



CORPORATE SOCIAL **RESPONSIBILITY POLICY**

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A policy to provide for Corporate Social Responsibility of the Company in line with regulatory guidelines.

I. INTRODUCTION

To pay back the community throughout the SRG Housing Finance Limited's ("SRGHFL" or "the Company") growth journey, this policy has been formulated to inculcate the objective of society betterment and philanthropy in its growth plan.

II. GOVERNING LAWS

i. The Companies Act, 2013

Section 135 of The Companies Act, 2013 ("the Act") states that every company having net worth of rupees five hundred crore or more, or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during the immediately preceding financial year shall constitute a Corporate Social Responsibility Committee of the Board consisting of three or more directors, out of which at least one director shall be an independent director. The committee shall formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII, recommend the amount of expenditure to be incurred on the activities, monitor the Corporate Social Responsibility Policy of the company from time to time. The Board shall ensure that the company spends, in every financial year, at least two per cent of the average net profits of the company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy etc.

ii. The Companies (Corporate Social Responsibility Policy) Rules, 2014;

iii. Other applicable guidelines.

III. APPLICABILITY

- i. Pursuant to Section 135 of the Act, CSR Provisions shall be applicable to every company having net worth of rupees five hundred crore or more, or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during the immediately preceding financial year.
- ii. Since as per the Un-Audited Financial Results of the Company for the Quarter and Nine Months Ended December 31, 2017, net profit of the Company crossed Rs. 5 Cr, the CSR provisions become applicable to the Company from the financial year 2018-19.
- iii. Accordingly, the board of directors in their meeting held on 23rd March, 2018 on recommendation of CSR Committee approved and adopted SRG Housing Finance Limited's Corporate Social Responsibility Policy.

IV. SHORT TITLE

This policy shall be known as "**SRGHFL's Corporate Social Responsibility Policy**".

V. DEFINITIONS

In this policy, unless the context otherwise requires:

- i. "Act" means The Companies Act, 2013;
- ii. "Rules" means The Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time;

- iii. "Annexure" means the Annexure appended to this policy;
- iv. "Corporate Social Responsibility (CSR)" means and includes but is not limited to:
 - a) Projects or programs relating to activities specified in Schedule VII to the Act; or
 - b) Projects or programs relating to activities undertaken by the board of directors of the Company (Board) in pursuance of recommendations of the CSR Committee of the Board as per declared CSR Policy of the Company subject to the condition that such policy will cover subjects enumerated in Schedule VII of the Act and according to the Annual Action Plan of the Company;
- v. "CSR Committee" means the Corporate Social Responsibility Committee constituted/re-constituted by the Board of Directors of the Company;
- vi. "Net profit" means the net profit of a company as per its financial statement prepared in accordance with the applicable provisions of the Act but shall not include the following, namely:
 - a) any profit arising from any overseas branch or branches of the company, whether operated as a separate company or otherwise; and
 - b) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act.

Provided that net profit in respect of a financial year for which the relevant financial statements were prepared in accordance with the provisions of the Companies Act, 1956 (1to1956) shall not be required to be re-calculated in accordance with the provisions of the Act;

Provided further that in case of foreign Company covered under these rules, net profit means the net profit of such Company as per profit and loss account prepared in terms of clause (a) of sub section of section 381 read with Section 198 of the Act.

- vii. Company means SRG Housing Finance Limited (SRGHFL);
- viii. "Board" means Board of Directors of the Company.
- ix. "Ongoing Project" means a multi-year project undertaken by a Company in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.
- x. "Administrative overheads" means the expenses incurred by the company for 'general management and administration' of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.

Words and expressions used and not defined in this policy but defined in the Act or Rules shall have the same meanings respectively assigned to them in the Act & Rules thereto.

VI. KEYELEMENTS

i. Corporate Social Responsibility Committee

a) Composition:

CSR Committee shall constitute the following members of Board:

1. Mr. Nishant Badala-Independent Director-Chairman

2. Mr. Vinod K. Jain, Managing Director-Member

3. Mrs. Seema Jain, Non-Executive Director-Member

Further Board of Directors of the company may as and when required modify the composition of CSR committee.

b) Role of CSR Committee:

Role of CSR Committee shall include but not limited to the following:

