

SPARSH INDUSTRIES PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY



CORPORATE SOCIAL RESPONSIBILITY POLICY CONTEXT:

The Corporate Social Responsibility (CSR) activity encompasses the process by which an organisation develops and defines its relationships with stakeholders, ultimately contributing to the common good of society. The CSR initiatives focus on the holistic development of host communities and create social, environmental and economic value to society.

POLICY: The Company recognises that its business activities have a wide impact on the society in which it operates and an effective practice is required, giving due consideration to the interests of its stakeholders, including shareholders, customers, employees, suppliers, business partners, local communities and other organisations. The objective of this policy is to set guiding principles for carrying out CSR activities by the Company.

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. A brief outline of the company's CSR policy, including an overview of projects or programs proposed to be undertaken: -

The CSR activity covers the process by which an organisation develops and defines its relationships with the ultimate stakeholders contributing to the common good of society. The CSR initiatives focus on the holistic development of host communities and create social, environmental and economic value to society. The Company recognises that its business activities have a wide impact on the societies in which it operates, and an effective practice is required, giving due consideration to the interests of its stakeholders, including shareholders, customers, employees, suppliers, business partners, local communities and other organisations. To attain its CSR objectives, activities undertaken by the Company shall mean and include, but not be limited to: -

- i. 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.
- ii. Promoting education, including special education and employment-enhancing vocational skills, especially among children, women, the elderly and the differently abled and livelihood enhancement projects.
- iii. 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.
- iv. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining the quality of soil, air and water, including contribution to the clean Ganga fund set up by the Central Government for rejuvenation of river Ganga.

- v. 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;
- vi. Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents, including widows;
- vii. Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports
- viii. Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM Cares Fund) or any other fund set up by the central government for socio-economic development and relief and welfare of the scheduled caste, tribes, other backward classes, minorities and women;
- ix. (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government, and
- x. (b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defence Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR)' engaged in conducting research in science, technology, engineering and medicine aimed at promoting sustainable Development Goals (SDGs).
- xi. Rural development projects.
- xii. Slum area development
- xiii. Disaster management, including relief, rehabilitation and reconstruction activities.

CSR COMMITTEE:

CSR Committee of the Board, consisting of three directors, which has formulated and recommended to the Board a CSR Policy indicating the activities undertaken by the Company as specified in Schedule VII of the Companies Act

NAME	CHAIRMAN/MEMBER
Mr. Vijay Kumar Agarwal	Chairman
Mr. Prashant Agarwal	Member
Mr. Shishir Agarwal	Member

IMPLEMENTATION OF CSR ACTIVITIES: The Company will implement its CSR activities through such entity/organisation and on such locations as approved by the CSR Committee. The surplus arising out of the CSR Projects or programs, or activities shall not form part of the business profit of the Company.

SCOPE AND RESPONSIBILITIES OF CSR COMMITTEE: The responsibilities of the CSR Committee include:

- Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken.
- Recommending the amount of expenditure for the CSR activities.
- Monitoring CSR activities from time to time.
- CSR activity to be taken by the company in accordance with the policy and submit a report to the board on all CSR activities undertaken during the financial year.
- Preparation of financial outlay for CSR activities.

REVIEW AND REPORTING

The CSR Committee will review the philanthropic activities of the Company and will provide a progress update to the Board of Directors at such other intervals as deemed fit.

The Company will report, in the prescribed format as set out in the Rules, the details of CSR initiatives and activities of the Company in the Directors' Report and on the website of the Company, as required under the Act read with the Rules.

An impact assessment shall be undertaken by the Company; in case its average CSR obligation is Rs. 10 Crore or more in the three immediately preceding financial years, through an independent agency, of its CSR projects having outlays of Rs. 1 Crore or more, and which have been completed not less than one year before undertaking the impact study. The impact assessment report shall be placed before the Board and shall be annexed to the annual report on CSR.

Further, the amount to be spent on the aforesaid assessment shall not exceed five per cent (5%) of the total CSR expenditure for that financial year or Rs. 50 Lakhs, whichever is less.

MONITORING

1. Appropriate documentation and amendments of the CSR Policy, annual CSR activities, reports on execution by CSR Partner(s), and expenditures will be undertaken regularly, and the same will be available to the Board of Directors of the Company.
2. Initiatives undertaken on the CSR front will be reported in the Annual Report of the Company.
3. The CSR Committee and persons/entities authorised by it will conduct due diligence checks on the current projects/partners every quarter and report anomaly, if any, immediately.
4. Plan and publish an annual calendar of major events to strive for maximum participation of stakeholders.
5. In case of an ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation of amount and shall make modifications, if any, within the overall permissible time period.

