A.K. CAPITAL SERVICES LTD.

BUILDING BONDS

CORPORATE SOCIAL RESPONSIBILITY POLICY

Last reviewed/amended by Board of Directors at their meeting held on February 9, 2024

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1. PREAMBLE:

The concept of Corporate Social Responsibility (CSR) is strongly connected with the principles of sustainability. The concept and need for CSR has gained prominence from all avenues. It is recognized that integrating social, environmental and ethical responsibilities into the governance of businesses ensures their long term success, competitiveness and sustainability. Our vision is – "to actively contribute to the social and economic development of the communities in which we operate. A. K. Capital Services Limited (AKCSL) believes that in alignment with its vision, AKCSL through its CSR initiatives will continue to enhance value and promote social sustainability, sustainable development of the environment and social welfare of the people and society at large.

2. SHORT TITLE AND APPLICABILITY:

This Policy on Corporate Social Responsibility encompasses the company's philosophy for giving back to the society as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful Program for the welfare and sustainable development of the community at large, is titled as "CSR Policy of AKCSL". This Policy shall apply to all CSR initiatives and activities taken up at various work centers, branches and locations of AKCSL including donations and contributions made in accordance with the applicable law.

3. OBJECTIVE:

CSR is a form of corporate self-regulation integrated into a business model and the main objective of introduction of CSR policy is to lay down guidelines and general framework of action for AKCSL, and to make CSR a key business process for sustainable development for the Society and thus contribute value addition towards the same. The Policy will function and strive to create value in the society and in the community in which it operates, through its services, contributions, conduct & initiatives, so as to promote sustained growth for the society and community.

4. DEFINITIONS:

In this Policy, unless the context requires otherwise:

a) "**Act**" means the Companies Act, 2013 and the Rules made thereunder, as amended from time to time,

b) "**Administrative overheads**" means the expenses incurred by the Company for 'general management and administration' of Corporate Social Responsibility functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.

c) "**Corporate Social Responsibility (CSR)**" means and includes but is not limited to –

   (i) Projects or programs relating to activities specified in Schedule VII to the Act; or

   (ii) Projects or programs relating to the activities approved by the Board in pursuance of the recommendations of the CSR Committee covering subjects enumerated in Schedule VII of the Act, including amendment thereto.

d) "**CSR Committee**" means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act.

e) "**CSR Policy**" means Corporate Social Responsibility Policy framed and implemented by AKCSL, including amendments thereto.

f) "**Net profit**" shall mean the net profits of the Company as defined under the Act and the Rules based on which a specific percentage for CSR expenditure has to be calculated.

g) "**Ongoing Project**" means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.

Words and expressions used and not defined in this policy but defined in the Act shall have the same meanings respectively assigned to them in the Act.

5. CSR COMMITTEE:

(a) Composition:

The Corporate Social Responsibility Committee (CSR Committee) shall comprise of three or more Directors, out of which at least one shall be an Independent Director. The members of the CSR Committee shall elect one of them as the Chairman of the Committee. An outgoing member of the CSR Committee may be replaced by any other member of the Board.

(b) Role: The CSR Committee shall:

i. formulate and recommend to the Board, the CSR Policy which shall indicate the activities to be undertaken by AKCSL in areas or subject as specified in Schedule VII of the Act;

ii. recommend the amount of expenditure to be incurred on the activities to in clause (i);

iii. monitor the CSR Policy from time to time;

iv. ensure legal and regulatory compliance from a CSR viewpoint

v. formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy and in accordance with the applicable provisions of the Companies Act, 2013 and rules made thereunder.

vi. Any other matter as may be considered expedient in furtherance of and to comply with CSR Policy of AKCSL and such other duties, responsibilities as may be defined/ required to be performed under the act.

(c) Meetings: The CSR Committee shall meet as and when deemed necessary to perform the duties and responsibilities provided under the Act and this Policy.

(d) Quorum: Quorum of the meeting of CSR Committee shall be one third of the total strength or two Directors, whichever is higher. The CSR Committee may invite executives, advisors, representatives of social organisations, Auditors of the Company or such other person(s) as it may consider necessary to attend the meeting.