- i. Formulate and recommend to the board, a Corporate Social Responsibility policy in compliance with Section 135 of the Act and periodically review the policy.
- ii. Identify the activities to be undertaken as Corporate Social Responsibility and recommend it to the Board of Directors.
- iii. Recommend the amount of CSR expenditure to be incurred on the CSR activities undertaken by the Company.
- iv. Institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company.
- v. Monitor the implementation of the CSR Policy from time to time.
- vi. Obtain independent Professional advice/assistance with regard to CSR matters as and when required.
- vii. Review the Annual Budget, expenditure with respect to CSR programs.
- viii. Review the disclosure relating to Corporate Social Responsibility in accordance with regulatory provisions.
- ix. Review the CSR activities undertaken during the year.
- x. To work with the management to establish and develop the Company's strategic framework and objectives with respect to Corporate Social Responsibility matters.
- xi. To form and delegate authority to any sub-committee or employee(s) of the Company or one or more members of the committee

c) Meetings of CSR Committee

The CSR Committee shall meet as and when required provided the committee shall meet at least twice a year to review the CSR activities undertaken or to be undertaken by the Company and to perform its role as specified in this policy. The Committee may meet at such place and at such time as may be required by the Committee within the business hours of the Company.

ii. CSR Expenditure

- a) SRGHFL shall spend, in every financial year, at least two per cent of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of SRGHFL's Corporate Social Responsibility Policy.
- b) If SRGHFL fails to spend such amount as mentioned above, the Board shall, in its report made

under clause (o) of sub-section(3)of Section 134 of the Act, specify the reasons for not spending the amount.

- c) Net Profit shall not include such sums as may be prescribed, and shall be calculated in accordance with the provisions of Section 198.
- d) CSR expenditure shall include all expenditure including contribution to corpus, or on projects or programs relating to CSR activities approved by the Board on the recommendation of SRGHFL's CSR Committee. It shall also include expenditure on wages and salaries, tour and travels, training and development of personnel deputed on CSR activities but do not include any expenditure or item not in conformity or not in line with activities which fall within the approved CSR activities. The CSR activities undertaken in India only shall amount to CSR Expenditure.
- e) The CSR Expenditure that remains unspent/unutilized for the particular year will require carry forward of the same to a Fund specified in Schedule VII.
- f) The details of the expenditure incurred on various CSR activities under taken by the Company, the progress of various activities, balance amount to be spent etc. are to be internally reviewed and placed before the CSR Committee at periodical intervals, say once in a half year as at Sept. and March every year by the CSR Committee.
- g) At the end of each financial year, the Company shall prepare an annual report on CSR.

iii. Identification and implementation of CSR Activities

- a) The CSR Committee shall identify such specific programs/ projects/ activities undertaken as CSR. The CSR Activities would be chosen for implementation by the Company in compliance with the provisions of Section 135 read together with Schedule VII of the Act.
- b) After recommendation of the said CSR activities by the Committee the Boards of Directors give approval to the said activities and express its consent to the Committee to pursue the said activities.
- c) The following activities can be performed as CSR as per Schedule VII of the Act. Activities relating to:
 - Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare and 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 centers 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.
 - 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 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 govt. for socioeconomic development and relief and welfare of the schedule caste, tribes, other, backward classes, minorities and women;
- Contribution to the prime minister's national relief fund or PM Cares fund or any other fund set up by the central govt. for socio economic development and relief and promoting of health care, including preventive health care and sanitation and COVID 19 activity welfare of the schedule caste, tribes, other, backward classes, minorities and women;
- Contributions or funds provided to technology incubators located within academic institutions which are approved by the central govt.
- Rural development projects and other community Projects of common interests.
- Slum area development.
- Welfare measures for differently abled, old, homeless.
- Disaster management and activities including those related to amelioration and mitigation.

Out of the above CSR activities, the Committee shall decide which activity/project should be given priority for the respective financial year.

- d) After prioritizing the activities the Committee shall finalize the detail implementation project/programme, including planning for expenses against the total budget allocated for CSR activities.
- e) While implementing CSR activities preference would be given to the local areas and States where the Company has its offices.
- f) The company may perform CSR activities through:
 - A Company established under Section 8 of the Act or a registered trust or a registered society, established by the company, either singly or along with any other company, or
 - A Company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature.

Provided that–

If the Board of the Company decides to undertake CSR activities through a Company established under section 8 of the Act or a registered trust or a registered society, other than those specified above, such company or trust or society shall have an established track record of three years in undertaking similar programs or projects; and

The Company has specified the projects or programs to be undertaken, the modalities of utilization of funds of such projects and programs and the monitoring and reporting mechanism.

