THAKKERS GROUP LIMITED
CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. Preamble

Thakkers Group Limited ("the Company") recognizes that Corporate Social Responsibility ("CSR") is an integral part of its business philosophy and corporate values. The Company believes in conducting its business in a socially responsible, ethical and sustainable manner while contributing towards economic development and improving the quality of life of the community and society at large.

This Policy has been framed in accordance with the provisions of Section 135 of the Companies Act, 2013, read with Schedule VII thereto and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

The Policy also aligns with the principles of transparency, accountability and stakeholder value creation embodied in the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. Objective

The objectives of this Policy are:

- To define the Company's CSR philosophy and framework.
- To identify and undertake CSR activities in areas specified under Schedule VII of the Companies Act, 2013.
- To ensure compliance with the statutory obligations relating to CSR.
- To contribute towards sustainable development and inclusive growth.
- To establish a monitoring and reporting mechanism for CSR activities.
- To create measurable social and environmental impact through CSR initiatives.

3. Applicability

This Policy shall apply to all CSR projects, programmes and activities undertaken by the Company in India in accordance with Section 135 of the Companies Act, 2013 and the applicable Rules made thereunder.

4. Definitions

Unless the context otherwise requires:

Act means the Companies Act, 2013 and amendments thereto.

CSR means Corporate Social Responsibility as defined under Section 135 of the Act and the CSR Rules.

CSR Committee means the Corporate Social Responsibility Committee constituted by the Board pursuant to Section 135 of the Act.

Board means the Board of Directors of the Company.

Net Profit shall have the meaning assigned under Section 198 of the Companies Act, 2013.

Ongoing Project shall have the meaning assigned under the CSR Rules.

5. CSR Vision

To contribute meaningfully towards social development, environmental sustainability, education, healthcare and community welfare while creating long-term value for society and stakeholders.

6. CSR Committee

The Board shall constitute a CSR Committee in accordance with the provisions of Section 135 of the Companies Act, 2013.

The CSR Committee shall consist of such number of Directors as may be prescribed under the Act and Rules.

7. Roles and responsibilities of The CSR Committee

The CSR Committee shall:

1. Formulate and recommend the CSR Policy to the Board.
2. Recommend CSR projects and programmes.
3. Recommend the amount of expenditure to be incurred on CSR activities.
4. Monitor implementation of CSR projects and programmes.
5. Review progress of CSR activities periodically.
6. Formulate and recommend the Annual Action Plan.
7. Monitor utilization of CSR funds.
8. Review impact assessment reports wherever applicable.
9. Recommend changes in CSR Policy whenever required.
10. Ensure compliance with the Companies Act, 2013 and CSR Rules.

8. Role of the board

The Board shall:

- Approve the CSR Policy.
- Approve the Annual Action Plan.
- Ensure implementation of approved CSR activities.
- Ensure spending of the prescribed CSR obligation.
- Monitor implementation through the CSR Committee.
- Make disclosures in the Board's Report and on the Company's website.
- Ensure transfer of unspent CSR amount in accordance with applicable law.

9. CSR activities

The Company may undertake CSR activities specified in Schedule VII of the Companies Act, 2013, including but not limited to:

(A) Education

- Promotion of education.
- Special education.
- Employment-enhancing vocational skills.
- Digital literacy programmes.
- Scholarships and educational assistance.

(B) Healthcare

- Promoting preventive healthcare.
- Medical camps.
- Healthcare infrastructure support.
- Sanitation and hygiene initiatives.
- Public health awareness programmes.

(C) Environmental Sustainability

- Tree plantation drives.
- Water conservation projects.
- Biodiversity protection.
- Renewable energy initiatives.
- Waste management and recycling programmes.

(D) Rural Development

- Rural infrastructure development.
- Drinking water projects.
- Community welfare programmes.
- Village development initiatives.

(E) Women Empowerment

- Women skill development programmes.
- Gender equality initiatives.
- Self-help group support.

(F) Social Welfare

- Support to underprivileged sections of society.
- Senior citizen welfare.
- Support for differently-abled persons.
- Livelihood enhancement projects.

(G) Disaster Relief

- Disaster management.
- Relief and rehabilitation activities.
- Contribution to approved relief funds.

(H) Other Activities

Any other activity as may be specified under Schedule VII of the Companies Act, 2013 from time to time.

10. CSR expenditure

The Company shall spend in every financial year at least 2% of the average net profits made during the three immediately preceding financial years or such amount as prescribed under applicable law.

CSR expenditure shall include:

- Direct expenditure on approved CSR projects.
- Administrative overheads within statutory limits.
- Impact assessment expenditure as permitted under the Rules.

CSR expenditure shall not include activities undertaken in pursuance of the normal course of business except as permitted by law.

11. Annual action plan

The CSR Committee shall formulate and recommend an Annual Action Plan which shall include:

- Approved CSR projects.
- Manner of execution.
- Modalities of utilization of funds.
- Monitoring and reporting mechanism.
- Project implementation schedule.
- Impact assessment requirements, if applicable.

The Board may alter such Plan at any time during the financial year based on recommendations of the CSR Committee.

12. Implementation of CSR Projects

CSR projects may be undertaken:

- Directly by the Company; or
- Through eligible implementing agencies registered with the Central Government and possessing a valid CSR Registration Number.

The Company shall conduct due diligence before engaging any implementing agency.

13. Ongoing Projects

For ongoing projects:

- The Board may approve multi-year projects not exceeding the period prescribed under the CSR Rules.
- Unspent amounts relating to ongoing projects shall be transferred to the Unspent CSR Account within the statutory timelines.
- Such amounts shall be utilized in accordance with the provisions of the Act.

14. Treatment of unspent CSR amount

Any unspent CSR amount shall be dealt with in accordance with Section 135(5) and Section 135(6) of the Companies Act, 2013 and the applicable Rules as amended from time to time.

15. CSR surplus

Any surplus arising out of CSR activities shall not form part of the business profits of the Company and shall be utilized in accordance with the CSR Rules.

16. Impact assessment

Where applicable under the CSR Rules, the Company shall undertake impact assessment of CSR projects through independent agencies and place the findings before the Board.

17. Monitoring mechanism

The CSR Committee shall establish a robust monitoring framework to ensure:

- Effective implementation of projects.
- Proper utilization of funds.
- Achievement of intended objectives.
- Periodic review of progress.
- Compliance with statutory requirements.

18. Disclosures

The Company shall make disclosures as required under:

- Companies Act, 2013.
- Companies (CSR Policy) Rules, 2014.
- SEBI (LODR) Regulations, 2015.
- Applicable MCA Circulars and Notifications.

The CSR Policy, composition of CSR Committee and approved CSR projects shall be displayed on the Company's website.

19. Exclusions

The following shall not qualify as CSR activities:

- Activities undertaken in the normal course of business (except where specifically permitted).
- Activities benefiting only employees of the Company and their families.
- Political contributions.
- Activities undertaken outside India except as permitted by law.
- Sponsorship activities for deriving marketing benefits.
- Activities undertaken for fulfillment of statutory obligations.

20. Amendment

The Board of Directors may amend, modify or revise this Policy from time to time based on recommendations of the CSR Committee and in accordance with amendments to the Companies Act, 2013, CSR Rules, SEBI Regulations and other applicable laws.

21. Effective date

This Policy shall come into effect from the date of approval by the Board of Directors and shall remain in force until modified or replaced by the Board.

Approved by the Board of Directors of Thakkers Group Limited

Date: 01-10-2026
Place: Nashik