PLANNING AND IMPLEMENTATION

1. The planning and implementation of the CSR projects/programmes shall be in accordance with the annual action plan as specified in this CSR Policy.
2. Identification of projects and the executing agency/NGO will be made, inter alia, by assessing the following:
 - a) Project Objectives
 - b) Baseline survey – As-is and To-be state basis, accordingly, the outcome of the project will be measured.
 - c) Implementation schedules – Timelines for milestones of the project will need to be prescribed and agreed upon
 - d) Responsibilities and authorities
 - e) Major results expected and measurable outcome, including the expenses/charges ratio as against the actual CSR spend.
3. If the Company decides to set up a Trust or Section 8 Company, or Society or Foundation or any other form of entity operating within India to facilitate implementation of its CSR activities in accordance with its stated CSR Policy, the following shall apply:
 - The Company would need to specify the projects/programmes to be undertaken by such an organisation, for utilising funds provided by it;
 - The Company shall establish a monitoring mechanism to ensure that the allocation is spent for the intended purpose only.
4. The Company may also conduct/implement its CSR programmes through Trusts, Societies, Entities or Section 8 companies operating in India, which are not set up by the Company itself, herein collectively referred to as ‘CSR Partner’ or ‘CSR Partner(s)’.
5. Every such entity shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar w.e.f. 1st April, 2021.
6. The Company may also collaborate with other companies for undertaking projects or programmes 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 programmes in accordance with these rules.
7. The Board shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it, and the Chief Financial Officer shall certify to the effect.

DISPLAY OF CSR ACTIVITIES ON THE WEBSITE

The Composition of the CSR Committee, and CSR Policy and the Projects approved by the Board shall be disclosed on the website of the Company for public access

AMENDMENTS TO THE POLICY

The Board of Directors, on its own and/or as per the recommendations of the CSR Committee can amend this Policy, as per the requirements as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Regulations on the subject as may be issued from relevant statutory authorities, from time to time.

As approved by the Board of Directors of the Company in their meeting held on 26th March, 2021

REPORT ON CSR PROJECTS APPROVED BY THE BOARD

[Sparsh Industries Private Limited “The Company”]

(CIN: U25199DL2009PTC189847)

1. PURPOSE OF THIS REPORT

This report gives a simple, year-wise picture of all Corporate Social Responsibility (CSR) projects that the Board of Directors has approved. This report is meant to be used internally and can also support the CSR disclosures made in the Annual Report and the Directors' Report.

2. YEAR-WISE LIST OF CSR PROJECTS APPROVED BY THE BOARD

The table below lists, for each financial year, the project(s) approved by the Board, the amount approved, the amount actually spent:

S. No.	Financial Year	Name of CSR Project / Activity	Name of Implementing Agency /Company itself	CSR Obligation (Rs.)	Amount Approved by Board (Rs.)	Amount Spent (Rs.)	Unspent Amount	Project Status
1	2019-20	for setting up a Senior Secondary School at HS-01, Sector-20, Gautam Buddha Nagar, U.P. to promote education	Shanti Devi Murlidhar Education Society (CSR R. No. CSR000057 05)	48,87,601.30	49,00,000	49,00,000	Nil	Ongoing Project
2	2020-21	for setting up a Senior Secondary School at HS-01, Sector-20, Gautam Buddha Nagar, U.P. to promote education	Shanti Devi Murlidhar Education Society (CSR R. No. CSR000057 05)	1,63,44,676.09	1,65,00,000	1,65,00,000	Nil	Ongoing Project
3	2021-22	for setting up a Senior Secondary School at HS-01,	Shanti Devi Murlidhar		3,00,00,000	3,00,00,000		Ongoing Project

S. No.	Financial Year	Name of CSR Project / Activity	Name of Implementing Agency /Company itself	CSR Obligation (Rs.)	Amount Approved by Board (Rs.)	Amount Spent (Rs.)	Unspent Amount	Project Status
		Sector-20, Gautam Buddha Nagar, U.P. to promote education	Education Society (CSR R. No. CSR000057 05)	2,85,65,997.64			Nil	
4	2022-23	Fixed Infrastructure used for Educational purpose to promote education	G.B Educational Society (CSR R. No.CSR000 05759)	32401850.65	2,00,00,000	2,00,00,000	Nil	Ongoing Project
		Construction of swimming pool For training to promote rural sports, nationally recognized sports, paralympic sports and olympic sports.	Sparsh Industries Private Limited (Direct)		25,00,000	25,00,000		Other than ongoing project
		Fixed Infrastructure used for Educational purpose to promote education	Shanti Devi Murlidhar Education Society (CSR R. No. CSR000057 05)		1,00,00,000	1,00,00,000	Nil	Ongoing Project
		TOTAL AMOUNT		3,24,01,850.65	3,25,00,000	3,25,00,000	Nil	
5	2023-24	Fixed Infrastructure used for Educational purpose in Gautam Buddha Nagar, U.P. to promote education	Shanti Devi Murlidhar Education Society (CSR R. No. CSR000057 05)		1,25,81,000	1,25,81,000		Ongoing Project
		Construction of	Sparsh		11,78,010	11,78,010		Other than

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