



CORPORATE SOCIAL RESPONSIBILITY POLICY OF SADBHAV ENGINEERING LTD.
(Approved by Board of Directors at their meeting held on 13.10.2014)

Corporate Social Responsibility (CSR)- Philosophy :

Sadbhav Engineering Ltd.(SEL) recognizes that as an infrastructure development company, operations have an impact on society and on the environment. In addition to ensuring that operations are conducted efficiently and in a manner that meets governmental environmental standards, the Company is committed in ensuring that the communities where it operates also benefits and develops together.

The Sadbhav Group, including SEL, have an intention to actively participate in the development of the communities where projects are located, which contributes to social and political stability in the areas where it operates.

With the advent of the Companies Act, 2013 constitution of a Corporate Social Responsibility Committee of the Board and formulation of a Corporate Social Responsibility Policy became a mandatory requirement. Therefore, the Company has formulated a CSR Policy which encompassed its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs for the welfare & sustainable development of the society.

CSR Activities

The Company will select one or more of the following CSR activities for implementation in the area of its operation, namely :

- (i) eradicating hunger, poverty and malnutrition, promoting 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;
- (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 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 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 arts and handicrafts;

- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (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 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.

Note :

1. Contribution of any amount directly or indirectly to any political party under section 182 of the Act, shall not be considered as CSR Activity/Expenditure.
2. CSR Activities undertaken in pursuance of the normal course of business of the Company and CSR Activities which benefit only the employee of the company and their family shall not be considered as CSR Activity.

The Geographical Reach :

The Companies Act, 2013 provides that the Company shall give the preference to the local area or areas around where it operates, for spending the amount earmarked for Corporate Social Responsibility. However the Committee may identify such areas other than stated above, as it may deem fit and recommend it to the Board for undertaking CSR activities.

Implementation:

The Company shall implement CSR activities by following means :

1. Company may itself implement the CSR activities within the scope and ambit the CSR activities defined in this the policy.
2. Company may implement the CSR activities through a registered trust or a registered society or a company established by the Company or its holding or subsidiary or associate company under section 8 of the Act or otherwise :

Provided that :

- i. If such trust, society or company is not established by the Company or its holding or subsidiary or associate company, it shall have an established track record of three years in undertaking similar programs or projects;
 - ii. The company has specified the project or programs to be undertaken through these entities, the modalities of utilization of funds on such projects and programs and the monitoring and reporting mechanism.
3. Company may also collaborate with other companies for undertaking projects or programs 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 programs in accordance with Companies (Corporate Social Responsibility Policy)Rules, 2014.

Fund Allocation

1. The Company, in every Financial Year, shall endeavor to spend such feasible amount as CSR Expenditure, which shall not be restricted by the statutory limit of a specified percentage of its average net profits of the immediately preceding three Financial Years. However, the aforementioned CSR Expenditure in any Financial Year shall be atleast 2% of Company's average Net profits for the three immediately preceding Financial Years.
2. Total CSR expenditure shall be approved by the Board upon recommendation by the CSR Committee
3. In case the Company fails to spend the statutory minimum limit of 2% of Company's average net profits of the immediately preceding three years, in any given financial year, the Board shall specify the reasons for the same in its report in terms of clause (o) of sub-section (3) of section 134 of the Act.

Monitoring Mechanism

1. CSR Committee shall monitor the CSR Policy and CSR Activities. For this purpose, the CSR Committee shall meet at such intervals as it may deem fit.
2. Initiatives undertaken on the CSR front will be reported in the Annual Report of the Company.
3. CSR Committee shall ensure that the CSR Policy is displayed on the Company's website

Others

- 1 Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company.
- 2 Company may built CSR capacities of their own personnel as well as those of their Implementing agencies through Institutions with established track records of at least three financial years but such expenditure shall not exceed five percent of total CSR expenditure of the Company in one financial year.

Amendment:

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this Policy as and when required 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.

Interpretation

Any word used in this policy shall have the same meaning ascribed to it in the Companies Act, 2013 or Rule made thereunder, Listing Agreement, Accounting Standards or any other relevant legislation/law applicable to the Company.