

Corporate Social Responsibility Policy

A. PREFACE:

Corporate Social Responsibility (CSR) is the way and means through which the Corporates can repay the obligations made by the Society by contributing the resources in its various forms as required for the efficient operation of the Business. The Corporate Social Responsibility is strongly connected with the principles of sustainability. Organizations should make decisions based not only on financial or operational factors but also on the social and environmental consequences. Therefore, it is the core corporate responsibility of SOGEFI ADM SUSPENSIONS PRIVATE LIMITED to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

B. CSR POLICY:

This CSR Policy encompasses SOGEFI ADM SUSPENSIONS PRIVATE LIMITED's philosophy for social responsibilities and lays down the guidelines and mechanism for undertaking projects, programs, and activities towards such responsibilities.

C. VISION STATEMENT AND OBJECTIVE:

1. The CSR Policy sets out SOGEFI ADM SUSPENSIONS PRIVATE LIMITED's commitment to ensuring that our activities extend beyond business and include initiatives and endeavors for the benefit and development of the community and society. The CSR Policy lays down guidelines for undertaking programmes geared toward social welfare activities or initiatives. Through this CSR Policy, we propose to adopt the CSR Activities mentioned below:
2. In alignment with the above vision, SOGEFI ADM SUSPENSIONS PRIVATE LIMITED, through CSR Activities, will endeavor to enhance value creation in society and in the community, through its services, conduct initiatives, to promote sustained growth for the society and community, in fulfillment of its role as a socially responsible corporate.

3. The **objective** of this CSR Policy is to:
 - a. Define governance structure for CSR management within the Company.
 - b. Serve as a guiding document aiding in the identification, execution, and monitoring of the CSR projects.
 - c. Describe the treatment of surpluses from CSR activities.
 - d. Define the approach and direction given by the Board of the Company, taking into account the recommendations of the CSR Committee
 - e. Provide guiding principles for the selection, implementation, and monitoring of activities
 - f. Formulate an Annual Action Plan every year as per applicable rules.
 - g. Monitor the process to be followed for such projects, programs, and activities.

D. ALIGNMENT WITH SOGEFI ADM SUSPENSIONS PRIVATE LIMITED VALUES:

We believe in driving our CSR policy with the same values that direct SOGEFI ADM SUSPENSIONS PRIVATE LIMITED. Hence, this CSR Policy absorbs SOGEFI ADM SUSPENSIONS PRIVATE LIMITED's core values and is aligned in the following manner with its CSR strategy:

1. **Being Accountable for what we do:** SOGEFI ADM SUSPENSIONS PRIVATE LIMITED considers itself accountable for contributing back in a meaningful way to the society/ Nation.
2. **Embrace Diversity & Inclusion:** SOGEFI ADM SUSPENSIONS PRIVATE LIMITED believes in embracing diverse views and opinions which leads to a better solution. Accordingly, for the execution of its CSR objectives, SOGEFI ADM SUSPENSIONS PRIVATE LIMITED plans to partner, where necessary, with NGOs/ other charitable organizations to meet the CSR objectives.
3. **Collaborate to Win:** Collaborating with other NGOs/ charitable organizations, with footprint/ expertise in areas selected, is a key aspect of SOGEFI ADM SUSPENSIONS PRIVATE LIMITED's strategy to make a positive impact in its CSR activities.

E. APPLICABILITY:

CSR Policy applies to SOGEFI ADM SUSPENSIONS PRIVATE LIMITED, which is mandated with the CSR expenditure obligations as per Section 135 of the Companies Act, 2013 ('the Act') read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

F. SCOPE OF CSR POLICY:

This Policy applies to all CSR projects that will be undertaken by SOGEFI ADM SUSPENSIONS PRIVATE LIMITED and shall fulfill all the requirements of Section 135 of the Companies Act, 2013 and rules made thereunder. SOGEFI ADM SUSPENSIONS PRIVATE LIMITED shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act, 2013. This Policy will be annually reviewed and updated in line with the relevant codes of legislation and best practices that can be adopted by SOGEFI ADM SUSPENSIONS PRIVATE LIMITED.

G. GOVERNANCE STRUCTURE:

A governance structure at SOGEFI ADM SUSPENSIONS PRIVATE LIMITED is responsible for implementing and administering CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013 and rules made thereunder. The Board of Directors of the Company is ultimately accountable for the CSR projects undertaken by SOGEFI ADM SUSPENSIONS PRIVATE LIMITED.

