

# Corporate Social Responsibility Policy (India ONLY)

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## CORPORATE SOCIAL RESPONSIBILITY POLICY

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#### **Preamble**

Section 135 of the Act requires every company having net worth of INR 500,00,00,000 (Indian Rupees Five Hundred Crore) or more, or turnover of rupees INR 1000,00,00,000 (Indian Rupees One Thousand Crores) or more or a net profit of rupees INR 5,00,00,000 (Indian Rupees Five Crores) or more during the immediately preceding financial year to constitute a corporate social responsibility ("CSR") committee of the board of directors ("Board") of the Company.

Striim India Engineering Private Limited ("Company") is a private limited company incorporated under the Companies Act, 2013 ("Act") and having its registered office at 5th Floor, Fortius, Plot No.1, Sidco Industrial Estate, Guindy, Chennai, 600032. The Company has formulated and adopted the corporate social responsibility policy ("CSR Policy") in terms of Section 135 of the Act and Companies (Corporate Social Responsibility) Policy Rules, 2014 ("CSR Rules").

This CSR Policy was recommended by the CSR committee and approved by the Board of the Company.

## Objective and Applicability

- 1. The CSR Policy sets out our commitment to ensuring that our activities extend beyond business and include initiatives and endeavours for the benefit and development of the community and society. The CSR Policy lays down the guidelines for undertaking programmes geared towards social welfare activities or initiatives. Through this CSR Policy, the Company proposes to adopt short-, medium- and long-term CSR programs and initiatives, as it may deed fit.
- 2. Notwithstanding anything to the contrary contained in this CSR Policy but subject to applicable law, in the event that the Company fails to meet the thresholds set out under Section 135(1) of the Act for three consecutive financial years, it shall not be required to: (i) constitute/maintain the CSR committee; and (ii) comply with the provisions of this CSR Policy till such time as it again meets the criteria specified in Section 135(1) of the Act.

3. Where the amount required to be spent by the Company on CSR does not exceed INR 50,00,000 (Indian Rupees Fifty Lakhs), the board of directors of the Company shall discharge the obligations of the CSR committee under this CSR Policy.

#### **Focus Areas**

- 1. In accordance with the requirements under the Act, the Company shall undertake CSR activities as approved by the Board which shall fall within the scope of the following activities:
  - a) 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.
  - b) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
  - c) 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.
  - d) 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.
  - e) 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.
  - f) 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.

- g) Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports.
- h) 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.
- 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.
- (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).
- k) rural development projects.
- l) slum area development. For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.
- m) disaster management, including relief, rehabilitation and reconstruction activities.

2. The Company may undertake the CSR activities in different focus areas, as approved by the Board.

## **Undertaking CSR activities**

- 1. The CSR activities are undertaken by the Company itself or through:
  - A company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company.
  - b) A company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government.
  - c) Any entity established under an Act of Parliament or a State legislature.
  - d) A company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.
    - Explanation- For the purpose of clause (c), the term "entity" shall mean a statutory body constituted under an act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act.
- 2. The Company may engage international organisations for designing, monitoring and evaluation of the CSR projects or programmes as per this CSR Policy as well as for capacity building of their own personnel for CSR.
- 3. The Company may also collaborate with other companies for undertaking projects or programmes 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 programmes in accordance with the CSR Rules.

- 4. If the Company is undertaking the implementation of CSR on its own, then the Board shall constitute an implementation group for the purposes of implementation of the CSR activities approved by the Board from time to time (the "Implementation Group") and submitting report of the progress on the CSR activities to the Board as well as the CSR committee.
- 5. If the Company is not undertaking implementation on its own then, it can undertake the CSR activities through implementing agencies and the CSR committee shall be authorised to finalise, approve and execute agreements with any party including the implementing agency.
- 6. The CSR committee shall authorise relevant persons for the purposes of implementing CSR activities of the Company through the implementing agencies.

#### Location of CSR activities

The CSR committee will decide on the location of CSR activities to be undertaken by the Company.

#### **CSR Committee**

The CSR committee as constituted for the purpose by the Board of the Company will comprise of any 2 (two) or more directors of the Company.

