*SHREENATH INESTMENT COMPNY LIMITED*

# CSR Policy

## 1. BACKGROUND

At the outset of CSR Activities at SHREENATH INVESTMENT COMPANY LIMITED is already in existence for the benefit of the employees. It is recognized that integrating social, environmental and ethical responsibilities into the governance of businesses ensures the long term success, competitiveness and sustainability.

## 2. AIMS AND OBJECTIVES:

The Company intends to make a positive difference to society and contribute its share towards the social cause of betterment of society and area in which companies operates. The Company aims to create educated, healthy, sustainable and culturally vibrant communities.

In this regard, the Company has made this policy which encompasses the Company's philosophy for delineating its responsibility as a Corporate Citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large and titles as the "Corporate Social Responsibility (CSR) Policy" which is based as per the Companies Act, 2013 and rules made there under.

## 3. DEFINITION

- ***Act*** *means Companies Act, 2013, as amended and modified from time to time*
- ***Board*** *means Board of Directors of the Company.*
- ***Company*** *means SHREENATH INVESTMENT COMPANY LIMITED.*
- ***Corporate Social Responsibility (CSR)*** *means and includes but is not limited to:*

  1) *Projects or programs relating to activities specified in Schedule VII to the Companies Act, 2013; or*

  2) Projects or programs relating to activities undertaken by the Board of Directors of the Company in pursuance of the recommendation of the CSR Committee and approved by the Board as per this policy.

- ***CSR Committee*** *means Corporate Social Responsibility Committee constituted by the Board pursuant to section 135 of the Companies Act, 2013.*
- ***CSR Activities*** *shall mean activity which is specified as per Schedule VII of the Companies Act, 2013.*

- ***CSR Policy*** *means CSR Policy of The Company*

- ***CSR Rules*** *means the Companies (Corporate Social Responsibility) Rules, 2014, as amended and modified from time to time;*

- ***Employees*** *means Employees of the Company;*

- ***Funding*** *shall mean the disbursements that are to be made to an Organization pursuant to this CSR Policy, with the prior approval of the CSR Committee and the Board in accordance with the Act and Rules;*

- ***Net Profit*** *means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Companies Act, 2013, but shall not include the followings, namely:-*

  1) Any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise, and

  2) Any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Companies Act, 2013.

  Words and expressions used in this policy and not defined herein but defined under the Companies Act, 2013 shall have the same meanings respectively assigned to them.

## *4. COMPOSITION OF CSR COMMITTEE*

The CSR initiatives/activities of the Company will be identified and initiated by the CSR Committee comprising 3 (three) Members of the Board. Subject to the requirements of the Act, the Board may increase or decrease the size of the CSR Committee by passing a resolution.

The members of the CSR Committee shall elect one of them as the Chairman of the Committee. The CSR Committee shall recommend to the Board the amount of expenditure to be incurred by the Company on CSR activities and the Board will ensure that the activities as are included in the CSR Policy are undertaken by the Company subject to and in accordance with the provisions of section 135 of the Companies Act, 2013.

## CSR COMMITTEE COMPOSITION OF THE COMPANY:

Mr. Bhavya Dilip Sundesha - Chairman

Ms. Renu Jain - Member

Mr. Jatin Ramanlal Jain - Member

The CSR Committee may, at its discretion, invite employees of The Company from time to time to participate in the meetings of the CSR Committee and assist the CSR Committee in the implementation of CSR policy. Invitees to the CSR Committee meetings shall be entitled to participate in the meeting of the CSR Committee but will not be entitled to vote at the meetings of the CSR Committee. All decisions of the Committee shall be ratified by the Board.

### *5. The role/responsibilities of the CSR Committee include:*

1. Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Companies Act 2013.

2. Recommend the amount of budgeted expenditure to be incurred on the activities referred to in clause (1) above.

3. Ensuring that in each financial year the Company spends at least 2% of the average net (if Company falls under the Criteria which is specified under Section 135 of the Companies Act, 2013) profit made during the three immediate preceding financial year

4. Monitor the Corporate Social Responsibility Policy of the company from time to time.

5. Institute a transparent monitoring mechanism for implementation of the CSR projects/programs/activities.

6. Monitor implementation of CSR activities on quarterly basis.

## 6. ACTIVITIES TO BE UNDERTAKEN BY THE COMPANY

1. Eradicating hunger and poverty and malnutrition, promoting health care including preventive health care and sanitation including swach Bharat kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;

2. Promoting of education including special education and employment enhancing vocatiom skills especially among children,, women, elderly and the differently abled and livelihood enhancement projects;

3. Promoting gender equality and 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;

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;

7. Training to promote rural sports, nationally recognized sports, and Para-Olympics sports and Olympic sports;

8. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Government for socio economic development and relief and funds for the welfare of the scheduled castes, the scheduled tribes, other backward classes, minorities and women; and

9. Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

10. Rural development projects;

11. Slum area development;

## *7. THE CSR APPROACH*

The company strongly believes that sustainable community development is essential for harmony between the community and the industry. It endeavours to make a positive contribution to the underprivileged communities by supporting a wide range of socio-economic, educational and health initiatives. Also, it is committed to integrate its business values and operations to meet the expectations of all its stakeholders.

## *8. MONITORING*

CSR committee of the company will be responsible for the monitoring of various CSR projects or programs undertaken by the company directly or indirectly. The committee shall ensure that:

i. Company undertakes the CSR activities as provided in the CSR policy

ii. The projects/ programs are implemented as per the program approved by the board

iii. The budget allocated for each of the project is utilized for the projects as per the approved plans.

iv. The objective of the project/program is achieved as per the plans

v. Company shall provide necessary resources and human capital for implementation and the effective monitoring of the CSR projects and programs as may be directed by the CSR Committee. The services of any external agencies or persons who have experience in the same or similar projects or programs undertaken or proposed to be undertaken by the company may also be made available for successful implementation an monitoring of the project.