HARIKANTA OVERSEAS LIMITED.

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

OF HARIKANTA OVERSEAS LIMITED

(As per Section 135 of the Companies Act, 2013)

A. <u>Preamble</u>

HARIKANTA OVERSEAS LIMITED ("the Company") believes in conducting its business in a socially responsible, ethical, and sustainable manner. The Company recognizes its responsibility towards society and the environment and is committed to contributing to sustainable development.

This CSR Policy is framed in accordance with the provisions of Section 135 of the Companies Act, 2013 ("the Act") read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

The Board on 06th November, 2025 has adopted the Corporate Social Responsibility Policy.

B. Applicability

This Policy shall apply to all CSR activities undertaken by the Company in India as per Schedule VII of the Act.

Since the Company's CSR obligation is **less than ₹50 lakhs**, the Company is **not required to constitute a CSR Committee**, in accordance with the provisions of the Act. Accordingly, the functions of the CSR Committee shall be discharged by the **Board of Directors of the Company**.

C. CSR Objectives

The Company aims to:

- Contribute to support education
- Contribute to social and economic development
- Improve the quality of life of communities
- Promote environmental sustainability
- Support inclusive growth and equitable development

D. CSR Activities

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

- Eradicating hunger, poverty, and malnutrition
- Promoting education, including special education and vocational skills
- Promoting gender equality and empowering women

- Ensuring environmental sustainability and ecological balance
- Protection of national heritage, art, and culture
- Measures for the benefit of armed forces veterans and their dependents
- Rural development projects
- Disaster management, including relief and rehabilitation

The Board may modify or include additional activities as permitted under applicable laws.

E. CSR Budget

- The Company shall spend, in every financial year, at least **2% of the average net profits** made during the three immediately preceding financial years, in accordance with the Act.
- If the Company fails to spend such amount, the Board shall specify the reasons for not spending in its report and comply with the provisions relating to transfer of unspent amounts as prescribed under the Act.

F. Implementation of CSR Activities

CSR activities may be implemented by the Company through:

- Direct implementation by the Company; or
- Registered trusts, societies, or Section 8 companies having established track records; or
- Any other eligible entity as permitted under the Act.

G. Monitoring and Reporting

- The Board of Directors shall monitor the implementation of CSR activities.
- The Company shall ensure proper documentation and reporting of CSR initiatives.
- An annual report on CSR activities shall be included in the Board's Report as per statutory requirements.

H. Surplus Arising Out of CSR Activities

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

I. Amendment to the Policy

The Board of Directors may amend this CSR Policy from time to time to ensure compliance with statutory requirements or based on business needs.

J. General

In case of any inconsistency between this Policy and the applicable laws, the provisions of the law shall prevail.

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