

## CSR POLICY

This Corporate Social Responsibility (hereinafter referred to as 'CSR') Policy is framed in terms of the Companies Act, 2013 (hereinafter referred to as 'the Act') read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as 'the CSR Rules'), as amended from time to time.

Programmes, projects and activities (hereinafter collectively referred to as 'CSR Programmes') carried out in this regard are the subject matter of this Policy.

### CSR Philosophy

With an intent of 'giving back to the Society', Syrma Technology Private Limited ("Syrma"/"the Company"), vide its CSR programmes, aims to be a trusted partner contributing to the social, economic and environmental progress of India and shall keep striving towards its CSR initiatives to foster a culture of trust and continuous learning & development.

### Objective

As a responsible corporate citizen and as part of its endeavour towards inclusive development of society and community at large, Syrma recognizes the significance of the philosophy and the concept of CSR, which will add value to the operations and contribute towards the long term sustainability of the business and eventually, enhance the interests of the stakeholders and the society.

### Identified CSR Areas

The scope of the CSR activities of the Company will cover the following areas but not limited to the same and may extend to other specific projects/ programs as permitted under the law from time to time.

Sr. No.	Area	Activities/Initiatives/Programs
1	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects	Construction and running of schools and libraries, vocational training and special education institutes, providing financial assistance and scholarships for higher education. Undertaking and skills and entrepreneurship programs
2	Eradicating hunger, poverty and malnutrition	Agro Based livelihoods, Better Cotton Initiatives, Agriculture Development, Krishi Vigyan Kendra
3	Promoting health care including preventive healthcare and sanitation	Health and Sanitation Development programs, medical camps, programs for HIV Aids etc.
4	Providing safe drinking water	Drinking water programs, construction of check dams, dykes, ponds, links, channels, wells and water storage tanks.

5	Women Empowerment and Facilities for Senior Citizens	Setting up centres and institutions for women & senior citizenship. Promoting SHGs amongst women for undertaking income generating activities.
6	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;	Horticulture plantation, agro farm forestry, afforestation, projects on non-conventional energy (biogas), animal husbandry programs, forest conservation projects, water resource management and soil conservation, promoting micro-irrigation etc.
7	Promotion and protection of art & culture	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;
8	Measures for the benefit of armed forces veterans, war widows and their dependents	Activities/programs for benefit of armed forces and families
9	Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;	Projects/programs promoting various sports activities
10	Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;	Projects/programs for the development and upgrading of technology
11	Contribution/Financial Assistance	Contribution to 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
12	Rural development projects	Rural infrastructure projects and agriculture development programs and projects

### Exclusion from CSR

- The following activity shall not form part of the CSR activities of the Company:-
- The activities undertaken in pursuance of normal course of business of a company.
- CSR projects/programs or activities that benefit only the employees of the Company and their families.
- Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
- Any CSR projects/programs or activities undertaken outside India.
- 

### CSR Budget & Spend

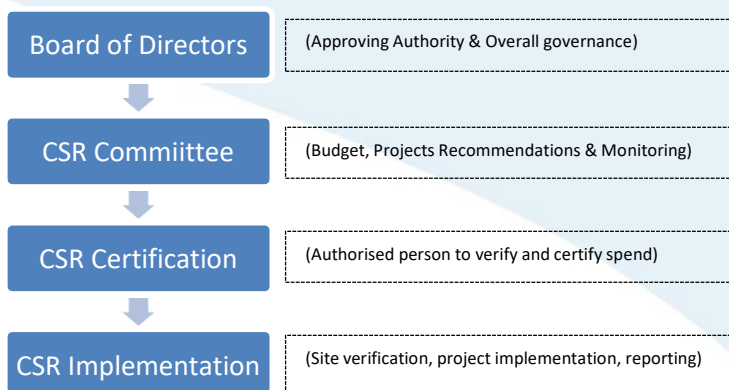
The Board of the Company shall allocate at least 2% of the average profit (as required by the Companies Act, 2013) during the three preceding financial years.

In case of any surplus arising out of CSR programs the same shall not form part of business profits of the

Company and shall be ploughed back into its CSR programmes. The Company will comply with the provisions of the Act and the CSR Rules with respect to Unspent CSR amount with regard to Ongoing Projects and projects not classified so.

