

**SURYA EXIM LIMITED**

Corporate Social Responsibility

## **Corporate Social Responsibility Policy**

### **A. Introduction**

The Board of Directors (the "Board") of Surya Exim Limited (the "Company") has adopted the following Policy and Procedures with regard to Corporate Social Responsibility. The Board may review and amend this policy from time to time subject to the recommendations of Corporate Social Responsibility Committee.

### **B. Key Words and Meanings**

- **Act** - means the Companies Act, 2013 as amended from time to time.
- **CSR** - means Corporate Social Responsibility.
- **CSR Policy** - means the policy approved by Board as the Corporate Social Responsibility Policy of the Company as amended from time to time.
- **CSR Rules or Rules** - means Companies (Corporate Social Responsibility Policy) Rules, 2014.

### **C. Policy Objective & Philosophy**

The objective of the CSR Policy ("Policy") is to lay down the guiding principles in undertaking various programs and projects by or on behalf of the company relating to Corporate Social Responsibility ("CSR") within the meaning of Section 135 of the Companies Act, 2013 read with Schedule VII of the Act and (Corporate Social Responsibility Policy) Rules, 2014 (the "CSR Rules") with any amendment(s) thereof.

### **D. Constitution of CSR Committee**

The Board of Directors of Surya Exim Limited have formed a Corporate Social Responsibility Committee (the "CSR Committee") in line with Section 135 of the Companies Act, 2013 (the "Act").

The CSR Committee's members are:

- Mr. Bhalesh Mehta, Independent Director & Chairman of CSR Committee
- Mr. Jagdish Prasad Saboo, Managing Director of the Company
- Mrs. Archana Saboo, Whole-Time-Director of the Company

The CSR Committee will carry out the following functions:

- To formulate and recommend to the Board, a CSR policy indicating activities to be undertaken as specified in Schedule VII of the Act;
- Review the progress of CSR projects already undertaken by the Company and the utilization of budgets for each such projects.
- To recommend the amount of expenditure to be incurred on the activities referred to in sub-paragraph (i) above; and
- To monitor the CSR policy from time to time.
- To carry out such other functions as may be delegated to it by the Board relating to CSR activities of the company.

#### **E. CSR Projects, Programs And Activities**

In accordance with the CSR objective & philosophy and the specified activities under the Act read with Companies (Corporate Social Responsibility Policy) Rules, 2014 (the “CSR Rules”), and any amendment(s) thereof, the CSR activities of the Surya Exim Limited will have the following thrust areas:

- i. To contribute to the Trust or registered society which helps in the Medical assistance to the Poor people;
- ii. To contribute to the registered trust or registered society and to promote education especially Girls Education and to improve their quality of life;
- iii. To Contribute to the registered trust or society which launch integrated development programs for empowerment and mainstreaming of the rural socio-culturally oppressed and economically exploited masses;
- iv. To carry out any other activities or projects undertaken within the broad framework of Schedule VII of the Companies Act, 2013.

#### **F. Manner of undertaking CSR Activities/Implementation**

The CSR activities would be undertaken in the best possible manner to ensure that the amount spent is utilized for the benefit of target people in the most effective manner. The CSR activities shall be carried out in any of the following ways as the CSR Committee in its absolute discretion may decide. The CSR Committee may decide to use any one or all or a combination of any of the following ways to undertake the CSR activities/ projects/ programmes:

- a. Directly by the Company through its personnel.

- b. Through Implementing Agencies
- c. Through Surajidevi Rameshwarlal Badrinarayan Saboo Charitable Trust, a trust registered under the Bombay Public Trusts Act, 1950.
- d. Through any other registered trust/any registered society/any other company/organization that are qualified for undertaking CSR activities in terms of the provisions of the Companies Act, 2013 and have proven track record and possessing core competencies to undertake such activities.
- e. By participating in the CSR Schemes (of the nature as prescribed in Schedule VII of the Act) as prescribed under Section 35 of the Income-tax Act.

### **G. Monitoring/CSR Reporting**

- Implementation Schedule for each CSR activity/project/program shall be approved by the CSR Committee.
- The CSR Committee will follow stringent monitoring of the progress of the CSR activities and will establish a Management Information System to monitor the progress of the project, utilization of amount and benefits delivered to and realized by the target people.
- A report on periodic basis, as may be desired by the Board, shall be provided to the Board.
- The CSR Committee will review the Policy from time to time based on changing needs and aspirations of the target beneficiaries and make suitable recommendations as may be necessary and recommend to the Board for approval.

### **H. CSR Expenditure**

CSR expenditure will include all expenditure as may be permitted under the applicable laws, including contribution to corpus for CSR Programs approved by the Board on the recommendation of its 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 Act

### **I. Area of Operation for CSR**

The area of operation for undertaking CSR activities will be restricted to the territorial jurisdiction of India.

**J. Treatment of Surpluses**

Any surplus generated from CSR projects/ programs undertaken by us will be tracked and channelized into our CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.

**K. Reporting**

The Board's Report of the Company to include an annual report on CSR containing particulars specified in the annexure to the rule pertaining to a financial year commencing from April 1, 2014.

**L. Disclosures**

The contents of the approved CSR Policy shall be disclosed in the Board's Report and displayed on the Company's website.