6. CSR ACTIVITIES:

The Company shall undertake any of the following activities/projects or such other activities/projects as may be notified by the Ministry of Corporate Affairs from time to time as a part of the Corporate Social Responsibility:

a) Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
b) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
c) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
d) 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;
e) Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art, setting up public libraries, promotion and development of traditional arts and handicrafts;
f) 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]
g) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.
h) 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 for socio-economic development and relief and welfare of the Schedule Castes, the Scheduled Tribes, other backward classes, minorities and women;
i) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of 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 Defense 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);
j) Rural development projects;
k) Slum area development;
l) Disaster management, including relief, rehabilitation and reconstruction activities; and
m) Any other activities in relation to the above and all other activities which forms part of CSR as per Schedule VII of the Companies Act, 2013 as amended from time to time.

7. CSR EXPENDITURE:

AMOUNT TO BE SPENT ON CSR ACTIVITIES:

a) The CSR Committee and the Board of Directors will note and record the amount of expenditure to be incurred by the Company on the CSR activities. The basis for such recommendation will be the profits of the Company and the percentage prescribed under the Act.

b) The Annual CSR Budget shall be spent on activities laid down in the CSR Policy of AKCSL.

c) The board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.

d) Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

e) Where the Company spends excess amount for CSR activities such excess amount may be set off against the requirement to spend under Section 135(5) up to immediate succeeding three financial years subject to the condition that the excess amount available for set off shall not include the surplus arising out of the CSR activities and the Board resolution is passed to that effect.

f) The CSR amount may be spent by a company for creation or acquisition of a capital asset, which shall be held by a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number under sub-rule (2) of rule 4 or beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities or a public authority.

g) If the Company fails to spend amount required to be spent under CSR obligation, the Board shall specify the reasons for not spending such amount in the Board's Report. If the unspent amount pertains to "ongoing project" such unspent amount shall be transferred to a separate bank account opened with Scheduled bank to be called as "Unspent CSR Account" within 30 days from the end of financial year and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

h) If the unspent amount does not pertain to "ongoing project" such unspent amount shall be transferred to the National Fund or the Fund prescribed under Schedule VII within 6 months from the end of the financial year.

i) Until a fund is specified in Schedule VII for the purposes of subsection (5) and(6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act."

8. IMPLEMENTATION OF CSR:

i. The Board 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 (explanation - the term "entity" shall mean a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act); 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.

ii) The CSR Committee shall ensure that every entity that intends to undertake any CSR activity is registered with Ministry of Corporate Affairs, has complied with requisite formalities and complies with regulatory requirements as provided under the laws for the time being in force.

iii) A company may engage international organisations for designing, monitoring and evaluation of the CSR projects or Program as per its CSR policy as well as for capacity building of their own personnel for CSR.

iv) A company may also collaborate with other companies for undertaking projects or Program 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 Program in accordance with The Companies (Corporate Social Responsibilities Policy) Rules, 2014 as amended from time to time.

v) The Board of a company shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it. The Chief Financial Officer or the person responsible for financial management shall certify to the effect shall certify to the effect.

vi) In case of ongoing project, the Board of a Company 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 time period.

vii) The time period over which a particular project/Program will be spread, will depend on its nature, extent of coverage and the intended impact of the project/Program. By and large, it may be ensured that the CSR Program shall be executed in and around the areas adjoining Company's workplace/work centers/branches/locations.

viii) CSR Policy and Projects approved by the Board shall be published/ displayed on the website of the company for public access.

9. CSR REPORTING MECHANISM:

a) Appropriate documentation of CSR Policy of AKCSL, annual CSR activities and expenditure entailed will be undertaken on a regular basis.

b) The Board's Report of a company covered under the Act pertaining to any financial year shall include an annual report on CSR containing particulars specified in the Act.

c) Every company having average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

d) The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.

e) A Company undertaking impact assessment may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed two percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is higher.

f) CSR initiatives of AKCSL will be reported in the Annual Report of AKCSL and the Board's Report in compliance with Section 135 of the Companies Act, 2013 and the Rules made thereunder.

10. REVIEW/AMENDMENT IN POLICY:

Any amendment in this Policy may be carried out with the approval of the Board of Directors of the Company, based on the recommendations of CSR Committee.

In case any amendment(s), clarification(s), circular(s) and guideline(s) issued by applicable regulatory authority (ies), that is not consistent with the requirements specified under this Policy, then the provisions of such amendment(s), clarification(s), circular(s) and the guideline(s) shall prevail upon the requirements hereunder and this Policy shall stand amended accordingly effective from the date as laid down under such amendment(s), clarification(s), circular(s) and guideline(s).

