

SOBHA PROJECTS AND TRADE PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

1. CSR PHILOSOPHY AND BACKGROUND

At Sobha Projects and Trade Private Limited, Corporate Social Responsibility (CSR) is not viewed as a responsibility but is rather a philosophy ingrained in the very culture of the organization. Company is engaged in the area of social and community development. The Company believes that in order to bring about lasting social change and eradicate poverty, empowerment is the key.

2. CSR COMMITTEE

2.1 The Company has constituted a Corporate Social Responsibility Committee (CSR Committee) in accordance with the provisions of Section 135 read with Companies (Corporate Social Responsibility) Rules, 2014 together with Schedule VII of the Companies Act, 2013.

The composition of the Committee is as follows:

Mr. J C Sharma	Director	Chairman
Mr. Ravi PNC Menon	Director	Member
Mr. Lalit Lahoty	Director	Member

2.2 The Committee meets as and when the need arises.

2.3 The Committee reports to the Board of the Directors of the Company.

2.4 The Board of Directors of Sobha Projects and Trade Private shall:

- a. Approve the Corporate Social Responsibility Policy and any amendments thereto, based on the recommendations of the Corporate Social Responsibility Committee.
- b. Approve the CSR activities and Annual Action Plan proposed by the CSR Committee based on the recommendations of the Implementing Agency (Sri Kurumba Educational and Charitable Trust).
- c. Review of utilization of disbursed funds.
- d. Review of Impact Assessment Reports.
- e. Monitoring of ongoing projects, if any.
- f. Any other approval / review required as per the Act.

3. SCOPE OF CSR ACTIVITIES

3.1 The Board of Directors upon the recommendation of the CSR Committee have identified the following areas listed in Schedule VII of the Companies Act, 2013 for carrying out its CSR activities (Hereinafter referred to as '**Identified Areas**')

- ❖ Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care 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, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;
- ❖ 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 art and handicrafts;
- ❖ Measures for the benefit of armed forces veterans, war widows and their dependents;
- ❖ Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports;
- ❖ Contribution to the prime minister's national relief 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;
- ❖ Contribution or funds provided to technology incubators located within academic institutions which are approved of the Central Government;
- ❖ Rural development projects.
- ❖ Slum area development.
- ❖ Such other areas as may be included in Schedule VII of the Companies Act, 2013 from time to time.

3.2 The Projects / Programmes may be undertaken by the Implementation Agency or the Company directly provided that such projects / programmes are in line with the activities enumerated in Schedule VII of the Companies Act, 2013.

4. COVERAGE OF CSR ACTIVITIES

The Company may carry out its CSR activities at such locations in India as it may deem necessary.

5. IMPLEMENTATION AGENCY

5.1 The CSR activities of the Company may be undertaken directly by the Company or through such agency(ies) as the Company may deem fit, provided that such agency(ies) meets the eligibility criteria laid down under the applicable laws.

5.2 The time period over which a particular programme or project will be executed will depend on the nature of the activity, its extent and objective sought to be achieved by the programme or project.

6. CSR BUDGET

6.1 For undertaking the CSR activities, the Company will strive to spend in each financial year a minimum of 2% of the average net profits of the previous three immediately preceding financial years.

6.2 The surplus, if any arising out of the CSR projects or programs or activities shall not form part of the business profits of the Company.

7. MONITORING MECHANISM

7.1 The monitoring of CSR activities of the Company will be undertaken by the CSR Committee of the Company.

7.2 The Company / Implementation Agency will report to the Committee on a quarterly basis on the activities undertaken and the amount of expenditure incurred by it. The report shall be in the format prescribed by the Committee.

7.3 The Committee may require the Company / Implementation Agency to furnish such additional information or reports as it may require.

7.4 The members of the Committee may either on their own and through their delegated representatives make periodic visits to the CSR sites to ascertain the progress of the CSR Projects / Programmes.

7.5 The members of the Committee shall also have the right to inspect and audit the books of accounts, records and other documents of the Company / Implementation Agency pertaining to the CSR activities of the Company, either by themselves or through the aid of external agencies.

7.6 A report on CSR activities shall be prepared by the Committee on a yearly basis which shall be included in the Annual Report of the Company.

8. REVIEW

This policy shall be normally reviewed by the Board every two years and/or at shorter intervals if required.
