

PLATINO AUTOMOTIVE PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

V.1: Approved by Board of Directors on November 05, 2025

OBJECTS:

Corporate Social Responsibility (“**CSR**”) is the commitment of companies to provide resources and support activities focussed on enhancing economic and social development. It is the effort made by companies to improve the living conditions of the local area in which they operate and the society at large.

The aim of the Corporate Social Responsibility Policy (CSR Policy) is to ensure that the Platino Automotive Private Limited (“**Company**”) becomes a socially responsible corporate entity committed to improving the quality of life of the society at large.

As a responsible corporate entity, Company shall consistently strive to meet the expectations of the society by supporting initiatives for improving infrastructure/ quality of life of society/ community without compromising on ecological issues on sustainable basis.

SCOPE OF CORPORATE SOCIAL RESPONSIBILITY POLICY:

The policy would pertain to all activities undertaken by Company towards fulfilling its corporate social responsibility objectives. The policy would also ensure compliance with Section 135 of the Companies Act, 2013 (the “**Companies Act**”) and the rules framed thereunder (“**CSR Rules**”).

CSR ACTIVITIES:

“**Corporate Social Responsibility**” (CSR) means the activities undertaken by the Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in the Schedule VII of the Companies Act and CSR Rules, but **shall not include** the following, namely:

- (i) activities undertaken in pursuance of normal course of business of the Company.
- (ii) any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level.
- (iii) contribution of any amount directly or indirectly to any political party under section 182 of the Act.
- (iv) activities benefitting employees of the Company as defined in clause (k) of Section 2 of the Code on Wages, 2019 (29 of 2019).
- (v) activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services.
- (vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India.

The projects or programmes to be undertaken by Company as CSR in India will be considered and approved by the Board of Directors of the Company. Any project or programme that is exclusively for the benefit of Company’s employees would not be considered as CSR.

Company's primary focus areas for CSR activities are as recommended by the CSR committee and approved by the Board as per the areas specified under schedule VII of the Companies Act, 2013.

GOVERNANCE:

The CSR Committee shall formulate the policy, define the scope of CSR activities for Company and ensure compliance with the Policy while implantation of CSR projects or activities.

The CSR Committee shall be constituted as per provisions of Section 135 of the Companies Act, 2013 and rules made thereunder. The CSR Committee shall at all time act in a manner that is consistent with the provisions contained in this Policy and CSR rules.

(a) The CSR Committee shall:

- (i) Formulate the Policy and recommend to the Board and any amendments thereto;
- (ii) Indicate the CSR activities to be undertaken by Company as in areas or subject as specified in Schedule VII of the Companies Act;
- (iii) Review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the Company, and the annual CSR action plan to the Board;
- (iv) Formulate and recommend the Annual Action Plan in pursuance to the CSR Policy to the Board;
- (v) Monitor the CSR activities and its compliance with the Policy from time to time; and
- (vi) Review and implement, if required, any other matter related to CSR initiatives.

(b) The Board shall:

- (i) Approve the Policy based on the recommendation of the CSR Committee;
- (ii) Approve the CSR activities and annual CSR action plan based on the recommendation of the CSR Committee; and
- (iii) Review the Policy and CSR activities.

PROJECT SELECTION AND IMPLEMENTATION:

CSR activities will be undertaken in areas identified by the CSR Committee or Board of Directors. An annual action plan shall be recommended by CSR Committee, if any, and approved by the Board. Based on recommendations of the Committee, if any, Board of Directors shall approve the projects.

The Committee shall ensure that the CSR activities are undertaken by the company itself or through-

- (a) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company; or

- (b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- (c) any entity established under an Act of Parliament or a State legislature; or
- (d) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

A company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with these rules.

REPORTING AND MONITORING:

1. The Board of the Company or its CSR Committee shall monitor the implementation of the CSR projects as required under the Companies Act 2013 and examine whether the funds provided by the Company are utilized in accordance with the approved plans and report to the Board of Directors or its committee. The management shall provide a detailed report of CSR activities carried out as well as budgets utilized in the prescribed format to the Company's Board or its committee.
2. In case of ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible period.
3. If for any reason, the Company is unable to utilize the entire funds provided by the Company, such unutilized funds shall be treated in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as may be amended from time to time.
4. The Board of the Company shall:
 - i. alter the Annual Action Plan at any time during the financial year, as per the recommendation of its CSR Committee, if any, based on the reasonable justification to that effect.
 - ii. ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.
 - iii. pass a resolution for setting off the CSR amount spent in excess of requirement provided under sub-section (5) of section 135, against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years.
 - iv. make disclosures in the Board's Report as required under Rule 8 of the CSR Rules.
 - v. undertake impact assessment as required under Rule 8 of the CSR Rules and take note of the impact assessment reports which are mandatorily required to be placed before it; and
 - vi. mandatorily disclose the composition of the CSR Committee, if any, and CSR Policy and Projects approved by the Board on website of the Company for public access.

EFFECTIVE DATE:

The Policy shall be effective from the date of approval of the Board of Directors of the Company. The Policy may be reviewed and amended from time to time by the Board based on the recommendation of the CSR Committee.