Sd/- (Chief Executive Officer or Managing Director or Director	Sd/- (Chairman CSR Committee)	Sd/- (Person specified under clause (d) of sub-section (1) of section 380 of the Act) (wherever applicable)

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Corporate Social Responsibility for the Financial Year 2017-18

Sr. No	CSR Projects or activity identified	Sector in which project is covered	Location where Projects or Programs were undertaken		Amount outlay (budget) project or programs	Amount spent on Projects or Programs		Amount spent directly or through implementing agency
			Local Area or other	The State and district where projects or programs was undertaken		Direct Expenditure	Overhead	
1	Providing quality educational experiences to improve human capital and to create quality manpower for a knowledge society in association with KA-VYAPTA International Trust	Education	Other	Jamshedpur, Jharkhand	INR 52,00,000/-*	INR 52,00,000/-	NA	Through KA-VYAPTA International Trust (Implementing Agency)

*The amount includes budget allocated by the Company for project or program.

Corporate Social Responsibility for the Financial Year 2018-19

Sr. No	CSR Projects or activity identified	Sector in which project is covered	Location where Projects or Programs were undertaken		Amount outlay (budget) project or programs	Amount spent on Projects or Programs		Amount spent directly or through implementing agency
			Local Area or other	The State and district where projects or programs was undertaken		Direct Expenditure	Overhead	
1	Mission to offer an unusual education system that combines the best of Vedic education and modern education aiming to preserve, protect and promote the Vedas	Education	Local	Chennai	INR 26,50,000/-	INR 26,50,000/*-	NA	Through Sri Kanchi Mahaswami Trust (Implementing Agency).

*The amount includes budget allocated by the Company for project or program.

Corporate Social Responsibility for the Financial Year 2019-20

Sr. No	CSR Projects or activity identified	Sector in which project is covered	Location where Projects or Projects or programs (1) Local area or other (2) Specify the State and district where projects or programs was undertaken	Amount outlay (budget) project or programs	Amount spent on Projects or Programs		Amount spent directly or through implementing agency
					Direct Expenditure*	Over head	
1	Contribution made to funds notified in Schedule VII of the Companies Act, 2013 - **Prime Minister's National Relief Fund**	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 govt. for socio economic development and relief and welfare of the schedule caste,tribes, other backward classes, minorities and women;	Pan India	INR 40,00,000/-	INR 40,00,000/-	NA	**Through implementing agency**
2	Contribution made to funds notified in Schedule VII of the Companies Act, 2013 - **Clean Ganga Fund**	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].	Pan India	INR 23,75,000/-	INR 23,75,000/-	NA	**Through implementing agency**
3	Contribution made to funds notified in Schedule VII of the Companies Act, 2013 - **Swach Bharat Kosh**	Eradicating hunger, poverty and malnutrition, [''promoting health care including preventive health care''] and sanitation [including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking	Pan India	INR 35,00,000/-	INR 35,00,000/-	NA	**Through implementing agency**

4	Contribution made to funds notified in Schedule VII of the Companies Act, 2013 - **Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)**	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 govt. for socio economic development and relief and welfare of the schedule caste,	Pan India	INR 50,00,000 /-	INR 50,00,000 /-	NA	**Through implementing agency**

*The amount includes budget allocated by the Company for project or program.

Corporate Social Responsibility for the Financial Year 2020-21

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Sl. No.	**Name of the Project**	**Item from the list of activities in schedule VII to the Act**	**Local area**	**Location of the project**	**Amount spent for the project (in INR)**	**Mode of implementation – Direct (Yes/No)**	**Mode of implementation – Through implementing Agency**
1.	The Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 76,51,000	Not Applicable	Not Applicable

Corporate Social Responsibility for the Financial Year 2021-22

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Sl. No.	**Name of the Project**	**Item from the list of activities in schedule VII to the Act**	**Local area**	**Location of the project**	**Amount spent for the project (in INR)**	**Mode of implementation – Direct (Yes/No)**	**Mode of implementation – Through implementing Agency**
1.	Clean Ganga Fund-National Mission for Clean Ganga	Item no (iv) of Schedule VII	PAN INDIA	PAN INDIA	INR 15,00,000/-	Not Applicable	Not Applicable
2.	Swach Bharat Kosh	Item no (i) of Schedule VII	PAN INDIA	PAN INDIA	INR 15,00,000/-	Not Applicable	Not Applicable
3.	Prime Minister's National Relief Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 15,00,000/-	Not Applicable	Not Applicable
4.	PM Cares Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 15,00,000/-	Not Applicable	Not Applicable

