LORVEN INTERNATIONAL LIMITED
CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

A framework for responsible and sustainable social development

1. INTRODUCTION

Lorven International Limited (hereinafter referred to as the "Company") believes that the growth and development of an organisation should go hand in hand with the welfare and development of society.

The Company recognises its responsibility towards society and the environment and is committed to contributing towards sustainable and inclusive growth. The Company believes in conducting its business in a socially responsible manner and contributing to the improvement of the quality of life of people, particularly the underprivileged and disadvantaged sections of society.

The Company shall undertake Corporate Social Responsibility (CSR) activities in accordance with the provisions of Section 135 of the Companies Act, 2013, read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, Schedule VII of the Act and amendments made thereto from time to time.

2. OBJECTIVES

The principal objective of this Policy is to provide a broad framework for the Company's CSR initiatives and to guide the manner in which such initiatives are identified, undertaken, and monitored. The objectives of the Policy are as follows:

a) To contribute towards the sustainable development and welfare of society.
b) To promote social, economic, and environmental development.
c) To support initiatives aimed at improving the quality of life of underprivileged and weaker sections of society.
d) To encourage activities that support the overall development and well-being of communities.
e) To undertake CSR initiatives in a responsible and transparent manner.
f) To ensure effective utilisation of CSR funds and appropriate monitoring of CSR activities.

3. CSR ACTIVITIES

The Company shall undertake CSR activities in accordance with the activities specified under Schedule VII of the Companies Act, 2013, as amended from time to time.

The Company may undertake any one or more activities falling within the scope of Schedule VII of the Companies Act, 2013, depending upon the requirements of society, availability of resources and the Company's CSR objectives.

The Company shall ensure that the activities undertaken qualify as CSR activities under the applicable provisions of the Companies Act, 2013 and the rules made thereunder.

4. GUIDING PRINCIPLES

The Company shall be guided by the following principles in the selection, implementation and monitoring of CSR activities:

a) CSR activities shall be considered with due regard to the needs of the community, the intended beneficiaries, and the broader objectives of sustainable and inclusive development.

b) CSR activities shall be selected and undertaken in accordance with the activities permitted under Schedule VII and the applicable provisions of the CSR Rules.

c) CSR initiatives shall be implemented in a transparent, accountable, and responsible manner, with due attention to the proper utilisation of funds and achievement of their intended objectives.

d) The Company shall endeavour to ensure that the funds allocated towards CSR activities are applied only for the purposes for which they have been approved and in accordance with applicable law.

e) The progress and outcomes of CSR activities shall be reviewed periodically, as considered appropriate to assess implementation and identify any measures that may be required for effective execution.

5. IMPLEMENTATION OF CSR ACTIVITIES

The Company may undertake CSR activities either on its own or through eligible implementing agencies in accordance with the provisions of the Companies Act, 2013 and the rules made thereunder.

The Company may also collaborate with other companies for undertaking CSR projects or programmes, provided that the respective companies are able to report separately on such projects or programmes.

Where CSR activities are undertaken through implementing agencies, the Company shall ensure that such agencies fulfil the eligibility criteria prescribed under the applicable CSR Rules.

The Company shall ensure that the CSR activities are implemented in a transparent and effective manner and that the funds allocated for such activities are utilised for the intended purposes.

6. CSR EXPENDITURE

The Company shall ensure that it spends, in every financial year, at least two per cent of the average net profits made during the three immediately preceding financial years, or such other period as may be prescribed under the applicable provisions of the Companies Act, 2013, towards CSR activities, subject to the provisions of the Act.

The CSR expenditure shall be incurred in accordance with the provisions of the Companies Act, 2013 and the rules made thereunder.

The Board shall ensure that the funds allocated towards CSR activities are utilised for the approved purposes and in the prescribed manner.

7. MONITORING AND REVIEW

The Company shall establish an appropriate mechanism for monitoring the implementation of CSR activities and utilisation of funds.

The CSR Committee, wherever constituted, shall monitor the implementation of the CSR Policy, and review the progress of CSR activities from time to time.

The Board of Directors shall satisfy itself that the funds disbursed towards CSR activities have been utilised for the purposes and in the manner approved by it.

The Company may obtain such reports, statements, utilisation certificates or other information as may be considered appropriate for monitoring CSR activities and ensuring compliance with applicable law.

8. ROLE OF THE CSR COMMITTEE

The CSR Committee, wherever constituted, shall be responsible for:

a. Formulating and recommending the CSR Policy to the Board.

b. Recommending the amount of expenditure to be incurred on CSR activities.

c. Monitoring the CSR Policy from time to time.

d. Reviewing the progress of CSR activities and making suitable recommendations to the Board.

Where the Company is not required to constitute a CSR Committee under the provisions of Section 135 of the Companies Act, 2013, the functions of the CSR Committee shall be discharged by the Board of Directors.

9. RESPONSIBILITIES OF THE BOARD

The Board of Directors of the Company shall:

a. Approve the CSR Policy and ensure its implementation.

b. Ensure that the CSR activities undertaken by the Company are in accordance with the provisions of the Companies Act, 2013 and the rules made thereunder.

c. Ensure that the Company spends the prescribed amount towards CSR activities.

d. Monitor the utilisation of CSR funds and ensure that such funds are utilised for the approved purposes.

e. Disclose the contents of the CSR Policy, composition of the CSR Committee and other prescribed particulars in the Board's Report and on the Company's website, if any.

f. Ensure compliance with the applicable provisions relating to unspent CSR amounts.

10. DISCLOSURE AND REPORTING

The Company shall make such disclosures and provide such information relating to CSR as may be required under the Companies Act, 2013 and the rules made thereunder. The prescribed CSR disclosures shall form part of the Board's Report and shall be made available on the Company's website, if any, in the manner and to the extent required under applicable law.

The Company shall maintain such records and supporting information relating to CSR activities and expenditure as may be necessary for statutory reporting, internal review, and compliance with the applicable provisions. CSR-related information shall be disclosed in a transparent and accurate manner, in accordance with the prescribed requirements.

11. GENERAL

This Policy shall be interpreted in accordance with the provisions of the Companies Act, 2013, the Companies (Corporate Social Responsibility Policy) Rules, 2014, Schedule VII and other applicable laws, as amended from time to time. In the event of any inconsistency between this Policy and the applicable statutory provisions, the statutory provisions shall prevail.

Any matter not specifically covered under this Policy shall be dealt with in accordance with the applicable provisions of law.

Nothing contained in this Policy shall be construed as permitting any activity or expenditure which is excluded from the definition of CSR under the applicable provisions of the Companies Act, 2013 and the rules made thereunder.

12. AMENDMENTS TO THE POLICY

The Board of Directors may amend, modify, or revise this Policy from time to time, as may be considered necessary, subject to the provisions of the Companies Act, 2013 and the rules made thereunder. Any such amendment shall be made in accordance with the applicable statutory requirements and shall take effect from such date as may be determined by the Board.

The CSR Policy shall remain in force until amended or replaced by the Board of Directors of the Company.