



**MITSUBISHI ELEVATOR INDIA PRIVATE LIMITED**

**CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY**

<b>Formulated by CSR Committee</b>	<b>Reviewed by CSR Committee</b>	<b>Approved by Board</b>
On 27 <sup>th</sup> March 2015	27 <sup>th</sup> March 2015	28 <sup>th</sup> March 2015
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<b>CONTENTS</b>		
<b>Sl. No.</b>	<b>Topics</b>	<b>Page No.</b>
1	Preamble	3
2	Objective	3
3	Composition of CSR Committee	3
4	Meetings and Quorum	3
5	Duties & Responsibilities of the CSR Committee	3
6	Responsibilities of the Board	4
7	CSR Expenditure	4
8	CSR Activities	5
9	CSR Implementation Team	5
10	Implementation of CSR Activities	6
11	Procedure for Review and approval of CSR proposals	6
12	Enhancing CSR Team capabilities	7
13	CSR Unspent Amount	7
14	Excess CSR Amount Spent	7
15	Reporting of CSR	7
16	Website Display	7
17	Review and Audit	7
18	Amendments	8
19	Annexure-1 (List of prescribed CSR Activities)	9
20	Annexure-2 (Format for annual report on CSR activities)	11
21	Annexure-3 (CSR Implementation Team Members)	13

### 1. Preamble

Corporate Social Responsibility (CSR) is the affirmation that the company is committed to its stakeholders to conduct its business operations in an economically, socially and environmentally sustainable manner that is transparent and ethical.

The Corporate Social Responsibility Policy of Mitsubishi Elevator India Private Limited is formulated in accordance with the provisions of section 135 of the Companies Act 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014.

### 2. Objective

- a) To deliver superior and sustainable value to the Society with long term vision.
- b) To deliver and enhance - Social, Environmental and Economic Value to the Society.
- c) To Institute a process and a suitable mechanism for the implementation and monitoring of the CSR activities.

### 3. Composition of CSR Committee

As per section 135 of the Companies Act 2013; the CSR Committee shall consist of minimum two directors.

### 4. Meetings and Quorum

The CSR Committee shall meet at least twice in a financial year and the quorum for the meeting shall be minimum of two.

The Company Secretary shall play the role of Secretary to the Committee and assist the Committee in convening the meetings and recording the proceedings.

### 5. Duties & Responsibilities of the CSR Committee

The Duties and Responsibilities of the CSR Committee are to

- a) Formulate this CSR Policy and recommend to the Board for approval
- b) Suggest the relevant CSR activities to be carried out
- c) Recommend the amount of CSR Expenditure to be incurred
- d) Institute a transparent mechanism for implementation of CSR activities and control the same effectively.
- e) Ascertain the effectiveness of the programme through surveys as may be required.
- f) Prepare and submit an Annual Report to the Board on the CSR activities in a specified format **Annexure – II**
- g) Formulate and recommend to the Board for approval, an annual action plan in pursuance of this CSR policy which shall contain all matters which are required under

Applicable Law and any other matters as the CSR Committee may deem fit from time to time.

- h) Any other matter as the CSR Committee may deem appropriate for approval of the Board or as may be directed by the Board from time to time.

## **6. Responsibilities of the Board**

The Board will have the following responsibilities:

- a) Formally approve the CSR Policy and the expenditure proposed on the CSR activities by the CSR Committee.
- b) Confirm that such activities fall under the specification of the schedule VII. (Annex I).
- c) Ensure that at least 2% of average net profit made during the last 3 financial years or such minimum budget as may be statutorily mandated under the law shall be spent on the CSR activities.
- d) Assure that the contents of the CSR policy, CSR Committee and its activities shall be promptly displayed in the website.
- e) Ensure that an annual report on CSR activities shall be included in the Directors' Report every year in the prescribed format. (Annex II)
- f) Ensuring that administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.
- g) The Board shall undertake CSR activities directly or through a Trust or in association with any other society or authorized arrangement which are registered as implementing agency with the Central Government or as may be directed by the authority from time to time.

## **7. CSR Expenditure**

The norms for CSR Expenditure shall be as detailed below and subject to change as may be directed by the government from time to time.

- a) To spend at least 2% of the average net profits declared in the company profit and loss statement in the immediately preceding 3 financial years or such minimum budget as may be statutorily mandated under the law.
- b) Shall not qualify if spent on projects other than those specified in the schedule VII of Companies Act, 2013.
- c) The surplus arising out of CSR activities shall not be construed as business profit. Such surplus shall be spent towards CSR activities as directed by government from time to time.

- d) The employees or affiliates can also contribute and the same can be utilized in the CSR activities. Such contribution is treated as in addition to (a) above.

**8. CSR Activities**

Our CSR policy proposes to carry out related activities chosen from Schedule VII to the Companies Act, 2013, Refer- **Annexure I**.

