

**S. MARK ENGINEERING (I) PRIVATE LIMITED**

CIN: U74999GJ2017PTC098829

Committee of CSR

Sr No.	Name of the Member	Designation
1.	Avinashchandra Buadass Saini	Chairman and Director
2.	Rahul Saini	Member & Director
3.	Vas Dev Kalia	Member & Director

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POLICY ON CORPORATE SOCIAL RESPONSIBILITY (CSR)

Preamble:

- This policy, which encompasses the Company's philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large.
- The aim of the Corporate Social Responsibility Policy (CSR Policy) is to ensure that it becomes a socially responsible Corporate Entity contributing towards improving the quality of life of the Society at large.
- This policy shall apply to all CSR initiatives and activities to be undertaken by the Company independently or any Group Company or any NGO or through a registered public charitable trust.

CSR Activities:

In accordance with the requirements under the Companies Act 2013 and the rules made thereunder, S. MARK ENGINEERING (I) PRIVATE LIMITED CSR activities, amongst others, will focus primarily on Primary Education, Healthcare and Sustainable Livelihood. Activities proposed to be carried out by the Company including through Charitable Trust for fulfillment of our CSR vision would include the following:

- a. To start, run, maintain and/or construct day care for senior citizens and conduct other ancillary activities to engage such citizens and provide them with platforms to conduct their life independently.
- b. To start, run, maintain and/or construct/develop "Balwadis", primary and secondary schools, colleges, boarding houses, adult education schools, night schools, coaching classes including creation of all facilities for the same, any special project on education, empowerment of women for education/health and self-employment.
- c. To establish, maintain and run health related institutions, Yoga Activities, camps for medical check-up, diagnosis, and treatment of diseases, to start a blood bank, to start medical centers, to give medicines to the needy and perform surgical operations or extend monetary help for the same, to start and / or assist medical and educational research centers, to grant scholarships, prizes and other rewards relating to the said fields.



- d. To hold, arrange and organize meetings, lectures, talks, discussions, seminars, symposia, conferences, competitions, research, and study visits, tours, excursions, exhibitions, debates, cinema, audio-visual programmes, artistic performances, and other cultural activities, sports, and games.
- e. Establishment, maintenance and provide support for establishment of libraries, museums, and reading rooms, and distribution of books etc. for advancement of education and knowledge in general.
- f. Advancement of any other object of general public utility, and relief like conducting seminars on educational advancement, providing necessary assistance including Disaster Management assistance during natural calamities and such other assistance as may be required from time to time.
- g. For giving medical aid and relief, including establishment, maintenance and support of hospitals, dispensaries, clinics and other similar activities.
- h. For relief of the poor, including establishment, maintenance and support of the institutions having similar objects.
- i. Water Supply including drinking water
- j. Adoption of Village for carrying out the activities like infrastructural development e.g. Road, Water Supply, Electricity and Community Center, Collection of old clothes and distribution of the same in the nearby village etc.
- k. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art.

Activities relating to:

- I. Eradicating extreme hunger and poverty
- II. Promotion of education
- III. Promoting gender equality and empowering women
- IV. Reducing child mortality and improving maternal health
- V. Combating human immune-deficiency virus, acquired immune deficiency syndrome, malaria and other deceases.
- VI. Ensuring environment sustainability
- VII. Employment enhancing vocational skills
- VIII. Social business projects
- IX. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and funds for the welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women and
- X. Such other matters as may be prescribed by the Central Government under the Schedule VII to the Companies Act, 2013 (including rules/circulars issued thereunder) or any amendments thereto.
- XI. And all other charitable activities for the benefit of public at large.



The approach of Company towards CSR will be oriented to identify and formulate projects in response to the need of society and to implement them with full involvement and commitment in a time bound manner. To take all reasonable steps for fulfilment of projects to be undertaken as a part of CSR activities and to provide all the facilities which are required for the targeted beneficiaries. CSR Policy and initiatives/activities there under will be based on Social Commitment and necessarily be community oriented with focus on an integrated, overall, inclusive, equitable and collective approach.

The CSR Policy will aim at socio-economic development schemes with the primary goal of ensuring that benefits reach the targeted beneficiaries. CSR activities/programmes to be undertaken shall be in line with approved guidelines of the Ministry of Corporate Affairs.

Implementation

- The CSR activities shall be undertaken by the company, as per its stated CSR Policy, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business.
- Keeping in line with Section 135 of the Companies Act 2013 and the rules made thereunder, the Company has constituted CSR Committee under the chairmanship of an Independent Director which has formulated and recommended the CSR Policy to the Board of Directors, and henceforth shall recommend the amount of expenditure to be incurred on CSR activities every year in lines with the statutory provisions and monitor the implementation of the CSR policy periodically.
- CSR projects or programs or activities shall be undertaken in India Only.
- CSR projects or programs or activities shall be for the benefit of the public at large excluding the employees of the Companies.

Funding and Allocation

For achieving its CSR objectives through implementation of meaningful & sustainable CSR programs/projects/Activities, Company will allocate atleast 2% of average Net Profit of the immediately preceding three financial years, as its Annual CSR Budget, or as stipulated in the relevant statute from time to time.

Any unspent/unutilized CSR allocation of a particular year, will be carried forward to the following year. Any surplus arising out of the CSR Projects or Programs or activities shall not form the part of the Business profit of the Company.



Utilization of Fund

From the allocated Fund, the annual CSR Budget will determine the activities to be undertaken under CSR for the scope of activities prescribed in CSR policy (as amended from time to time). Any expenditure not budgeted may be incurred if approved by the CSR Committee.

Monitoring and Feedback

To ensure effective implementation of the CSR projects/ programs/activities undertaken at work center, a monitoring mechanism shall be put in place by the work center head. The progress of the CSR projects/ programs/activities under implementation shall be reported to the CSR Committee on periodic basis.

Appropriate documentation of any change in Company's CSR Policy, annual CSR activities conducted, executing agencies, and expenditure entailed shall be undertaken on a regular basis.

CSR initiatives of the Company shall also be reported in the Annual Report of the Company as required by the statutory provisions applicable.

General

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines/Rules on the subject as may be issued by the Government from time to time.

CSR Committee of the Company shall have power to revise/amend the CSR Policy in line with changing needs and aspirations of the target beneficiaries and make the suitable modifications as may be necessary.