CORPORATE SOCIAL RESPONSIBILITY POLICY

(CSR POLICY)

OF

SAMAY PROJECT SERVICES LIMITED

APPLICABILITY:

SAMAY PROJECT SERVICES LIMITED (the 'Company') has developed its Corporate Social Responsibility Policy (the 'Policy') in accordance with section 135 of the Companies Act 2013 and the rules made there under.

This policy encompasses the company's commitment to create large environmental and societal value as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programs for the welfare & sustainable development to the community at large.

The Policy shall apply to all CSR programs of the Company.

PHILOSOPHY:

Corporate Social Responsibility (CSR) is a public-spirited cause that has been well introduced by the new Companies Act 2013. Through the CSR there is a formation of a dynamic relationship between a company on one hand and the society and environment on the other. CSR is traditionally driven by a moral obligation and philanthropic spirit which resonates with the policy of the Company

OUR VISION:

The core vision of the Company's CSR policy is to create a meaningful and a lasting contribution to the society from which it draws its resources by extending helping hand to the needy and the underprivileged through social projects.

Corporate Social Responsibility is the commitment of business to contribute for economic development that is sustainable, facilitating greater and more inclusive prosperity. It is the contribution of the corporate sector for philanthropic causes like education, health, water, environment and community welfare.

OBJECTIVE OF THE CSR POLICY:

- To ensure that the Company is committed to operate its business in an economically, socially and environmentally sustainable manner, while recognizing the interests of all its stakeholders.
- To take up programmes that benefit the communities in and around its work centres and over a period of time, results in enhancing the quality of life of the people in the area of its business operations.
- To generate a community goodwill for the Company and help reinforce a positive and socially responsible image of Company as a good corporate citizen of the Country

RESPONSIBILITIES OF THE BOARD:

The Board of Directors of the Company will be responsible for:

- Approval of the CSR Policy of the Company.
- Disclosing the content of the Policy in its report and place the Policy on the Company's website in such a manner as prescribed under Section 135 of the Companies Act 2013 read with the CSR Rules.
- Ensuring that the social projects included in the Policy are undertaken by the Company.
- Ensuring that the Company spends, in every financial year, atleast 2% of the average net profits of the Company made during the three immediately preceding financial years in pursuance of the Policy.
- Ensuring that it specifies the reasons in its report for not spending the earmarked amount in case the Company fails to spend such amount

CORPORATE SOCIAL RESPONIBILITY COMMITTEE

COMPOSITION:

The Corporate Social Responsibility Committee ('CSR Committee') shall consist of three or more Directors amongst whom at least one shall be an Independent Director. The Committee may formulate a CSR Sub-Committee with such other Directors / Executives of the Company from time to time as it may deem necessary and expedient. The Company Secretary shall act as the Secretary to the Committee.

MEETINGS:

The Committee shall hold meeting as and when required, to discuss various issues on implementation of the CSR Policy of the Company. The members would strive to hold at least two meetings in a financial year.

The Committee shall periodically review the implementation of the CSR Programmes and issue necessary direction from time to time to ensure orderly and efficient execution of the CSR programmes in accordance with this Policy. It would be the responsibility of the CSR Committee to periodically keep the Board apprised of the status of the implementation of CSR activities.

ROLE OF CSR COMMITTEE:

a) To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013 (as amended from time to time).

b) To recommend the amount of expenditure to be incurred on the activities in a financial year.

c) To monitor the Corporate Social Responsibility Policy of the company from time to time.
d) Any other matter/thing as may be considered expedient by the Members of the Committee in furtherance of and to comply with the CSR Policy of the Company ▪ Form a CSR Committee and disclose the composition of the CSR Committee.
▪ Approve the CSR Policy after taking into account the recommendations made by the CSR Committee.
▪ Place the CSR Policy on the Company's website.
▪ Ensure implementation of the activities under CSR
▪ Ensure expenditure of requisite amount on CSR every year as per law.

RESPONSIBILITIES OF THE CSR COMMITTEE:

- Formulate and recommend the CSR Policy to the Board for approval. The Committee shall indicate the projects to be undertaken by the Company as specified in Schedule VII.
- Monitor the Policy from time to time and recommend changes to the Board.
- Recommend the amount of expenditure to be incurred on CSR projects.
- Institute a transparent monitoring mechanism for ensuring implementation of the social projects undertaken by the Company

AREAS OF CSR PROGRAMS/PROJECTS:

The Company's areas of focus will align with Schedule VII of the Companies Act, 2013 and

(i) eradicating hunger, poverty and malnutrition, promoting health care including 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 provision for infrastructure improvements in the school, colleges and enhance the learning environment for students, 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 setup 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) measure for the benefit of armed force 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 recognized sports, Paralympic sports and Olympics sports;

(viii) contribution to the Prime Minister’s National Relief Fund or Prime Minister's Central 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 Castes, the Schedule 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

(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 Defense 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).

(x) rural development projects.

(xi) slum area development.

(xii) disaster management, including relief, rehabilitation and reconstruction activities.

CSR BUDGET:

The Board shall ensure that the company spends at least 2% of its average Net Profits calculated as per Sec-198 of the Companies Act, 2013, as its Annual CSR Budget in each Financial Year to be incurred on identified areas.

Allocation of the Annual Budget for CSR activities in any given year shall be as per the provisions of the Companies Act 2013 and rules made thereof as amended from time to time.

IMPLEMENTTION PROCESS:

- The Company's projects will be implemented in a time-bound manner with clear objectives, plan, targets and robust monitoring and evaluation mechanisms.
- The mode of implementation of project activities identified under CSR include a combination of direct implementation by the Company under Approved Projects or through specialized agencies, which could include the Trust of the Company, Voluntary Organizations (NGO's), Recognized Institutes /Academic Institutions, Trusts, Registered Societies, Business Partners, Self Help Groups, Mahila Mandals, Professional Consultancy organization etc.
- For CSR projects, the timeframe and periodic milestones should be finalized at the time of approval of the Project.
- The Company will use services of expert agencies, consultancy firms etc. wherever required for carrying out base line surveys, guidance on project design and implementation, impact assessment surveys etc.
- For CSR projects, the timeframe and periodic milestones should be finalized at the time of approval of the Project.

PROJECT MONITORING:

The Company will institute a well-defined monitoring and evaluation mechanism to ensure that each social project has:

- Clear objectives developed out of the societal needs that are determined through baseline studies and research.
- Clear targets, timelines and measurable parameters wherever possible.
- A progress monitoring and reporting framework that is aligned with the requirements of section 135 of the Companies Act and the CSR Rules.

BUDGET MONITORING:

The Company will establish an accounting system to ensure project wise accounting of CSR spends.

REPORTING FRAMEWORK:

- The Company will monitor progress on CSR projects and CSR spend and report to the management annually.
- The Company will report CSR performance in its annual report as per the structure and format prescribed in the notified CSR Rules.

GENERAL:

- Words and expressions used but not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, the CSR Rules made thereunder or in any amendment thereto. This Policy shall also be subject to such clarifications and FAQs as may be issued by MCA from time to time.
- In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference should be made to CSR Committee and in all such matters, the interpretation & decision of the CSR Committee shall be final.
- Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from the Government, from time to time.
- The Company reserves the right to modify, cancel, add, or amend any of these Rules.

The Board will review the policy from time to time based on changing needs and aspirations of the target beneficiaries and make suitable modifications, as may be necessary.