**9. CSR Implementation Team**

- a) “**CSR Implementation Team**” is constituted with an objective to identify and implement the CSR activities of the Company successfully.
- b) The members of the “CSR Implementation Team” may be selected from each department/ IMEC Offices in order to have consensus among the departments/ IMEC Offices on identifying and implementing the CSR activities of the Company.
- c) The “CSR Implementation Team” would comprise of following Section of Company:

**Window person**

Company Secretary

**Supporting Members Representing IMEC Offices, multiple departments of Corporate and Factory**

Representatives from above department/ IMEC Offices are not limited including window person. Other department(s) may be added or changed based on the request.

Individual Names of representative from each department/ IMEC Office shall be mentioned in the Annexure-III of this Policy.”

- d) The “CSR Implementation Team” shall report to the CSR Committee members periodically.
- e) It shall do preliminary study in identifying and implementing the CSR activities of the Company.
- f) It shall submit the proposal of CSR activities to the CSR Committee. CSR Committee will recommend to the Board for approval.
- g) Upon approval of the Board, it shall implement the CSR activities of the Company and report to the CSR Committee the progress of the CSR activities.
- h) It shall meet at regular intervals as and when required and report to the CSR Committee the minutes of its meeting.

**10. Implementation of CSR Activities:**

- a) The implementation of CSR activities shall be carried out by the “CSR Implementation Team” authorized by the Board of Directors.
- b) The Company shall undertake the CSR activities directly and / or also through NGO’s, Non-Profit Organizations, etc. however, such Entities shall have an established positive track record as prescribed under law and are registered with the Central Government as CSR Implementing Agency or as may be directed by the authority from time to time.
- c) Involvement of the employees in the CSR activities will be encouraged for realizing their full potential and making them as responsible citizens.
- d) Such initiatives undertaken may be communicated through awareness campaigns and other appropriate tools to attract maximum employee participation.
- e) The following activities **DO NOT** qualify as CSR activity:
  - Any activity other than those specified in the schedule VII.
  - Activity done in the normal course of business.
  - Any activity benefitting only the employees of the Company and their families.
  - Contribution to any political party directly or indirectly.
  - 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.
  - Activities carried out for fulfilment of any other statutory obligations under any law in force in India.
  - Any activity supported by the company on sponsorship basis for deriving marketing benefits for its products or services.
- f) All the CSR activities as introduced by any Region or Corporate/ Factory office through CSR Implementation Team, which shall be undertaken with support of NGO’s or Non-Profit Organisation or directly etc, as per clause (b) above, shall mandatorily adhere to the Anti-Bribery Rules of the Company as per Article No. 7 of the Anti-Bribery Rules by filing necessary forms for approval under the said rules.

**11. Procedure for review and approval of CSR proposals**

- a) The CSR Implementation Team shall review and consolidate all the CSR proposals identified by Regions/ Corporate/ Factory.
- b) The CSR Implementation Team shall do due diligence of the proposals and present them before the CSR Committee.
- c) The CSR Committee shall review and recommend to the Board for approval of the proposals based on the merits.

- d) After approval of the Board, the CSR Implementation Team shall carry out the implementation of approved CSR activities.

**12. Enhancing CSR Team Capabilities**

An amount not exceeding 5% of the total CSR expenditure may be spent through any institution with established track record for enhancing the skills and capabilities of the Company employees in implementing the CSR activities.

**13. CSR unspent amount:**

If a company spends less than the amount required to be spent under their CSR obligation, the Board shall specify the reasons for not spending in the Board's report and shall deal with the unspent amount in the following manner:

<b>Nature of unspent amount</b>	<b>Action Required</b>	<b>Timelines</b>
Unspent amount pertains to 'Ongoing projects'	Transfer such unspent amount to a separate bank account of the company to be called as 'Mitsubishi Elevator Inda Pvt Ltd Unspent CSR Account FY 20XX-20XX'.	Within 30 days from the end of the financial year.
Unspent amount pertains to Other than 'Ongoing projects'	Transfer unspent amount to any fund included in Schedule VII of the Act.	Within 6 months from the end of the financial year.

**14. Excess CSR amount spent:**

In any financial year, where the Company has spent in excess of its CSR obligation, such excess spending shall be available for set off against the Company's CSR obligations for up to the next three financial years in accordance with Applicable Law, and the Board shall be competent to pass a resolution in this regard.

**15. Reporting of CSR**

Details of CSR activities undertaken in every financial year shall be entered in a format (**Annexure II**) and included in the Annual Report. The Board Report will contain a responsibility statement from the CSR Committee on the implementation, monitoring and compliance of the CSR objectives of the Company.

**16. Website Display**

The Company shall display through a link in its website ([www.mitsubishielevator.in](http://www.mitsubishielevator.in)) the contents of its CSR policy, CSR Committee Composition, CSR approved projects and all relevant information as may be required. The web link should also be updated regularly.

**17. Review and Audit**

- a) The CSR Committee shall be subject to appraisal. The policy contents and implementation progress shall be monitored.

- b) The Company through internal controls, monitoring and evaluation systems – shall implement, assess, document and report the impact of its CSR activities as may be applicable.
- c) Records relating to CSR activities and its expenditure shall be meticulously maintained and shall be submitted for reporting and auditing purposes.
- d) The implementing agencies other than the Company, if any involved, shall also be subjected to financial audit.
- e) The Company may appoint independent external consultants for carrying out such audits.

