

CORPORATE SOCIAL RESPONSIBILITY POLICY
ATLAS ELEKTRONIK INDIA PRIVATE LIMITED

1. INTRODUCTION

ATLAS ELEKTRONIK India Private Limited (hereinafter referred to as “the Company” or “ATLAS ELEKTRONIK India”), was incorporated on 2nd March 2013 as a private limited company under its present name.

ATLAS ELEKTRONIK India is a wholly owned subsidiary of the ATLAS Group. ATLAS ELEKTRONIK GmbH (hereinafter referred as the ‘parent company’) is the flagship company of the ATLAS Group.

The ATLAS Group specializes in maritime high technology. It supplies sonar sensors, combat management and communication systems for submarines and surface vessels, through UxV’s, torpedoes as well as coastal security systems, including system integration, right up to comprehensive and reliable services with logistics life time support

The Company is committed to implement the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014. Accordingly, the Company has set up a CSR Committee and a CSR Policy. This policy shall be known as Corporate Social Responsibility Policy of the Company and is referred hereinafter as “the Policy” or “CSR Policy”.

2. CSR COMMITTEE

The Company has, as per the requirements of Section 135 of the Companies Act, 2013 and rules related thereto, formed a committee to manage its CSR activities (hereinafter referred to as the “CSR Committee”) consisting of three directors of the Company, as under-

Mr. Khalil Arthur Rahman (Director)

Mr. Gavin Mennecke Jappy (Director)

Mr. Ralf Behringer (Director)

The quorum of the Committee Meeting will be at-least one-third of its total strength or two members, whichever is higher.

3. CSR ACTIVITIES

The Company will carry out/undertake any one of the following CSR activities on its own or in association with others or may make contribution towards specified funds as given below:

- a) Ensuring environmental sustainability by conserving natural resources;
- b) Promoting education including special education and employment enhancing vocation skills ;
- c) Promoting preventive health care and sanitation;
- d) Providing housing facilities for underprivileged people;
- e) Promoting community development by way of setting up old age homes, day care centers, homes and hostels for women and orphans, etc.
- f) Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief, and funds for the welfare of the Scheduled Castes, Scheduled Tribes, other backward classes, minorities and women or any other fund as may be recognized from time to time for the purpose of qualifying as CSR expenditure.
- g) Contribution to Swach Bharat Kosh set up by the Central Government for promotion of sanitation.
- h) Contribution to Clean Ganga Fund set-up by the Central Government.
- i) Such other activities included in Schedule VII of the Companies Act, 2013 as may be identified by the CSR Committee from time to time.

4. CSR EXPENDITURE AND BUDGET

CSR expenditure and budget for each year will be approved annually by the CSR Committee.

Expenses incurred by the Company for the fulfilment of any other Act/ Statute of regulations would not count as CSR expenditure under the Companies Act, 2013.

Further, salaries paid by the Company to regular CSR employees as well as to volunteers of the Company will be factored into CSR project cost as part of the CSR expenditure.

The surplus arising out of the CSR activities shall not form part of the business profit of the Company.

5. MONITORING PROCESS

There shall be an annual approval by the CSR Committee of the CSR-related activities that are to be undertaken by the Company. The members of the CSR committee will monitor the activities to verify the progress of the activities as against the original proposal.

The CSR Committee will hold an annual meeting for an update to consider the utilisation of funds and the progress of the projects.

6. INFORMATION

The contents of this CSR Policy are also available on the website of the Company:
www.india.atlas-elektronik.com

7. REVIEW

This CSR Policy will be reviewed from time to time by the CSR Committee to update and to comply with the applicable laws.

A handwritten signature in blue ink, appearing to read 'Amit A. Sharma', followed by a period.