**Governance Structure:**

The CSR Governance Structure, is detailed below:



The Board of Directors of the Company shall:

- Approve CSR policy of the Company.
- Ensure 2% mandatory spend of the average net profit of preceding 3 years.
- Carry out activities which will qualify as CSR under Schedule VII of the Companies Act, 2013 and rules relating to CSR, as amended from time to time.
- Undertake activities that qualify as CSR under Schedule VII of the Companies Act, 2013 and rules relating to CSR, as amended from time to time based on urgency and need arising out of circumstances such as natural disasters and emergencies.
- Approve the Annual Action Plan (including amendments thereto) as recommended by the CSR Committee.
- Disclose the Composition of CSR Committee, Framework & Policy, approved projects on the Company’s website as prescribed under Section 135 of the Companies Act 2013
- Categorize a project as a multi-year project, wherever required, in line with provisions of Companies Act, 2013.
- Approve setting off excess amount spent in any financial year for the next three financial years.
- Ensure that the Company gives preference to the local areas around its operations for spending the amount earmarked for CSR projects.
- Ensure that the social programs undertaken are aligned to the CSR Policy of the Company and CSR funds disbursed have been utilized for the purposes and in the manner as approved.

The Board has formed the CSR Committee in accordance with the requirements of the Act.

Responsibilities of CSR Committee:

- Formulate and recommend the CSR Policy to the Board for approval.
- Recommend Annual Action Plan (including amendments thereto) to the Board.
- Recommend the amount of expenditure to be incurred on CSR programs.
- Monitor the Policy from time to time.

- Recommend to the Board 'Ongoing Projects' that require multi-year implementation.
- Prioritize location wise projects in line with thrust areas and overall CSR plan for the year.
- Constitute transparent monitoring mechanism for ensuring implementation of the CSR program.

Additionally, the Committee is empowered to spend such amount as they think appropriate for some other strategic CSR contingencies that may arise during any financial year. The amount spent as above shall be put up for ratification of the Committee at its next meeting and shall report to the Board accordingly. Committee is also empowered to exercise fungibility of the amounts allocated to several projects, with prudence. In no event, shall the spend amount exceed the total aggregate allocation made for that year and approved by Board.

### **CSR Certification**

The Chief Financial Officer or the individual responsible for financial management shall certify that the funds disbursed have been utilized for the purposes and in the manner as approved by the Board and proper due diligence has been carried out by CSR implementation team.

### **CSR Implementation Team**

- Seek guidance from the Board & CSR Committee regarding policy, budget, and implementation guidelines.
- Ensure CSR-1 form is obtained from implementing agencies or any other regulatory/statutory requirement, as may be required for appointing implementing agency(s), is adhered with.
- Prepare and submit annual action plan to CSR committee.
- Spread awareness regarding approved CSR policy.
- Provide guidance to volunteers/sub-teams/specific unit teams at various locations to ensure that the CSR policy and framework are adhered to.
- Recommend targets and timelines for implementation of developmental initiatives.
- Apprise project performance periodically to the Board & CSR Committee highlighting material deviations with reasons.
- Facilitate effective implementation of Company's CSR plan across locations.
- Allocate appropriate resources to achieve desired performance in alignment with CSR targets and initiatives.

### **Implementation**

- CSR programs will be undertaken by the Company in identified areas. The Company will undertake Impact assessments, as shall be required.
- The period / duration over which a particular program will be spread, will depend on its nature, extent of coverage and the intended impact of the program.
- The Company may enter into partnerships with government, business partners and communities to create multiplier effect of its social projects.
- The mode of implementation of CSR programs will include a combination of direct implementation, and /or through partners such as NGOs, Trusts, academic institutions, business associates, registered societies or other such implementing agencies etc.
- The Company will select its partners after appropriate due diligence and after complying with applicable laws and rules.
- The Company may use the services of internal teams, employee volunteers, expert agencies, consultancy firms etc., wherever required, for carrying out base line surveys, guidance on program design and implementation, impact assessment surveys, etc.

## **Monitoring, Evaluation and Reporting**

The Committee Members will receive in a prescribed format, a quarterly report on progress of projects and CSR spend from CSR implementation team.

A presentation on the progress of the CSR projects / activities will be made to the Committee by the CSR Implementation Team at in-house meetings held from time to time, as may be required. An annual presentation will be made to the Committee which will also include the details of the projects / activities planned for the ensuing year and its respective budgets.

Basis of above, CSR Committee to accordingly make a final presentation to the Board.

## **Meeting & Quorum**

The CSR Committee will meet periodically as and when required with at least two meetings of the Committee to be held in a year. Quorum of the meeting shall be at least two members either present in person or vide Audio Video Conferencing/Online facility.

The Board of Directors of Syrma will review the implementation of CSR periodically.

## **Annual Report & Disclosures**

CSR Committee shall ensure effectiveness of CSR programs and spends through third party audits and report to the Board accordingly. It shall also ensure the Board Report will include an Annual Report on the CSR activities in the format specified under the provisions of Companies Act, 2013 and rules thereunder. Impact Assessment Reports, as may be required, shall also be attached to the Annual report on CSR.

Policy last amended & approved on: August 09, 2021