



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Preamble

We, at Lava International Ltd., believe that our business is co-extensively associated to society at large as being in the business of telecommunication devices, we are catering the need and demand of common man by providing a media for communication at social level, business level etc. In other sense we can say our business is built around strong social relevance by supporting the common man in meeting their needs. We believe that providing satisfactory need of common man is as important as wealth creation for our shareholders. As a responsible human organization and a part of the society, we are committed to serve the society and to contribute for the welfare of the Society. In line with the regulatory expectations, a formal policy is being laid down as a guide towards our social commitment going forward.

Important words & meanings

Act- means the Companies Act, 2013 as amended from time to time

CSR- mean Corporate Social Responsibility

CSR Policy – means the policy approved by the board as the Corporate Social Responsibility policy of the company as amended from time to time.

CSR Rules or Rules – means Companies (Corporate Social Responsibility Policy) Rules 2014

Policy Objectives

The objective of the CSR Policy (“Policy”) is to lay down the guiding principles in undertaking various programs and projects by or on behalf of the company relating to Corporate Social Responsibility (“CSR”) within the meaning of section 135 of the Companies Act, 2013 read with Schedule VII of the Act and the CSR Policy Rules 2014.(“Rules”)

Applicability

The policy shall be applicable to all CSR activities of the company whether carried by it or through any implementation agency and shall come into effect on its approval by Board of Directors.

CSR Committee

CSR Committee means the committee of the board constituted in terms of Section 135 of the Companies Act, 2013 read with Rule 5 of the rules.

Role of the Committee include

- i) Draft the CSR policy and recommend the same to the Board for approval.
- ii) Review and recommend any new CSR initiatives to be taken up by the company including the selection/appointment of implementation agencies.
- iii) Review the progress of CSR projects already undertaken by the company and the utilization of budgets for each such projects.
- iv) Review and recommend the CSR report to be included in the board's report.
- v) Review and recommend any amendments to be made in the CSR policy of the Company.
- vi) To carry such other functions as may be delegated to it by the board relating to CSR activities of the company.

CSR Activities

Company is already undertaking part in the society related programs by way of contribution to religious functions, awareness on Electronic Wastes by various modes, running cleanliness drive in office surrounding area etc. The company formally adopt to undertake / fund project, programs or activities and also undertake such other activities as may be approved by the board as is falling under schedule VII of the Act 2013 towards its commitment to CSR activities itself or through registered trust or registered society or a company established by the company or under section 8 of the Act or otherwise. :

The Company proposes to implement its CSR activities in various sectors stated hereunder:

Sectors in which CSR activity can be undertaken

- Healthcare
- Sanitation
- Drinking Water
- Education
- Rural Development
- Vocational Skills
- Entrepreneurship Skills
- Employment Opportunities
- Facilities for Senior Citizens
- Medical Aid
- Old Aged Homes
- Women Hostels

- Special Employment Opportunities for Women
- Environment Protection
- Animal Welfare
- Conservation of Natural Resources
- Protection of National Heritage
- Promoting and development of Art and Culture
- Public Libraries
- Promotion and development of traditional arts and handicrafts
- Measures for armed forced veterans, war widows and their dependents
- Promotion and development of rural sports and National Games
- Contribution to funds set by the Central or State Government for development and welfare of Scheduled Castes, Scheduled Tribes and minorities
- Rural Development Projects
- Contribution to technology incubators located within academic institutions
- Go Green Initiatives
- Human Rights
- Any other area as may be prescribed by Schedule VII amended from time to time

The Company will review the sectors from time to time and make additions/deletions /clarifications to the above sectors.

Effects of interpretations/clarifications and amendments on projects/ programs /activities

The objective of the policy is to act as a guideline for the company in its endeavor to undertake socially relevant activities. The policy shall be deemed to have amended or modified to the extent of any modification/ amendments or clarifications issued by the Central Government from time to time in relation to the CSR obligations of companies and shall be interpreted accordingly.

Execution of projects/programs

The company may undertake one or more projects or programs or activities provided in the policy either as its own or through any implementation agency. It shall be the endeavor of the company to build up necessary capabilities to implement the CSR projects on its own in the long run.

CSR Activities in Partnership

The company may undertake programs in collaboration with other companies only in cases where such programs are separately reportable in the CSR report of participating companies.



Monitoring of CSR Activities

CSR committee of the company will be responsible for the monitoring of various CSR projects or programs undertaken by the company directly or indirectly. The committee shall ensure that;

- i. Company undertakes the CSR activities as provided in the CSR policy
- ii. The projects/ programs are implemented as per the program approved by the board
- iii. The budget allocated for each of the project is utilized for the projects as per the approved plans.
- iv. The objective of the project/program is achieved as per the plans
- v. Wherever projects/programs are undertaken in partnership with one or more organizations, the part of the project or program undertaken by the company shall be distinguishable and necessary supporting documents in respect of the same shall be obtained from the other partners/implementing agency on an annual basis.