- SRGHFL may also collaborate with other Companies for undertaking projects or

programs or CSR activities in such a manner that the CSR Committees of respective Companies are in a position to report separately on such projects or programs in accordance with The Companies (Corporate Social Responsibility Policy) Rules, 2014.

- The CSR projects or programs or activities that benefit the employees of the Company and their families shall not be considered as CSR activities in accordance with Section 135 of the Act.
- Company may build CSR capacities of its own personnel as well as those of their Implementing agencies through Institutions with established track records of at least three financial years but such expenditure including expenditure on administrative overheads, shall not exceed 5% of total CSR expenditure of the Company in one financial year.
- Contribution of any amount directly or indirectly to any political party under Section 182 of the Act, shall not be considered as CSR activity.
- The CSR Committee shall monitor the implementation of the CSR Policy through periodic reviews of the CSR activities.
- The CSR Committee will present the annual action plan along with the list of approved CSR activities conducted by the Company to the CSR Committee together with the progress made from time to time as a part of the evaluation process under the monitoring mechanism.
- The CSR Committee may appoint external agencies to evaluate the CSR Projects and monitor its progress. The Committee would constantly monitor the implementation of the CSR Project and utilization of the CSR amount.

iv. Treatment of Surplus arising out of CSR Activities

Any surplus arising out of the CSR activities shall not form part of business profits of the Company.

v. Responsibility of Board

- a) The Board shall ensure that the Company spends, every financial year, at least two percent of the average net profits of the Company made during the preceding three financial years as prescribed under the Companies Act, 2013 towards CSR initiative.
- b) Board of Directors shall ensure that activities included by a company in its CSR Policy are related to the activities included in schedule VII of the Act. The CSR Activities does not include the activities undertaken in pursuance of normal course of business of Company.

vi. CSR Reporting

With effect from financial year 2018-19, the report of the Board of Directors of the Company shall include an annual report duly signed by the Managing Director and Chairman of the CSR Committee, on CSR which shall contain the following:

- a) Brief outline of CSR policy, including overview of projects or Programme proposed to be undertaken by the Company;
- b) Composition of CSR committee;
- c) Web-link where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company.
- d) Impact assessment of CSR projects in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, if applicable (attach the report).

- e) Details of the amount available for setoff in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social Responsibility Policy) Rules, 2014 and amount required for set off for the financial year.
- f) Average Net profit of the Company for the last three financial years;
- g) Prescribed CSR expenditure (Two percent of the average net profit made during the three immediately preceding financial years);
- h) Details of CSR spent during the financial year;
 - i. Total amount to be spent for the financial year;
 - ii. Amount unspent, if any;
 - iii. Manner in which the amount is spent during the financial year.
 - A. CSR amount spent or unspent for the financial year,
 - B. Details of CSR amount spent against ongoing projects for the financial year:
 - C. Details of CSR amount spent against other than ongoing projects for the financial year:
 - D. Amount spent in Administrative Overheads
 - E. Amount spent on Impact Assessment, if applicable
 - F. Total amount spent for the Financial Year
 - G. Excess amount for set off, if any
- i) In case of creation or acquisition of capital asset, furnish the details relating to the asset so created or acquired through CSR spent in the financial year.
- j) Specify the reason(s), if the company has failed to spend two percent of the average net profit as per section 135(5).
- k) Publish the details of CSR Policy and activities on the Company's website i.e. www.srghousing.com.

VII. BOARD APPROVED ACTIVITIES.

Board has permitted the following activities where we can contribute/ involve ourselves through our CSR activities:

Sr. No.	DESCRIPTION OF THE SECTOR	ACITIVITIES/PROJECTS IDENTIFIED	MODE OF SPENDING/ EXPENDITURE
1	EDUCATION: Promoting education, including special education and employment in enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.	1. Providing education materials including books, school bags, etc. to the poor children of government schools/colleges or schools situated in rural/backward areas. 2. a) Renovation /repair/upgradation of infrastructural facilities at government schools or schools situated in rural/backward areas viz. b) Providing materials such as computers,	Direct/Through NGOs/Trust

