

CORPORATE SOCIAL RESPONSIBILITY POLICY OF SWATI SPENTOSE PRIVATE LIMITED

Corporate Social Responsibility (CSR) builds a dynamic relationship between a Company, the society and environment. CSR is traditionally driven by a moral obligation and philanthropic spirit. **SWATI SPENTOSE PRIVATE LIMITED** (“SSPL”) has contributed funds for the schemes of eradicating hunger and poverty; promotion of education and medical aid.

CSR VISION STATEMENT & OBJECTIVE

Through sustainable measures, actively contribute to the Social, Economic and Environmental Development of the community in which we operate ensuring participation from the community and thereby create value for the nation.

The main objective of the Policy is to establish the basic principles and the general framework of action for the management to undertake and fulfil its corporate social responsibility.

FOCUS AREAS AND MODES OF IMPLEMENTATION

Focus areas

In accordance with the requirements under the Companies Act, 2013 and the rules / regulations framed there under and circulars / clarifications issued thereunder (collectively, “Applicable Law”), SSPL CSR activities, amongst others, will focus on:

- **HUNGER, POVERTY, MAL-NUTRITION AND HEALTH**: Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.
- **EDUCATION**: Promoting education, including special education and employment-enhancing vocational skills, especially among children, women, the elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies, this also includes skilling and reskilling initiatives for those who are in need.
- **RURAL DEVELOPMENT PROJECTS**: Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.
- **ENVIRONMENTAL SUSTAINABILITY**: Ensuring environmental sustainability,

ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water.

Modes of Implementation

Sl. No	Focus Area	Implementing Strategy
1	Hunger, poverty, malnutrition and healthcare	Work directly or with non-profit organizations at infrastructure and/or operational level to support meal or nutrition related programs in schools and other institutions across India and also to spread awareness of Orphan neglected & un-served disease through foundation.
2	Education	Partner directly or with non-profit organizations, primary, secondary and higher educational institutions including schools, colleges, and universities to encourage efforts in a wide range of areas including training, provision of funding for continued education, skilling, offline and online education, research, infrastructure development and capacity building.
3	Rural Development	Partner directly or with governments and NGOs to support projects related to development and improvement of infrastructure and essential amenities, livelihood and skilling initiatives, training and education, and rehabilitating disaster affected victims in rural areas.
4.	Environmental sustainability	Work with NGOs on safeguarding the environment, including protection of flora and fauna, promoting climate action, renewable energy, natural resource conservation as well as promoting resource efficiencies across energy, water and waste management.

UNDERTAKING CSR ACTIVITIES

SSPL will undertake its CSR activities (being projects / programs / other permitted activities), approved by the CSR Committee either directly or through such other eligible entity / organization as approved by the CSR Committee.

The surplus arising out of the CSR activities shall not form part of the business profit of the Company. Such surplus shall be spent towards its CSR activities in accordance with this policy. Identification and implementation of CSR projects / programs will be monitored by the CSR Committee and the Board of Directors of the Company ("the Board"), as required under Applicable Law.

CSR ANNUAL ACTION PLAN AND LOCATION OF CSR EFFORTS

The CSR Committee shall decide on the locations for CSR activities and formulate and recommend to the Board for approval a CSR annual action plan, 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.

The Board may modify the annual action plan as per the recommendations of the CSR Committee at any time during the financial year, based on reasonable justification.

IMPACT ASSESSMENT

Impact assessment shall be undertaken by the Company or by recipient or by implementing agency as required by and in the manner set out under Applicable Law, and the impact assessment report(s) shall be placed before the CSR Committee and the Board, and shall be disclosed as legally required.

COMPOSITION OF CSR COMMITTEE AND DISCLOSURES

The CSR Committee shall be comprised in accordance with the requirements of Applicable Law. This CSR Policy, details of the composition of the CSR Committee and projects approved by the Board shall be available at the registered office of the Company.

GOVERNANCE

The Company can undertake CSR activities either by itself or through other entities eligible to undertake CSR activities under Applicable Law. The Board and the CSR

Committee will deployed initiatives in making appropriate disclosures (internal / external) on a periodic basis.

FUNDING, SELECTION AND MONITORING PROCESS

The Board and CSR Committee will evaluate proposals received and focus areas and projects will be prioritized by assessing their potential impact. The CSR committee:

- To ensure effective implementation of the CSR program undertaken at each work center, a monitoring mechanism will be put in place.
- The progress of CSR programs under implementation will be reported to corporate office on a monthly basis.
- The report on progress on the CSR program undertaken by the Company will be put forward to the CSR Committee with full details of cost incurred and results achieved on a regular basis.
- Work centers will try to obtain feedback from beneficiaries about the programs implemented at the area.
- Appropriate documentation of the Company's CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis.
- CSR initiatives of the Company will be reported in the Annual Report of the Company & the Board's Report in compliance with Section 135 and rules made thereunder.

In any 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.
