



ISO 9001 : 2008 Company

Satra Properties (India) Limited

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CORPORATE SOCIAL RESPONSIBILITY POLICY

BACKGROUND:

Corporate Social Responsibility (CSR) is the Company's sense of responsibility towards the community and environment in which it operates. It is the continuing commitment by business to behave ethically and contribute to economic development of the society at large and building capacity for sustainable livelihoods.

Satra Properties (India) Limited (SPIL) has undertaken and shall continue to undertake appropriate CSR measures having direct, measurable and positive economic, social, and environmental impact on the community with particular emphasis on the local area and areas around where it operates. Our CSR, thus, is not limited to philanthropy, but also includes large initiatives that leads us to social development and institution building.

The Projects/Programs undertaken or proposed to be undertaken either by an Implementation Agency or the Company directly are/shall be in line with the activities enumerated in Schedule VII of the Companies Act, 2013 with rules framed thereunder (including any statutory modifications or re-enactments thereof for the time being in force as amended from time to time).

OBJECTIVE:

The objective of the CSR policy of the Company is to lay down guidelines for proper execution of CSR activities of the Company so as to support the sustainable development of the society.

APPLICABILITY OF THE POLICY:

- This CSR Policy shall be implemented in accordance with the provisions of Section 135 of the Act and the rules made thereunder as may be amended from time to time. It shall apply to all projects / activities undertaken by SPIL as per Schedule VII of the Companies Act 2013.
- The CSR activities shall not include activities undertaken by SPIL in pursuance of the normal course of its business.

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE AND ITS RESPONSIBILITIES:

The Corporate Social Responsibility Committee (CSR Committee) formed by the Board of Directors of the Company provides an oversight of the execution of CSR policy to ensure that the CSR objectives of the Company are met.

The responsibilities of the CSR Committee includes:-

- Formulating and recommending to the Board of Directors, the CSR policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013.
- Recommending the amount of expenditure for the CSR activities as specified in Schedule VII of the Companies Act, 2013.
- Monitoring CSR Policy of the Company from time to time.
- The CSR Committee shall institute a transparent monitoring mechanism for implementation of the CSR Projects or programs or activities undertaken by the Company.

CSR ACTIVITIES, PROJECTS, OR PROGRAMMES:

In accordance with the requirements under the Companies Act, 2013 (as may be amended from time), the Company has inter alia identified and plans to undertake any one or more of the following activities as a part of its CSR policy:

- 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 water;
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- 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;
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, 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;
- 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;
- Measures for the benefit of armed forces veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;

- Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- Rural development projects.
- Slum areas development.

Explanation: the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

MODALITIES OF EXECUTION OF SUCH PROJECT OR PROGRAMS:

The approved CSR activities, projects and programs may be carried out in any of the following ways as the CSR Committee in its absolute discretion may decide. The CSR Committee may decide to use any one or all or a combination of any of the following ways to undertake the said CSR activities, projects and programs:

- a) by the Company directly;
- b) through a registered trust or a registered society or a Company established under section 8 of the Companies Act, 2013 by the Company, either singly or alongwith its holding or subsidiary or associate Company, or alongwith any other Company or holding or subsidiary or associate Company of such other Company, or otherwise:

Provided that, if such trust, society or Company is not established by the Company, either singly or alongwith its holding or subsidiary or associate Company, or alongwith any other Company or holding or subsidiary or associate Company of such other Company, it shall have an established track record of three years in undertaking similar programs or projects.

In the event the CSR activities are undertaken by the entities listed in (b) above, the CSR Committee shall specify the activities, projects or programs that are to be undertaken, the modalities for utilization of funds on such projects and programs and the monitoring and reporting mechanisms to be followed in that regard.

- c) A Company may also collaborate with other Companies for undertaking projects or programs or CSR activities in such a manner that the CSR Committees of the respective Companies would be in a position to report separately on such projects or programs in accordance with the prescribed rules of the Companies Act, 2013 as may be amended from time to time.

IMPLEMENTATION AND MONITORING:

- The implementation schedule for each approved activity, project or programs shall also be approved by the CSR Committee and all such activities, projects and programs will be accordingly monitored by the CSR Committee.
- A report on a periodic basis, as may be desired by the Board, shall be provided to the Board by the CSR Committee.

CSR EXPENDITURES:

- The CSR expenditures shall include all expenditures, including contribution to corpus on the activities, projects or programs as are approved by the Board on the recommendation of its CSR Committee and shall not include expenditures on any item not in conformity or not in line with activities which fall within purview of Schedule VII of the Companies Act, 2013.
- Contribution to Corpus of a Trust / society / section 8 Companies etc. will qualify as CSR expenditure as long as:
 - a. the Trust/ society / section 8 Companies etc. is created exclusively for undertaking CSR activities or
 - b. where the corpus is created exclusively for a purpose directly relatable to a subject covered in Schedule VII of the Companies Act, 2013.

QUALIFICATIONS AND EXCLUSIONS:

- The CSR projects or programs or activities that benefit only the employees of the Company and their families shall not be considered as CSR activities in accordance with section 135 of the Companies Act, 2013.
- Activities undertaken in pursuance of normal course of business of the Company shall not be considered as CSR activity under the Policy.
- Contribution of any amount directly or indirectly to any political party under section 182 of the Companies Act, 2013, shall not be considered as CSR activity.
- Expenditure incurred by Foreign Holding Company for CSR activities in India will qualify as CSR spend of the Indian subsidiary if, the CSR expenditures are routed through Indian subsidiaries and if the Indian subsidiary is required to do so as per section 135 of the Companies Act, 2013.
- Only those CSR activities, projects or programs that are undertaken in INDIA shall qualify as CSR activities under the Policy.
- One-off events such as marathons / awards / charitable contributions / advertisements/ sponsorships of TV programmes etc., shall not be considered as part of CSR expenditures under the Policy.
- Expenses incurred by Companies for fulfilling the requirements of any act / statute of regulations (such as Labour Laws, Land Acquisition Act etc.) shall not be counted as CSR expenses under the Companies Act, 2013.

TREATMENT OF SURPLUS:

Any surplus that may arise out of the approved CSR activities, projects and programs that are carried out shall not form part of the business profits of the Company and such surplus shall be dealt with in the manner deemed appropriate by the CSR Committee.

CSR REPORTING:

The Board's Report of a Company covered under the prescribed rules of the Companies Act, 2013 pertaining to a financial year commencing on or after the 1st day of April, 2014 shall include an annual report on CSR containing particulars specified in Annexure of the Companies (Corporate Social Responsibility Policy) Rules, 2014.

AMENDMENTS TO THE POLICY:

The CSR Policy referred to above is to be read in conjunction with the Companies Act, 2013 and rules framed thereunder as may be amended from time to time.

Any or all provisions of the CSR Policy would be subject to revision / amendments in accordance with the guidelines on the subject as may be issued from any statutory / regulatory authorities from time to time or as may be decided by the Board of Directors of the Company.

The above policy is subject to review at suitable intervals and subject to revision / amendments accordingly, if required.