Le Passage to India

CORPORATE SOCIAL RESPONSIBILITY POLICY

LE PASSAGE TO INDIA TOURS AND TRAVELS PRIVATE LIMITED

Le Passage to India Tours and Travels Private Limited, a subsidiary of foreign company defined under the Company's Act 2013, is required to frame CSR policy as under:

1. PURPOSE

This policy aims to contribute towards sustainable development of the society and environment to make planet a better place for future generations. The philosophy of CSR is imbibed in our business activities and social initiatives taken in the area of education, social and cultural welfare, tourism etc.

This policy is applicable to Le Passage to India Tours and Travels Private Limited.

2. OBJECTIVE OF THE POLICY

The main objective of the CSR Policy intends to:

- Ensure an increased commitment at all levels in the organisation, to operate its business in an economically, socially & environmentally sustainable manner, while recognising the interests of its stakeholders;
- Strive for economic development that positively impacts the society at large with minimal resource footprints.

3. COMPOSITION OF CSR COMMITTEE

The CSR Committee of Le Passage to India Tours and Travels Private Limited shall be composed of at least two members of the Board of Directors. Members of the CSR Committee may be replaced by any other member of the Board.

Le Passage to India

A. RESPONSIBILITIES OF CSR COMMITTEE

The CSR Committee shall meet as often as its members deem necessary to perform the duties and responsibilities, but not less than once in a year.

Responsibilities of CSR committee includes:

Formulating and recommending to the Board of Directors the CSR policy and indicating activities to be undertaken specified in Schedule VII to the Act;

The CSR Committee will carry out the following functions:

- To compute and earmark funds for CSR activities taking into account net worth, turnover, or the average net profit for the past 3 years. 2% (Two percent) of the average net profit for the previous three years is to be earmarked for CSR activities.
- Recommending the budget and managing the expenditure on CSR activities;
- To release yearly donations in appropriate number of installments.
- To formulate and recommend an annual action plan in pursuance of CSR Policy covering the following aspects:

  (i) the list of approved CSR projects or programs to be undertaken in areas or subjects specified in Schedule VII to the Act;

  (ii) the manner of execution of such projects or programs as specified in rule 4(1) of CSR Rules;

  (iii) the modalities of utilisation of funds and implementation schedules for the projects or programs;

  (iv) monitoring and reporting mechanism for the projects or programs; and

  (v) details of need and impact assessment, if any, for the projects undertaken by the company;

  (vi) Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect.

- To monitor the CSR Policy as approved by the Board from time to time. The CSR Committee should recommend the approach and direction of CSR activities to be undertaken by the company and also provide Guiding principles for -

  (i) Selection of CSR projects / programmes / activities

Le Passage to India

(ii) Implementation of CSR projects / programmes / activities

B. RESPONSIBILITIES OF THE BOARD

- Approve the CSR Policy, annual action plan and the CSR Expenditure after taking into consideration the recommendations made by the CSR committee;
- Ensure the yearly CSR spending is as per and in accordance with relevant provisions of the Companies Act, 2013;
- Ensure that CSR activities included in the CSR Policy are undertaken by the Company and that such activities are related to the activities specified in the Companies Act, 2013; Board may alter such plan based on reasonable justification as per recommendation of CSR committee.
- In case of on-going project - monitor the implementation of the project with reference to the approved timelines and year-wise allocation.
- Board approval is required when -

  (a) Company spent in excess

  (b) Company wants to set off said excess amount
- Chief Financial Officer or the person responsible for financial management shall certify to the Board about utilization of funds disbursed for the purposes and manner approved by the Board.
- Board of Directors Report to include:
  - Contents of the CSR Policy and Composition of the CSR committee;
  - An annual report on the CSR in the format prescribed by the Ministry of Corporate Affairs;
  - Reasons for failure (if any) to spend required amount on CSR activities.
- Any or all provisions of this CSR policy may be amended by the Board based on the recommendations of the CSR Committee or in accordance with any statutory guidelines that may be issued from time to time.

Le Passage to India

4. FOCUS AREA/CSR ACTIVITIES

In accordance with the requirements under the Companies Act 2013, Le Passage to India Tours and Travels Private Limited activities, amongst others, will focus on:

- promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- Protection of National heritage, art, and culture
- Any other activity as mentioned in Schedule VII of the Companies Act, 2013

5. CSR MONITORING & REPORTING

The yearly donations shall be paid in appropriate installments.

The CSR committee members may visit the project site at irregular intervals to ensure: -

A. Children present against the children registered within the Project. Need to validate count and child details on a random basis.

B. Number of teachers present against paid for the project.

C. Course content of each class.

D. Classroom facilities and teaching aids.

E. Progress reports of children.

F. Extracurricular activities conducted during the period since last visit.

G. Feedback from children or parents.

H. Other general monitoring activities of any nature as required from time to time, for the activities as recommended by the CSR committee, to ensure the effective implementation and progress of CSR initiatives.

I. The annual report on CSR activities, as per attached annexure, is to be included in the balance sheet filed under section 381 of company act.

6. CSR BUDGET

In a financial year, the company shall spend on CSR Activities, as per and in accordance with the relevant provisions of the Companies Act, 2013. The company shall allocate a budget towards each of the CSR activities falling within the purview of the objectives of this CSR Policy. The CSR expenditure shall include all actual expenditures including contribution to corpus or on project or programs relating to CSR activities recommended by the CSR Committee and approved by the Board of Directors.

Whole time director/Managing Director shall monitor the utilization of funds for the purposes set forth and certify to this effect.

Unspent CSR amount, if any, shall be transferred to separate account in accordance with the applicable CSR Rules from time to time.

7. ANNUAL ACTION PLAN

The CSR Committee shall formulate and recommend to the Board, an annual action plan which shall include the following:

(a) the list of CSR projects or programmes that are approved and to be undertaken by the company;

(b) the manner of execution of such projects or programmes;

(c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;

(d) monitoring and reporting mechanism for the projects or programmes; and

(e) details of need and impact assessment, if any, for the projects undertaken by the company.

8. NEED AND ASSESSMENT

Le Passage to India

CSR activities undertaken should be in the interest of the society and the local population where the company operates. Before undertaking any project or activities the company shall conduct need assessment for the project and its utility in the demography where project is proposed.

9. CAPITAL ASSETS

Capital asset acquired or created by CSR projects should be held by the beneficiaries of the said CSR project or a trust or a public authority for the benefits of all. The company should take appropriate measure to ensure that such assets are utilized for the purpose it was meant for and should not be transferred or disposed off without prior permission of the company.

10. GENERAL

a. Any surpluses arising out of the CSR activity would not be a part of business profits of the company;
b. Any or all provisions of the CSR Policy would be subject to revision/amendment.

11. EXCEPTIONS & VIOLATIONS

Any exceptions or violations of this policy need to be brought to the notice of Policy Owner for appropriate action.

*****

Le Passage to India Tours & Travels Pvt. Ltd. Le Passage to India

Date : 05/03/2025