



CORPORATE SOCIAL RESPONSIBILITY (“CSR”) POLICY

SRIMAN MADHWA SIDHANTAONNAHINI PERMANENT NIDHI LIMITED

Policy Effective Date: 25/01/2025



CSR Policy

1. BACKGROUND:

- 1.1. In compliance with the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, the Company is, inter alia, required to:
- (i) Formulate a Corporate Social Responsibility (CSR) Policy, monitor the CSR activities of the Company from time to time.
 - (ii) 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 CSR Policy.
- 1.2. The Policy is approved and established by the Board with effect from 25/01/2025 and shall continue in force until the termination by the Board.

2. DEFINITION/INTERPRETATION:

In this Policy:

Term / Abbreviation	Definition / Expansion
Board	The Board of Directors of the Company, as constituted from time to time.
Company	Sriman Madhwa Sidhantaonnahini Permanent Nidhi Limited
CSR	Corporate Social Responsibility
Policy	CSR Policy

3. SCOPE OF CSR FOR THE COMPANY:

- 3.1. Projects undertaken by the Company over and above normal course of business and within the ambit of core areas are classified as CSR activities/projects.
- 3.2. Corporate Social Responsibility Projects ("**CSR Project**") shall mean and include all programs, projects, activities, health camps, contribution to relief funds, charitable donations, and education grants, sponsorships that contribute to the overall sustainable development of local communities and thereby helps in welfare of the society at large.



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4. CORE CSR AREAS IDENTIFIED BY THE COMPANY FOR CSR (“CSR AREAS”):

Section 135 of the Companies Act, 2013 and Rules made thereunder stipulates that the CSR Projects must fall within the purview of Schedule VII of the Act. In accordance with the statutory requirements and keeping the Company philosophy at priority, the Board identified the following thrust areas in line with our CSR goals:

The following is the list of CSR projects or programs which the Company may undertake pursuant to Schedule VII of the Companies Act, 2013:

- I. Eradicating hunger, poverty and malnutrition, promoting healthcare, sanitation and making available safe drinking water;
- II. Promoting education, including special education, and employment enhancing vocation skills especially among children, women, 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 centers 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, agro forestry, conservation of natural resources and maintaining quality of soil, air and water;
- 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 arts and handicrafts;
- VI. Measures for the benefit of armed forces veterans, war widows and their dependents;
- VII. Training to promote rural sports, nationally recognized sports, Para-Olympic sports and Olympic sports;
- VIII. 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, other backward classes, minorities and women;
- IX. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- X. Rural development projects;
- XI. Slum area development
- XII. Any other measures with the approval of Board of Directors subject to the provisions of Section 135 of Companies Act, 2013 and rules made there-under.



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5. CORPORATE SOCIAL RESPONSIBILITY COMMITTEE:

- 5.1. Pursuant to the provision of Section 135 (9) of the Companies Act, 2013, the Company is not required to constitute Corporate Social Responsibility Committee.
- 5.2. However, the Board may constitute the Committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The Committee shall exercise powers and perform the functions assigned to it by the Board of the Company pursuant to section 135 of the Companies Act, 2013 and CSR Rules notified with regard thereto.

6. RESPONSIBILITY OF THE BOARD OF DIRECTORS:

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

- a. To approve the CSR Policy & disclose the contents of such policy in its report and also place it on the Company's website;
- b. Ensure that the activities proposed in the CSR Policy are undertaken;
- c. Ensure that the company spends, in every financial year, at least 2% of 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;
- d. If company fails to spend the sum as mentioned above, then the Board shall, in its Report specify the reasons for not spending the amount.

7. IDENTIFICATION OF ACTIVITIES/PROJECTS:

Out of approved CSR activities, the Board shall decide which activity/project should be given priority for the respective financial year. While arriving at the decision of the activity to be undertaken for the respective year, the Board shall analyse the basic need of the community/ area in which the Organization operates or at the place where its registered office is situated.

8. IMPLEMENTATION MECHANISM:

- 8.1. The company may conduct / implement CSR programs by itself and/or through registered trusts, societies and / or 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.
- 8.2. The company may collaborate or pool resources with other companies to undertake CSR activities and any expenditure incurred on such collaborative efforts would qualify for computing the CSR spending.



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- 8.3. The progress will be reported to the Board during the Board meetings.
- 8.4. The progress on CSR programs undertaken by the Company will be reported in the Annual Report in the format prescribed by the CSR Rules 2014.

9. MONITORING BY THE BOARD:

The Board may review the Policy from time to time as may be required, subject, however, to the condition that such alterations shall not be inconsistent with any provision of any law for the time being in force.