Company shall provide necessary resources and human capital for implementation and the effective monitoring of the CSR projects and programs as may be directed by the CSR committee. The services of any external agencies or persons who have experience in the same or similar projects or programs undertaken or proposed to be undertaken by the company may also be made available for successful implementation and monitoring of the project.

Surplus arising out of CSR

Surplus arising out of any CSR project or program or activities shall not form part of the business profit of the company.

Reporting

On approval of the CSR policy or any amendments thereof, the contents of the policy shall be included in the Boards' report and the same shall be displayed on the web site of the company. At the end of each financial year, the CSR committee shall prepare a report of the CSR program in the prescribed form relating to the financial year and submit to the board for its inclusion in the Board's report.

Review and Amendment

CSR Committee shall review its policy from time to time and make suitable changes as may be required and recommend the same to Board for its approval. Board pursuant to the recommendation of CSR Committee may amend the policy.

Lava CSR Annual Action Plan
FY 2025-26

1. CSR Purpose Statement

This Annual Action Plan of Lava International Limited is designed to enlist the approved CSR projects and their details in line with provisions of the Companies Act, 2013 (“Act”) and Companies (Corporate Social Responsibility Policy) Rules, 2014 (“CSR Rules”) including any statutory amendment or re-enactment thereon and in line with the CSR Policy of the Company.

2. Annual Action plan Details:

- a. **Financial Year** - 2025-26
- b. **No. of projects:** 2
 - i. CSR Activity 1: Apprentice Stipend under Apprentice Act 1961 (Over & Above-2.5% minimum threshold)
 - ii. CSR Activity 2: B.Voc Programme

Please refer below to Table 1 for further information.

- c. **Average net profit of the Company for last three financial years** – To be determined based on the audited financial statements for the FY 2024-25.
- d. **Prescribed CSR Expenditure (two per cent of the average net profit of the Company for last three financial years)** – To be determined based on the audited financial statements for the FY 2024-25.

TABLE 1

Sr. No.	Particulars	CSR Activity 1	CSR Activity 2
1.	CSR activity or projects or programmes that are approved to be undertaken	Payment of Stipend to the Apprentices under Apprentice Act, 1961	B.Voc Programme i.e. Providing On-the-Job-training (OJT) to the students in the same field in which he/she is doing the course wherein the theoretical learning comes from the classroom teaching provided by the Universities / Institutes and the practical learning from the OJT provided by Lava.
2.	Areas or subjects specified in Schedule VII of the Act	As per item no. (ii) of Schedule VII of the Companies Act 2013: <i>“promoting education, including special education</i>	As per item no. (ii) of Schedule VII of the Companies Act 2013: <i>“promoting education, including special</i>

		<i>and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects."</i>	<i>education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects."</i>
3.	The manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;	Directly	Through Implementing Agency - Grey Sim Learnings Foundation having CSR Registration No. CSR00000153
4.	The modalities of utilisation of funds and implementation schedules for the projects or programmes;	The Company's monthly payments to the Apprentices under Apprentice Act, 1961 which constitutes Apprentices engaged by the Company over & above 2.5% of the total manpower as a minimum threshold criteria but not exceeding 15% shall be considered as CSR funding of the Company in pursuance to the Office Memorandum issued by Ministry of Skill Development and Entrepreneurship having file no. MSDE-10(1)/2020-AP (PMU)/-Pt. on March 11, 2020.	Monthly Grants to be remitted to Grey Sim Learnings Foundation (GSLF) as part of its vocational programme namely B.Voc. The CSR project cost to be disbursed by way of monthly grants shall comprise of Sustenance Allowance and Project Implementation Charges @2.5%.
5.	Budget amount of CSR expenditure	As per Actuals	As per Actuals
6.	Monitoring and reporting mechanism for the projects or programmes; and	Not Applicable since this is a Direct CSR activity of the Company.	The Implementing Agency will be providing Utilisation certificate monthly.
7.	Details of need and impact assessment, if any, for the projects undertaken by the Company*	NA	NA

* Since the average CSR obligation in the three immediately preceding financial years is less than Rs. 10 Crores, the provisions relating to the impact assessment under sub rule 3 of Rule 8 are not applicable to the Company.

The aforesaid Annual Action Plan is recommended by the CSR Committee of the Board of Directors of the Company in its meeting held on 24th March 2025 and approved by the Board of Directors of the Company vide circular resolution dated _____. The Board may alter this plan at any time during the financial year, as may be recommended by the CSR Committee, if any, based on the reasonable justification for such alternation.