

SULTAN CHAND AND SONS PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)
AS APPROVED BY THE BOARD OF DIRECTORS OF THE COMPANY

1. Title and applicability

- The document describes the Corporate Social Responsibility Policy (“CSR policy”) of Sultan Chand And Sons Private Limited (“the company”). It includes the Company’s vision, mission, and other relevant attributes of Corporate Social Responsibility, its corporate philosophy of respect for the individual and the society at large.
- The Company has formulated this CSR Policy in accordance with Section 135 of the Companies Act 2013 and the Companies (Corporate Social Responsibility) Rules, 2014 as amended from time to time and the relevant amendments/notifications/ circulars and this policy shall apply to all CSR programs of the Company.

2. Vision Statement and Objectives

The Company is committed to building a sustainable business with strong social relevance and a commitment to inclusive growth and contributing to society by supporting causes on various concerns directly or through any agency. Objects include promoting education, rural development activities, healthcare, environmental sustainability, promoting sports, etc.

3. Responsibility of the Board of Directors

The responsibility of the Board of Directors shall be as under:

- To approve the CSR Policy and disclose the contents of such policy in its report. Ensure that the activities proposed in the CSR Policy are undertaken;
- Ensure that the company spends, in every financial year, at least 2% of the average net profits of the company made during the 3 immediately preceding financial years, as required under Section 135 of the Companies Act, 2013 & Rules made thereunder;
- If the company fails to spend the sum as mentioned above, then the Board shall, in its Report specify the reasons for not spending the amount.

4. Areas of CSR Activities

The Company is committed to directing its CSR resources, to a reasonable extent, for improving the quality of life of the people by focusing on social causes, including but not limited to the following areas:

- Eradicating hunger, poverty, and malnutrition, promoting health care including preventive health care and sanitation, including contribution to the Swachh 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, daycare 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, 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, and other backward classes, minorities and women;
- Contributions or funds provided to technology incubators located within academic institutions that are approved by the Central Government;
- Rural Development Projects;
- Slum area development; and
- Disaster management, including relief, rehabilitation, and reconstruction activities.

The following activities will not be from the CSR expenditure of the Company:

- Activities which are exclusively for the benefit of employees of the company or their family members;
- Activities undertaken in pursuance of the normal course of business of the Company;
- Direct or indirect contribution to political parties;
- Expenditure on item/s not in conformity with Schedule VII of the Companies Act 2013;
- Surplus arising out of CSR projects shall not form part of the business profits of the Company instead the same will be further used for CSR purposes only.

5. Area of Operations and beneficiaries

The Company will give preference to the local areas around its operations for spending the amount earmarked for CSR activities. The Company's operations will mainly be concentrated in the following areas:

- National Capital Territory of Delhi
- State of Haryana
- State of Uttar Pradesh
- Such area as may be recommended by the Board from time to time

6. Implementation mechanism

The company may conduct/implement CSR programs by itself or through registered trusts, societies, Institutions, foundations, section 8 (previously section 25) companies with an established track record of at least three years in carrying on activities in the related area/s or as suggested by Ministry of Corporate Affairs vide circulars/notifications from time to time. The progress will be reviewed by the Board of Directors in its meetings. The details of CSR programs undertaken by the Company will be reported in the Annual Report in the

format prescribed under the Companies (Corporate Social Responsibilities) Rules 2014 as amended from time to time.

7. Monitoring of CSR programs

The Managing Director will be responsible for the day-to-day management of CSR-related activities of the company. He will periodically report to the Board regarding the progress of CSR activities taken or/and to be taken. All projects undertaken by the Company will be monitored on a regular basis. On-site monitoring would also be undertaken at least once a year to ensure on-track implementation if required.

8. Effective Date

This amended CSR Policy will be effective from the date of its approval by the Board of Directors.

9. Amendments to the CSR Policy

CSR Policy may be updated to align it with the changing requirements or changes in the legal and regulatory framework. Any revision in the Policy shall be approved by the Board of Directors.

For Sultan Chand And Sons Private Limited

Sd-

Satish Agarwal

Managing Director

IN: 00774999

Sd-

Vivek Aggarwal

Whole Time Director

DIN: 00775054

Date of Approval by the Board: December 26, 2022

Place: New Delhi