# Responsibility of the CSR Committee:

- 1. Formulating and recommending to the Board, the CSR Policy and indicating CSR activities to be undertaken:
- 2. Manner of execution of the CSR activity(ies);

- 3. the modalities of utilization of funds and implementation schedules for the projects or programmes undertaken as part of the CSR activity;
- 4. Monitoring CSR activities from time to time and the reporting mechanism for the same;
- 5. Details of need and impact assessment, if any, for the projects undertaken by the Company.

#### **CSR Contribution**

- 1. The Company shall ensure that it spends, every financial year, such amounts towards its CSR contribution as may be applicable to it as per the Act read with CSR Rules.
- 2. Any unspent CSR shall be transferred by the Company to any fund in accordance with the CSR Rules.

#### Governance

- 1. The CSR committee will be responsible for implementing the CSR activities of the Company. The CSR committee will also assist the Board in reporting the progress of deployed initiatives and in making appropriate disclosures on a periodic basis.
- 2. The CSR committee shall maintain proper minutes of all its meetings whenever convened.
- 3. All questions of interpretation or discrepancies which shall arise under, or as a result of, or pursuant to, or in connection with the implementation of the CSR Policy or any initiative or activities undertaken by the Company in terms of the CSR Policy, shall be referred to the CSR committee for their inputs and the final decision/determination/interpretation shall rest with the Board.

## Responsibility of the Board

- 1. Approve the CSR Policy and the CSR expenditure after taking into consideration the recommendations made by the CSR committee.
- 2. Ensure the CSR spending every financial year is in pursuance with the CSR Policy, the Act and the CSR Rules.
- 3. Ensure that CSR activities included in the CSR Policy are undertaken by the Company and that such activities are related to the activities specified in Schedule VII of the Act.
- 4. Directors' report to include the annual report on CSR containing the particulars as specified and in accordance with the Act and CSR Rules.
- 5. Ensure that the CSR spending has been utilized for the purposes and in the manner as approved and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- 6. In case of an ongoing project (as defined in the CSR Rules), it shall monitor the implementation of the project with reference to the approved timelines and year wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

## **Funding, Selection and Monitoring Process**

- 1. The CSR committee will evaluate proposals received and projects will be prioritised by assessing their impact. The CSR committee will deliberate on the proposals and approve proposals for implementation to the Board. At the time of recommendation to the Board, the following factors may be provided to the Board by the CSR committee if deemed necessary:
  - a) Focus area and the outcome of the CSR activity;
  - b) amount to be allocated to the CSR activity;
  - c) timelines for completion of the CSR activity;

- d) whether the activity will be undertaken by the Company or through an implementing agency or any other way subject to the Act and the CSR Rules; and
- e) any other detail as it may deem necessary.
- 2. If the CSR activity is undertaken by the Company on its own then, the utilisation of the amount sanctioned towards CSR activities should be reported by the Implementation Group to the CSR committee on an annual basis in such manner as the CSR committee may direct.
- 3. If the CSR activities are undertaken through an implementing agency, the person authorized by the CSR committee should obtain relevant information from the implementing agency and ensure that the progress on such CSR activity is submitted to the Board as well the CSR committee on an annual basis in such manner as the CSR committee may direct.
- 4. Upon receipt of such progress report of the CSR activity undertaken, the CSR committee may review and deliberate upon such reports and provide such inputs or recommendations, as it may deem necessary, to the Board. It is clarified that the Board shall not be obliged to comply with such recommendations of the CSR committee.

## Website Display

In terms of the CSR Rules, the Board of the Company shall mandatorily disclose the composition of the CSR committee, and CSR Policy and projects approved by the Board on their website, if any, for public access.

#### **Amendments**

The CSR Policy may be reviewed and amended from time to time by the Board of the Company.

#### FOR AND ON BEHALF OF STRIIM ENGINEERING SERVICES INDIA PRIVATE LIMITED

Docusigned by:
Maladevan Laksliminarayanan
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Director: Mahadevan Lakshminarayanan

DIN: 06371941

Date: January 25, 2024