Surin Automotive Private Limited

Policy on Corporate Social Responsibility

Preamble

It has been made mandatory by the Section 135 of the Companies Act, 2013 for the Company to formulate a Corporate Social Responsibility (CSR) Policy. The Policy is to be formulated by the Corporate Social Responsibility Committee and the Committee must recommend the same for the approval of the Board. Subsequently, the policy shall also be placed on the website of the Company.

Definitions

For the purposes of this policy

- "Act" shall mean the Companies Act, 2013 and shall include any amendments made thereto.
- "Average net profit" shall be net profit of the Company calculated in accordance with the provisions of section 198 of the Companies Act, 2013.
- "Corporate Social Responsibility activities or CSR Activities or Activities" shall mean the activities recognised for Corporate Social Responsibility as specified under the Schedule VII of the Companies Act, 2013 and shall include any additions or amendments made thereto.
- "Corporate Social Responsibility Committee or CSR Committee or Committee" shall mean a Committee of the Board of Directors of the Company constituted under provisions of Listing agreement and Companies Act, 2013.
- "Board" means Board of Directors of Surin Automotive P. Ltd.
- "Company or SAPL" shall mean Surin Automotive P. Ltd (SAPL)., wherever it is referred to in the policy.
- "Minimum spending requirement" shall mean the minimum amount to be spent on CSR activities as prescribed under section 135 of the Companies Act 2013, and the rules made thereunder.
- "Policy" shall mean the Policy on Corporate Social Responsibility of Surin Automotive P. Ltd.
- "Rules" shall mean the Companies (Corporate Social Responsibility Policy) Rules, 2014 and shall include any amendments made thereto.

The Policy

What CSR means to SAPL:

Corporate Social Responsibility (CSR) is central to the operating philosophy of the Company as it is the Company's constant endeavour to ensure that its businesses uphold the highest standards of governance and compliance.

CSR Activities:

The Company proposes to engage in one or more of the following CSR activities as per Annexure A.

Identification:

The Company has set up a CSR committee (Committee) for the purpose of identifying CSR projects and overlooking, supervising and providing guidance for their implementation. The Committee shall explore various areas and filter and shortlist projects for CSR activities and recommend them for the approval of the Board of Directors.

Implementation:

The Committee, with respect to implementation of the selected projects, among others, shall:

- a) At the beginning, study the project and assess the requirements and estimate the budget for the same.
- b) Evaluate the project and specify time lines for their completion.
- c) Set achievable short term, medium term and long term goals as required for each project.
- d) Draw up annual milestones for each project.
- e) Enter into partnerships with other agencies, NGOs or Companies, if required, to jointly undertake the CSR activities.
- f) Set up teams and assign them responsibilities with respect to the implementation of the projects.

Monitoring:

The Committee shall monitor the implementation of the CSR projects through quarterly reports and if required through field visits as well and periodically inform to the Board the details and progress of the implementation.

Budget and expenditure:

The Budget for the activities undertaken/ to be undertaken shall be evaluated by the committee and recommended to the Board of Directors for its approval. The sanction of the Budget shall be made by the Board and the amount spent shall also be in line with the minimum spending as per statutory requirements for the time being in force.

The expenditure on these activities shall include contribution to corpus for the projects approved by the Board on recommendation of the CSR committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Companies Act, 2013 or any statutory modification thereto for the time being in force.

Surplus from CSR activities:

Surplus, if any, arising from any of the CSR activities, projects or programmes shall not form part of the business profit of the Company.

Authority to make amendments:

The CSR Committee shall have the right to make recommendations to the Board with regards to any amendment to the policy and the Board shall have the power to make any amendments to the

Policy as it deems fit from time to time, provided that the Policy continues to be in line with the requirements under the Section 135 of the Companies Act and the Corporate Social

Responsibility policy rules made there under, for the time being in force.

Annexure A : CSR Interventions

CSR Programs	CSR Initiatives	Ref. Sr.No of Sch VII of Companies Act
Education	 Setting up and running educational institutions and hostels Setting up and running mid-day meal kitchens Training of teachers and headmasters Improving quality of education in existing schools Augmenting and supporting infrastructure in educational institutions Offering scholarships and financial assistance to needy and meritorious students Bridging drop-out children and mainstreaming them to formal schools Making adults functionally literate Developing educational material and methodologies Supporting and promoting co-curricular activities Advocacy of best practices Education for mainstreaming disabled children 	II / I
Health	 Setting up and running clinics and hospitals Running mobile medical vans and ambulances Organizing health camps Providing financial assistance and waivers for needy patients, on a case-to-case basis Providing family planning services Reducing infant and maternal mortality Preventing and treating communicable diseases like malaria, tuberculosis and HIV / AIDS Treating and rehabilitating persons with disabilities Working on adolescent and reproductive sexual health issues Promoting awareness about various health issues and generating demand for health services Undertaking and supporting research on health related issues Ensuring access to potable drinking water and hygienic sanitation 	I

CSR Programs	CSR Initiatives	Ref. Sr.No of Sch VII of Companies Act
Livelihoods	 Setting up and running skill development centres, industrial training centres, diploma and polytechnic institutes, community colleges, etc Sponsoring candidates for skill development and vocational training programmes offered at identified institutions Coaching candidates to appear for entrance examinations of different institutions Creating, training and supporting entrepreneurs Creating, training and supporting self help groups, federations, co-operatives, societies and similar institutions Building capacities of farmers on improved methods of agriculture and other allied sectors Developing water harvesting structures and irrigation facilities Supporting farmers with quality inputs, technical know-how and timely information Creating markets and marketing linkages for farm and forest based produce Undertaking and supporting research on agriculture and other allied sectors 	X
Development	 Rural development projects of building and maintaining community-based rural infrastructure like roads, bridges, culverts, drains, rural electrification, water infrastructure, community centres, youth clubs, etc. 	
Sports	 Constructing stadia and sports infrastructure Setting up and running academies and sports training centres Organizing sports tournaments and coaching camps for community Supporting sportspersons to participate in state, national and international events Offering scholarships and sports equipments to deserving sportspersons Promoting adventure sports Preserving and promoting indigenous sports Organizing leadership and motivational camps 	VII

CSR Programs	CSR Initiatives	Ref. Sr.No of Sch VII of Companies Act
Ethnicity	 Preserving and promoting tribal languages, scripts and literature Preserving and promoting fine arts and performing arts Preserving and promoting various aspects of folk and tribal cultures Organizing cultural events Restoring and renovating memorials, monuments and heritage structures Mainstreaming Particularly Vulnerable Tribal Groups (PVTGs) Undertaking and supporting research on anthropological and ethnic issues 	V
Environment	 Undertaking plantations and afforestation activity Promoting renewable sources of energy Recharging ground water levels Conserving biodiversity and supporting research, awareness and advocacy on issues related to biodiversity Promoting awareness about environmental issues 	IV
Disaster Relief	 Extending relief measures during times of natural disasters, anywhere in the country Undertaking and supporting rehabilitation measures post-disasters 	Different activities will be categorized differently
Support to Technology Incubators	Funding research projects at technology hubs for environmental and social sustainability	IX

The CSR Committee could, from time to time, recommend donating or making grants to the PM's fund or funds set up the State Governments or to non-profit organizations and other institutions whose activities are aligned with the company's CSR.