H. CSR COMMITTEE:

The Company's CSR Obligation is less than 50 lacs, thus for now it is not mandatory to form and constitute a Corporate Social Responsibility Committee (hereinafter referred to as "the CSR Committee"). As and when required SOGEFI ADM SUSPENSIONS PRIVATE LIMITED shall constitute a CSR Committee at the Board level.

I. ROLE OF THE BOARD:

1. Ensure that the CSR activities included in this Corporate Social Responsibility Policy are undertaken by the Company.
2. The Company may decide to undertake its CSR activities approved by the Board, through a registered trust or a registered society or a Company established under section 8 of the Act by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, or otherwise provided that
 - If such trust, society or company is not established by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, it shall have an established track record of three years in undertaking similar programs or projects/activities;
3. Ensure that in each financial year the Company spends at least 2% of the average net profits of the company made during the three immediate preceding financial years, calculated in accordance with Section 198 of the Act, in pursuance of its CSR policy. Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the Company where it operates.

J. STRUCTURE FOR CONDUCTING CSR:

1. The Company shall undertake the CSR activities by itself or through Implementing agency such as registered trusts or society or through a Section 8 Company registered under Companies Act, 2013. The implementation agencies shall be selected after undertaking a due diligence process of identification, design, budgeting and project development.
2. The Company may also directly undertake the CSR activities.
3. The Company also may conduct CSR through
 - a. Registered trust, or
 - b. Registered society, or
 - c. Company under section 8 of the Act i.e. non-profit organization
 - d. Or any other entity permitted under the legislation, to execute CSR projects

Further to that the Company may also collaborate with our other Companies to undertake the CSR activities.

K. CSR ACTIVITIES FOR IMPLEMENTATION:

CSR Policy relates to the activities to be undertaken by the Company as specified in Schedule VII to the Act and the expenditure thereon, excluding activities undertaken in pursuance of the normal course of business of a company.

1. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation, including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
2. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
3. 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.
4. 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.
5. 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 art and handicrafts;
6. measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
7. training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
8. contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women.
9. 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 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).]

10. rural development projects
11. slum area development.
12. disaster management, including relief, rehabilitation and reconstruction activities.

The following activities shall not be considered under the CSR activities.

1. Activities that benefit only the employees of the Company and their families.
2. Activities undertaken outside India.
3. Contribution of any directly or indirectly to any political party of the Act.
4. Activities which are undertaken in pursuance of the normal course of business of the Company

L. FUNDING, SELECTION AND MONITORING:

The Board will earmark an annual CSR Budget (as prescribed by the Act) to implement CSR initiatives. Any unspent or unutilized CSR allocation in a particular year will be carried forward to the following year; the CSR Budget will be non-lapsable in nature. The CSR Committee or the Implementing Agency may seek or receive proposals from eligible NGOs, selecting proposals based on established corporate criteria and areas of interest. Further, as required by the Act, an MOU will be signed with the NGO/s to implement approved CSR programs.

The Implementing Agency will monitor all CSR programs to ensure effective and efficient utilization of deployed resources and to achieve the established targets within a stipulated time frame and report to the Board as mutually decided. An annual CSR program report will be prepared by the Implementing Agency. This report will be incorporated in the Board's Report (as per the format specified in the Act) and communicated to appropriate authorities and stakeholders.

M. CSR EXPENDITURE

The CSR activities undertaken in India only shall amount to CSR Expenditure. CSR Expenditure shall include all expenditures for CSR activities approved by the but does not include any expenditure on an item not in conformity or not in line with activities that fall within the purview of Schedule VII of the Act.

N. TREATMENT OF SURPLUS:

Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be put back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within such period and with such terms and conditions as may be prescribed under Section 135 of the Act read with relevant rules applicable.

O. TRANSFER OF UNSPENT CSR AMOUNT:

Until a fund is specified in Schedule VII for the purposes of subsection (5) and (6) of Section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in Schedule VII of the Act.

P. DISCLOSURE OF THE POLICY:

The CSR Policy on being approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

Q. CSR REPORTING:

The Board, based on reports presented by the CSR Team, will annually publish reports on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act 2013 and rules made thereunder. The Board shall also submit a responsibility statement.

R. AMENDMENT:

The Board is empowered to amend or modify the CSR policy, this CSR Policy is subject to such changes and amendments as may be notified by the Ministry of Corporate Affairs under Section 135 of the Companies Act, 2013 and rules made thereunder and the same shall be read in line with the provisions of the Act applicable to the Company from time to time.

FOR SOGEFI ADM SUSPENSIONS PRIVATE LIMITED



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