Corporate Social Responsibility for the Financial Year 2022-23

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Sl. No.	**Name of the Project**	**Item from the list of activities in schedule VII to the Act**	**Local area**	**Location of the project**	**Amount spent for the project (in INR)**	**Mode of implementation – Direct (Yes/No)**	**Mode of implementation – Through implementing Agency**
1.	Clean Ganga Fund-National Mission for Clean Ganga	Item no (iv) of Schedule VII	PAN INDIA	PAN INDIA	INR 15,00,000/-	Not Applicable	Not Applicable
2.	Swach Bharat Kosh	Item no (i) of Schedule VII	PAN INDIA	PAN INDIA	INR 15,00,000/-	Not Applicable	Not Applicable
3.	Prime Minister's National Relief Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 15,00,000/-	Not Applicable	Not Applicable
4.	PM Cares Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 10,50,000/-	Not Applicable	Not Applicable

Corporate Social Responsibility for the Financial Year 2022-23

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Sl. No.	**Name of the Project**	**Item from the list of activities in schedule VII to the Act**	**Local area**	**Location of the project**	**Amount spent for the project (in INR)**	**Mode of implementation – Direct (Yes/No)**	**Mode of implementation – Through implementing Agency**
1.	Clean Ganga Fund-National Mission for Clean Ganga	Item no (iv) of Schedule VII	PAN INDIA	PAN INDIA	INR 15,00,000/-	Not Applicable	Not Applicable
2.	Swach Bharat Kosh	Item no (i) of Schedule VII	PAN INDIA	PAN INDIA	INR 15,00,000/-	Not Applicable	Not Applicable
3.	Prime Minister's National Relief Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 15,00,000/-	Not Applicable	Not Applicable
4.	PM Cares Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 10,50,000/-	Not Applicable	Not Applicable

Corporate Social Responsibility for the Financial Year 2023-24

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Sl. No.	**Name of the Project**	**Item from the list of activities in schedule VII to the Act**	**Local area**	**Location of the project**	**Amount spent for the project (in INR)**	**Mode of implementation – Direct (Yes/No)**	**Mode of implementation – Through implementing Agency**
1.	Clean Ganga Fund-National Mission for Clean Ganga	Item no (iv) of Schedule VII	PAN INDIA	PAN INDIA	INR 20,00,000/-	Not Applicable	Not Applicable
2.	Swach Bharat Kosh	Item no (i) of Schedule VII	PAN INDIA	PAN INDIA	INR 20,00,000/-	Not Applicable	Not Applicable
3.	Prime Minister's National Relief Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 20,00,000/-	Not Applicable	Not Applicable
4.	PM Cares Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 8,70,000/-	Not Applicable	Not Applicable

Corporate Social Responsibility for the Financial Year 2024-25

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Sl. No.	**Name of the Project**	**Item from the list of activities in schedule VII to the Act**	**Local area**	**Location of the project**	**Amount spent for the project (in INR)**	**Mode of implementation – Direct (Yes/No)**	**Mode of implementation – Through implementing Agency**
1.	Clean Ganga Fund-National Mission for Clean Ganga	Item no (iv) of Schedule VII	PAN INDIA	PAN INDIA	INR 20,00,000/-	Not Applicable	Not Applicable
2.	Swach Bharat Kosh	Item no (i) of Schedule VII	PAN INDIA	PAN INDIA	INR 12,35,000/-	Not Applicable	Not Applicable
3.	Prime Minister's National Relief Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 20,00,000/-	Not Applicable	Not Applicable
4.	PM Cares Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 20,00,000/-	Not Applicable	Not Applicable

Corporate Social Responsibility for the Financial Year 2025-26

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Sl. No.	**Name of the Project**	**Item from the list of activities in schedule VII to the Act**	**Local area**	**Location of the project**	**Amount spent for the project (in INR)**	**Mode of implementation – Direct (Yes/No/NA)**	**Mode of implementation – Through implementing Agency**
1.	Prime Minister's National Relief Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 25,00,000/-	Not Applicable	Not Applicable
2.	PM Cares Fund	Item no (viii) of Schedule VII	PAN INDIA	PAN INDIA	INR 25,00,000/-	Not Applicable	Not Applicable
3.	Clean Ganga Fund-National Mission for Clean Ganga	Item no (iv) of Schedule VII	PAN INDIA	PAN INDIA	INR 26,83,776/-	Not Applicable	Not Applicable