### **18. Amendments**

CSR policies of the Company may be reviewed and amended from time to time within the purview of Government directives.

**Place: Bangalore**  
**Date: 11<sup>th</sup> March, 2026**



**YOSHITAKA ASABA**  
**MANAGING DIRECTOR**  
**DIN: 10598194**

**ANNEXURE - I**

**CSR Activities Listed in Schedule VII of the Companies Act, 2013**

CSR shall focus on social, economic and environmental impact rather than mere output and outcome. Activities which are ad hoc and philanthropic in nature shall be avoided. Various activities that can be undertaken in general under CSR are outlined below:

1. Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare and sanitation (including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation) and making available safe drinking water;
2. Promoting education, including special education and employment enhancing vocation skills especially among children, woman, elderly and the differently abled and livelihood enhancement projects ;
3. 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;
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining of quality of soil, air and water (including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga);
5. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up of public libraries; promotion and development of traditional arts and handicrafts;
6. Measures for the benefit of armed forces veterans, war widows and their dependents (Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows);
7. Training to promote rural sports, nationally recognized sports, and Paralympics sports and Olympic sports;
8. Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
9. (a) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government or State Government, and  
  
(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defence Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of

Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

10. Rural development projects.
11. Slum area development
12. Disaster management, including relief, rehabilitation and reconstructive activities.
13. Any other activities as listed in Schedule VII of the Companies Act, 2013

**ANNEXURE - II**
**Format for the annual report on CSR activities to be included in the Board's Report**

(As per the CSR Rules, 2014)

1. A brief outline of the company's CSR policy, including overview of projects or programs proposed to be undertaken and a reference to the web-link to the CSR policy and projects or programs.
2. The Composition of the CSR Committee.
3. Provide the web-link(s) where composition of CSR Committee, CSR Policy and CSR projects approved by Board are disclosed on the website of the Company.
4. Provide the executive summary along with web-link(s) of Impact Assessment of CSR projects carried out, if applicable.
5. (a) Average net profit of the company for last three financial years:  
 (b) Prescribed CSR Expenditure (two per cent. Of the amount as in item (a) above).  
 (c) Surplus arising out of the CSR projects or programmes or activities of previous financial years  
 (d) Amount required to be setoff for the financial year, if any  
 (e) Total CSR obligation for the financial year [(b) + (c) - (d)]
6. (a) Details of CSR amount spent during the financial year (both Ongoing project and other than Ongoing project).  
 (b) Amount spent I Administrative Overheads  
 (c) Amount spent on Impact Assessment, if applicable  
 (d) Total amount spent for the financial year [(a) + (b) + (c)]  
 (e) CSR amount spent or unspent for the financial year:

Total amount spent for the Financial Year (in Rs.)	Amount Unspent (in Rs.)				
	Total amount transferred to Unspent CSR Account		Amount transferred to any fund specified under Schedule VII as may be required		
	Amount	Date of transfer	Name of the Fund	Amount	Date of transfer

(f) Excess amount for set-off if any:

S No	Particulars	Amount (in Rs.)
(1)	(2)	(3)
(i)	Two percent of average net profit of the Company	
(ii)	Total amount spent for the Financial Year	
(iii)	Excess spent for the Financial Year	
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous Financial Years, if any	
(v)	Amount available for set-off in succeeding Financial Year [(iii) – (iv)]	

7. Details of Unspent CSR amount for the preceding three Financial Years:

S N o	Precedin g Financial Year(s)	Amount transferre d to Unspent CSR Account	Balanc e amount in Unspe nt CSR Accoun t	Amount spent in the Financi al Year (in Rs.)	Amount transferred to a Fund as specified under Schedule VII		Amount remaining to be spent in succeedin g Financial Years (in Rs.)	Deficienc y, if any
					Amou nt (in Rs.)	Date of Transf er		
1	FY 1							
2	FY 2							
3	FY 3							

8. Whether any capital assets has been created or acquired through CSR amount spent in the Financial Year:

( ) Yes ( ) No

If Yes, enter the number of Capital assets created/ acquired:

Furnish the details relating to such asset(s) so created or acquired through CSR amount spent in the Financial Year:

S No	Short particulars of the property or assest(s)	Pincode of the property or assest(s)	Date of creation	Amount of CSR amount spent	Details of Entity/ Authority/ Beneficiary of the registered owner		
					CSR Registration number if applicable	Name	Registered Address

(All the fields should be captured as appearing in the revenue record, flat no, house no, Municipal Office/ Municipal Corporation/ Gram panchayat are to be specified and also the area of the immovable property as well as boundaries)

9. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per subsection (5) of section 135:

Signature (CEO or MD or Director)	Signature (Chairman of CSR Committee)
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**ANNEXURE III**

<b><u>S No</u></b>	<b><u>Name</u></b>	<b><u>Designation</u></b>	<b><u>Department/Section</u></b>	<b><u>Date of Addition</u></b>	<b><u>Date of Deletion</u></b>	<b><u>Remarks</u></b>