		<p>tables, chairs, benches, fans, lights, blackboards etc.</p> <p>c) Providing of sanitary, drinking water, solar power facilities to school/colleges.</p> <p>3. Providing financial assistance/ grant /scholarship to poor and meritorious students for persuasion of higher/professional studies.</p> <p>4. Providing training facilities to enhance vocational skills to the poor section of the society.</p> <p>5. Providing financial assistance/ grant/ scholarship etc. for providing training facilities to enhance vocational skills, livelihood enhancement projects, pursuing of higher studies/ professional studies, to the differently abled persons.</p>	
2	<p>ERADICATING HUNGER, 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.</p>	<p>1. Providing needy equipment's and other items to the hospitals– Govt. hospitals, charitable hospitals managed by trust/ society.</p> <p>2. Health camps & Blood donation camps.</p> <p>3. Providing Medical aid and Food supply and other relief items during Floods and Natural calamities as a part of Disaster relief.</p> <p>4. Supplementing of Govt-schemes like midday meal by Corporates through additional nutrition.</p> <p>5. Providing Medical and legal aid treatment to road accident victims/poor people.</p> <p>6. Contribution to the Swach Bharat Kosh setup by the</p>	<p>Direct/registered society/Trust/NGO</p>

		Central Government for the promotion of sanitation and making available safe drinking water.	
3	ENVIRONMENTALSUSTAINABILITY, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, water and air including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.	<ol style="list-style-type: none"> 1. Conservation of natural resources. 2. Environmental Sustainability by planting trees. 3. Renewable energy Projects. 4. Contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga. 	Direct/ Registered Society/Trust/NGO
4	WOMEN EMPOWERMENT: Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such facilities for senior citizens and measures for reducing in equalities faced by socially and economically backward group.	<ol style="list-style-type: none"> 1. Providing of sanitary, drinking water, solar power facilities etc. at homes and hostels for women and orphans. 2. Providing shelter to the elderly women by setting of old age homes, daycare centers & such other facilities for senior citizens(women). 3. New construction/ repair and renovation of hostels for women/ orphans – Govt./ charitable hostels. 	Direct/ Registered Society/Trust/NGO
5	WELFARE MEASURES, for differently abled, old, homeless and the destitute.	Providing infrastructure facilities for differently abled, old, homeless and the destitute, like setting up old age homes, day care centers and such facilities.	Direct/ Registered Society/Trust/NGO
6	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.	<ol style="list-style-type: none"> 1. Renovation and maintenance activities for temples and monuments around their areas of operations. 2. Financial support for setting up public libraries. 3. Preservation of different art works like paintings, 	Direct/ Registered Society/Trust/NGO

		sculptures, ceramics, manuscripts, monuments, artwork of different forms like metal and glass etc., books and archaeological items investigated by the historians and archaeologists.	
7	SPORTS, Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.	<ol style="list-style-type: none"> 1. construction, renovation and maintenance of stadiums, gymnasiums and setting up sport academies. 2. Financial support to train athletes 	Direct/ Registered Society/Trust/NGO
8	RURAL DEVELOPMENT PROJECTS	Water management/ rainwater harvesting, improving agriculture productivity and livelihoods of small and marginal farmers, community-led development for empowering rural citizens and strengthening village institutions.	Direct/ Registered Society/Trust/NGO
9	DISASTER MANAGEMENT, including relief, rehabilitation and reconstruction activities.	To provide financial support for reconstruction and rehabilitation activities for flood affected and other natural calamities affected areas.	Direct/ registered society/ Trust/NGO
10	CONTRIBUTION TO CENTRAL GOVT. Contribution to the Prime Minister's National Relief Fund or any other fund setup by the Central Government for socioeconomic development and relief and welfare of the Scheduled Caste, Scheduled Tribes, other backward classes, minorities and women.	To provide financial support for reconstruction and rehabilitation activities for flood affected and other natural calamities affected areas.	Direct/ registered society/Trust/NGO

VIII. GENERAL

- a) The Board shall have the right to modify or change the policy from time to time.
- b) Any or all provisions of the CSR policy would be subject to revision/ amendment in accordance with the guidelines on the subject as may be issued from Regulatory Authorities, from time to time.
- c) All the records pertaining to the CSR programs/ projects/ activities of the Company shall be kept in the custody of the Company Secretary.

IX. APPROVAL/REVISION HISTORY

This policy is framed by CSR Committee and approved by Board of Directors in their meeting held on March 23, 2018. This policy last updated and reviewed in the Board Meeting held on May 23, 2024.

Sd/-Vinod K. Jain
Managing Director