

LUKE COUTINHO HOLISTIC HEALING SYSTEMS PRIVATE LIMITED

CIN: U74999MH2017PTC295581

Flat No. 902, 9th Floor, Le Papeyon Mount Mary, Bandra (West), Mumbai-400050

Tel No.: 9820682577---E-mail ID: accounts@lukecoutinho.com

CORPORATE SOCIAL RESPONSIBILITY POLICY

I. CSR POLICY

This CSR Policy encompasses Luke Coutinho Holistic Healing Private Limited's philosophy for social responsibilities and lays down the guidelines and mechanism for undertaking projects, programs and activities towards such responsibilities.

II. VISION STATEMENT AND OBJECTIVE

1. The CSR Policy sets out Luke Coutinho Holistic Healing Private Limited's commitment towards ensuring that our activities extend beyond business and include initiatives and endeavors for the benefit and development of the community and society. The CSR Policy lays down guidelines for undertaking programmes geared towards social welfare activities or initiatives. Through this CSR Policy, we propose to adopt the CSR Activities mentioned below.
2. In alignment with the above vision, our company, through the CSR Activities, will endeavor to enhance value creation in the society and in the community, through its services, conduct and initiatives, so as to promote sustained growth for the society and community, in fulfilment of its role as a socially responsible corporate.
3. This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act 2013 and the rules issued thereunder.
4. The objective of this CSR Policy is to:
 - (i) Outline projects, programs and activities to be undertaken by Luke Coutinho Holistic Healing Private Limited;
 - (ii) Specify the modalities of execution of such projects, programs and activities;
 - (iii) Monitor the process to be followed for such projects, programs and activities;
 - (iv) Directly or indirectly take up programs that benefit the communities in and around its work centers and results, over a period of time, in enhancing the quality of life and economic well-being of the local populace; and
 - (v) Generate community goodwill for Luke Coutinho Holistic Healing Private Limited and help reinforce a positive and socially responsible image, through our CSR Activities.

III. CSR COMMITTEE

1. The CSR Committee has been constituted in accordance with the provisions of the Act comprising of the 2 Directors, Mr. Luke Coutinho and Ms. Natashya Phillips. The CSR Committee may invite other experts/ invitees as per its requirements.
2. The CSR Committee shall be responsible for:

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- (i) Formulating the CSR Policy, including the CSR Activities and their budgets as well as recommendation of any subsequent change/ modification to the CSR Policy;
- (ii) Institute an implementation and monitoring mechanism for CSR Activities;
- (iii) Periodically updating the Board on the progress being made in the planned CSR Activities;
- (iv) Providing a responsibility statement in the Board's report.

IV. PROJECTS, PROGRAMS AND ACTIVITIES

1. Luke Coutinho Holistic Healing Private Limited has identified the following focus areas of intervention as follows
 - (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including supporting Hospitals for improving Cancer Care and Treatment .
 - (ii) Promoting education, including special education and employment enhancing vocation skills especially among children including sports activities.
 - (iii) 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.
 - (iv) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports
 - (v) Contribution to the prime minister's national relief fund or any other fund set up by the centralgovt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women.
2. The criteria for selecting areas where the CSR Activities will be carried will, *inter-alia*, comprise of the following:
 - (i) First choice will be to identify schools/institutions from the list of schools shared by the Ministry of Human Resource Development, Government of India.
 - (ii) Readiness on the part of the school/institutions to give their full support to achieve the set objectives.
3. The Board shall ensure that appropriate designated staff or personnel provides adequate assistance (viz. data collection, survey, quotations and costs involved etc.) to the CSR Committee to enable it to make necessary recommendations to the Board. For this purpose, the CSR Committee may also approach external consultants for necessary assistance as it may deem fit at such costs as may be approved by the Board.

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4. Activities undertaken in pursuance of the normal course of Luke Coutinho Holistic Healing Private Limited's business shall not be considered towards CSR Expenditure.

V. CSR EXPENDITURE AND ALLOCATION

The CSR spend by qualifying Luke Coutinho Holistic Healing Private Limited entities for the financial year 2020-21 shall be as per the requirements of the Companies Act 2013. The entities may in compliance with the provisions of the Act and the CSR Rules, including notifications and clarifications issued thereunder receive funds from its parent company for the CSR Expenditure.

The Board shall approve the allocation of the CSR Expenditure on the CSR Activities and, to the extent possible, shall give priority to the local areas wherever Luke Coutinho Holistic Healing Private Limited has its operations.

VI IMPLEMENTATION

Vehicle for implementation

We may undertake the CSR Activities either ourselves or through other qualifying Non-government organizations (“NGOs”) or agencies. The projects, programs or activities identified by the CSR Committee and approved by the Board shall be implemented in a project mode. Suitable documents / agreements shall be entered into with NGOs and the other agencies for the purposes of implementation of the CSR Activity, in case the CSR Activity is proposed to be implemented through the third party agencies. The conditions of grant of amounts for all CSR Activities and the break-up of the allocations shall be set out and evaluated from time to time.

5. To the extent feasible, a project based accountability approach to stress on the long term sustainability of CSR Activities shall be adopted, and the indicative action plan and implementation schedule (timelines) for the projects, programs and activities shall be adopted.

VIII MONITORING MECHANISM

1. To ensure effective implementation of the CSR projects, programmes and activities undertaken in terms of this CSR Policy, the progress of each such project, programme and activity will be reported by the CSR Committee on a quarterly basis, with all requisite documentation to Board.

IX. REPORTING

1. The CSR Committee shall maintain proper minutes of all its meetings.
2. The CSR Committee shall prepare an annual report on CSR with such information and particulars as may be required by the Act and such report shall be included in the Board's report annexed to the financial statements.
3. The Board's report shall include an annual report on CSR containing such details as may be prescribed from time to time under the Act and the CSR Rules.
4. The Board will be responsible to ensure that the statutory requirements as may be prescribed from time to time under the Act and the CSR Rules are complied with.

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X. GENERAL

1. Any surplus arising out of the CSR projects/programs or activities shall not form part of the business profits of the qualifying Luke Coutinho Holistic Healing Private Limited company.
2. All administrative expenses, including expenditure on wages and salaries, tours and travels, and training and development of personnel deputed on CSR Activities would be borne from CSR funds.
3. If it is observed that any CSR Activity taken up for implementation is found not properly implemented, the CSR Committee may, with approval of the Board, may discontinue funding the project at any time during the course of implementation and use such funds for any other project.

XII AMENDMENT

The CSR Committee is empowered to amend or modify the CSR Policy and such changes shall be placed before the Board for its approval. The Board may subject to compliance with applicable law, at any time approve or alter, amend or modify the CSR Policy, as it deems fit to comply with the statutory obligation to undertake the CSR Activities.