.

4. "Board" means Board of Directors of the Company.

5. "Company" means Peregrine Guarding Private Limited ("PGPL")

6. "CSR Committee" means the Committee as constituted by the Board of Directors of the Company in compliance with Section 135 of the Act and rules made thereunder;

7. "Net profit" means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:-

   i) any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
   ii) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act:

8. "net worth" means the aggregate value of the paid-up share capital and all reserves created out of the profits ,securities premium account and debit or credit balance of profit and loss account, after deducting the aggregate value of the accumulated losses, deferred expenditure and miscellaneous expenditure not written off, as per the audited balance sheet, but does not include reserves created out of revaluation of assets, write-back of depreciation and amalgamation;

9. "Ongoing Project" means a multi-year project undertaken by a company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was

commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification.

10. "Rules" mean the Companies (Corporate Social Responsibility Policy) Rules, 2014.

11. "Turnover" means the aggregate value of the realization of amount made from the sale, supply or distribution of goods or on account of services rendered, or both, by the Company during a financial year.

Words and expressions used and not defined hereinabove but defined the Act and / or Rules shall have the same meanings respective assigned to them in the Act and / or Rules, as the case may be.

POLICY STATEMENT

The CSR policy approaches this area under the philosophy that the company efforts should strive towards building and sustaining a healthier humanity. The policy elucidates the concept of growing our business in a socially and environmentally responsible manner through an active role in empowering communities and driving social development and positive change.

The policy holds itself out as a forward looking aspirational charter which recommends liberal interpretation, promotes activity under the spirit of partnership and recommends that initiatives be targeted to the needs of the disadvantaged, vulnerable and marginalized sections of society. While the underlying guidance is to bring alignment of varied activities under the focus umbrella, it recognizes the need to record presence and contribution in such weak links in society where its mere presence and support could drive significant social benefit.

The activities that can be undertaken by the Company on CSR shall be as specified in Schedule VII to the Companies Act, 2013, as amended from time to time and shall include the following:

(i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the 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 centres 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, 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 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 widows];

(vii) training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports

(viii) contribution to the prime minister's national relief fund 8[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 Organisation (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) 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.

CSR COMMITTEE

The CSR Committee has been constituted in accordance with the provisions of the Act.

Role of CSR Committee is:

a. To Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities, programs, areas or subjects ("CSR activities") to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013;

b. To recommend the amount of expenditure to be incurred on the specified activities in a financial year.

c. To monitor and recommend any subsequent change/ modification to the CSR Policy to the board, in the Corporate Social Responsibility Policy of the company from time to time.

d. To recommend the Board on the guiding principles for selection, implementation and monitoring of CSR activities;

e. To Formulate and recommend to the Board, an Annual Action Plan in pursuance of this Policy including;

- the list of CSR Projects or Programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Companies Act, 2013;
- manner of execution of above-mentioned projects or programs;
- modalities of utilization of funds and implementation schedules for the projects or programs;
- monitoring and reporting mechanism for the projects or programs and
- the details of need and Impact Assessment, if any, for the projects undertaken by the Company.

f. To recommend the Board to alter the Annual CSR Action Plan at any time during the financial year based on the reasonable justification to that effect.

g. Any other matter/thing as may be considered expedient by the members in furtherance of and to comply with the CSR Policy of the Company.

CSR EXPENDITURE AND ALLOCATION

In every Financial Year, the Company shall spend at least 2 (two) per cent of the average net Profits of the Company (as calculated under section 198 of the Act) made during the three immediately preceding Financial Years, in pursuance of this Policy.

In case of average CSR obligation of Rupees Ten Crore or more in pursuance of sub-section 5 of Section 135 of the Act in the three immediately preceding financial years, impact assessment shall be undertaken through an independent agency of the CSR projects or programs having outlays of Rs. One Crore or more and which have been completed not less than one year before undertaking the impact study. In such case, the Company may book the expenditure towards CSR for that financial year which shall not exceed two percent of the total CSR expenditure for that financial year or Rs. 50 Lacs, whichever is higher.

CSR amount may be spent for creation or acquisition of a capital asset to be held by (a) a company established under section 8 of the Act or a Registered Public Trust or Registered Society having charitable objects and CSR Registration Number; or (b) beneficiaries of the said CSR project in the form of self-help groups, collectives, entities; or (c) a public authority.

Any surplus arising out of the CSR activities shall not form part of the Business Profit of the Company and shall be ploughed back into the same project/program or transferred to the Unspent CSR Account and spent in pursuance of this Policy and Annual Action Plan of the Company or transfer such surplus amount to a fund specified in Schedule VII of the Act within a period of six months of the expiry of the Financial Year.

If the Company fails to spend the stipulated CSR amount, the Board shall, in its Annual Report on CSR, specify the reasons for not spending the amount. Further, any unspent amount, other than unspent amount relating to an ongoing project, will be transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. Further, unspent CSR funds of ongoing projects will be transferred within a period of 30 days from the end of the financial year to a special account opened by the company in any scheduled bank called the "Unspent Corporate Social Responsibility Account". Such amount shall be spent by the company towards CSR within a period of 3 financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of 30 days from the date of completion of the third financial year

SELECTION, IMPLEMENTATION, MONITORING

CSR programmes will be undertaken at various locations to the best possible extent within the defined ambit of the identified Project/ Program. The time period/duration over which a particular programme will be spread, will depend on its nature, extent of coverage and the intended impact of the programme.

Identification of projects / programmes at various locations will be done by means of the following:

(a) Need identification Studies by the Senior Management/ professional institutions/agencies.
(b) Internal need assessment by cross-functional team at the local level.
(c) Receipt of proposals/requests from Charitable institutions and NGOs
(d) Suggestions from the Board of Directors/senior management level.

The Board of the Company shall ensure that the CSR activities are undertaken by the Company itself or through -:

(a) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company; or

(b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or

(c) any entity established under an Act of Parliament or a State legislature; or

(d) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Explanation.- For the purpose of clause (c), the term "entity" shall mean a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act.

Every entity covered under (a) to (d) as mentioned above, which intends to undertake CSR activity shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar and provide the unique CSR Registration Number to the company.

The Company may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that the CSR Committee of the respective companies is in a position to report separately on such projects or programs.

The CSR projects or programs or activities undertaken in India only shall amount to CSR Expenditure except as provided under the Act from time to time.

The CSR Committee of the Company shall institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company.

The Compliance with this Policy / CSR activities / projects will be continuously monitored by the CSR Committee and the Policy is subject to review by the Board of Directors of the Company, supported by the CSR Committee, and the compliance will be reported to the stakeholders through the Board's Report.

REPORTING AND COMMUNICATION

The Board's Report of the Company covered under section 134(3) of the Act shall include an Annual Report on CSR containing particulars as per prescribed format. In case of applicability of impact assessment as detailed hereinabove, the said impact Assessment Report shall also form part of the Board's Report of the Company.

AMENDMENT

This Policy will supersede or override previous policy on Corporate Social Responsibility made in this regard.

Any or all provisions of CSR policy would be subject to revision/amendment in accordance with the guidelines/directions on the subject as may be issued by Govt. of India, from time to time and would also form an integral part of this policy as and when they become applicable and the policy may be considered to be amended to that effect as such.

The Board of Directors of the Company shall have the powers to revise/modify/amend this Policy from time to time, as the Board may think fit, based on the recommendations to be made by the CSR Committee.

---------- *END OF POLICY* ----------

Note*-This policy has been approved by the Board of Directors of the Company at their meeting held on 02.05.2023.*