

Corporate Social Responsibility (CSR) Policy

The Corporate Social Responsibility Policy ('CSR Policy') of SG ANALYTICS PRIVATE LIMITED in accordance with section 135 of the Companies Act 2013 and the rules made there under. The CSR Policy shall apply to all the CSR activities undertaken by the Company and the Corporate Social Responsibility (CSR) Committee was constituted by the Board of Directors of the Company at their meeting held on ----- 06/10/2014 2014.

CSR Vision:

To work in partnership with communities and relevant stakeholders to facilitate individuals and groups from the disadvantaged sections to access a better quality of life.

The Company's CSR activities build an important bridge between business operations and social commitment evolving into an integral part of business functions, goals and strategy.

CSR Objectives:

The Company firmly believes that CSR is primarily, the responsibility of the Company in relation to the impact of its decisions and activities on the society and also the environment, through a transparent and ethical behavior which is:

- (a) consistent with sustainable development and welfare of society,
- (b) takes into account the expectations of stakeholders,
- (c) is in compliance with applicable law, and
- (d) is uniformly integrated and practiced throughout the Company.

Validity of CSR Policy:

The CSR policy as approved by CSR Committee & Board of Directors of the Company shall be implemented with immediate effect and shall be amended from time to time as may be required under the provisions of Section 135, Companies Act, 2013 and rules made thereunder.

Recognized Activities for the Purpose of CSR:

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 normal course of business of a company.

The activities as specified in Schedule VII that can be undertaken by a company to fulfill its CSR obligations are mentioned below:

1. eradicating hunger, poverty and malnutrition, promoting preventive health care and 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;
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 arts and handicrafts;
6. measures for the benefit of armed forces veterans, war widows and their dependents;
7. training to promote rural sports, nationally recognised sports, Paralympics sports and Olympic sports;
8. 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;
9. contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

10. rural development projects.

The Above list is illustrative not exhaustive. All activities under the CSR activities should be environment friendly and socially acceptable to the local people and society. Further Ministry of Corporate Affairs vide Notification dated 24.10.2014 increased the scope of contribution made towards Corporate Social Responsibility Activities namely:

- (i) In item (1), after the words "and sanitation", the words "including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation" shall be inserted;
- (ii) (ii) In item (4), after the words "and water", the words "including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga" shall be inserted.

Scope of CSR:

A. Education.

- i) Support to Technical /Vocational Institutions for their self -development.
- ii) Academic education by way of financial assistance to Primary, Middle and Higher Secondary Schools.
- iii) Adult literacy amongst those belonging to BPL.
- iv) Awareness Programmes on girl education.
- v) Counseling of parents
- vi) Special attention on education, training and rehabilitation of mentally & physically challenged children/persons.
- vii) Spreading legal awareness amongst people and disadvantaged sections of the society about their rights & remedies available.
- viii) Promotion of Professional Education by setting up educational Institutions offering courses in Engg, Nursing, Management,
- ix) Medicine and in Technical subjects etc.

- x) Provide fees for a period of one year or more to the poor and meritorious, preferably girl students of the school in the operational area of the Company to enable them to get uninterrupted education

B. Water Supply including Drinking Water:

- i) Installation/Repair of Hand Pumps/Tube Wells.
- ii) Digging/Renovation of Wells.
- iii) Gainful utilization of waste water from Under -ground Mines for Cultivation or any other purpose.
- iv) Development/construction of Water Tank/Ponds.
- v) Rain water-harvesting scheme.
- vi) Formation of a Task Force of Volunteers to educate people regarding
- vii) Proper use of drinking water.
- viii) Empowerment to the villagers for maintenance of the above facilities for availability of water.

C. Health Care organizing, health awareness Camps on:

- i) Building of Toilet Blocks in School
- ii) AIDS, TB and Leprosy
- iii) Social evils like alcohol, smoking, drug abuse etc.
- iv) Child and Mother care
- v) Diet and Nutrition.

D. Environment:

- i) Organizing sensitizing programmes on Environment Management and
- ii) Pollution Control.
- iii) Green belt Development
- iv) A forestation, Social Forestry, Check Dams, Park.
- v) Restoration of mined out lands.
- vi) Development of jobs related to agro product i.e., Dairy/Poultry/farming and others.

vii) Plantation of saplings producing fruit.

E. Social Empowerment.

- i) Self /Gainful Employment Opportunities – Training of Rural Youth for Self Employment (TRYSEM) on Welding, Fabrication, and other Electronic appliances.
- ii) To provide assistance to villagers having small patch of land to develop mushroom farming, medicinal plants, farming & other cash crops to make them economically dependent on their available land resources.
- iii) Training may be provided by agricultural experts for above farming.
- iv) Organizing training programmes for women on tailoring Embroidery designs,
- v) Home Foods/Fast Foods, Pickles, Painting and Interior Decoration and other
- vi) Vocational Courses. vii) Care for senior citizens.
- viii) Adoption/construction of Hostels (especially those for SC/ST & girls)
- ix) Village Electricity/Solar Light
- x) To develop infrastructural facilities for providing electricity through Solar Lights or alternative renewal energy to the nearby villages. Recurring expenditure should be borne by the beneficiaries.
- xi) Pawan Chakki as alternative for providing electricity in villages, etc

CSR Committee:

1. The Company has constituted a Corporate Social Responsibility Committee (hereinafter referred as "the CSR Committee") as per the provision of Section 135 of the said Act; to do the work as mentioned hereinafter.

The said Committee will consist of following members:

Sr. No.	Name of the Person	Position in CSR Committee
1.	Mr. Sushant Gupta	Chairman of the committee
2.	Mrs. Parminder Kaur	Member

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

Approval of the CSR Policy of the Company as recommended by CSR Committee and disclose 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 and rules thereunder. Ensure that the activities included in CSR Policy are undertaken by the Company. Ensuring that the Company spends, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years in pursuance of the Policy.

The Board of Directors shall establish a monitoring mechanism to ensure that activities as recommended by CSR Committee and undertaken by the Company are implemented.

2. Frequency of Meetings:

The meetings of the Committee could be held at such periodic intervals as may be required.

3. Quorum:

Minimum two (2) members shall constitute a quorum for the Committee meeting.

4. Chairman:

In the absence of the Chairman, the members of the Committee present at the meeting shall choose one amongst them to act as Chairman.

5. Secretary:

Any person designated by the Company shall act as the Secretary to the CSR Committee. *(If Any)*

6. Minutes Of The Committee Meeting:

Proceedings of all meetings must be minute and signed by the Chairman of the Committee and tabled at the subsequent Board and Committee meeting.

Structure for Conducting CSR:

1. The Company may directly undertake the CSR activities.
2. The Company also may conduct CSR through
 1. Registered trust, or
 2. Registered society, or
 3. Company under section 8 of the Act i.e. non-profit organization.

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

Obligation under CSR Activities:

1. The Company is mandatorily required to spend at least 2% of the average *Net profit of Three immediately preceding financial years on specified CSR activities.

* Net Profit means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following;

- a) Any profit arising from any overseas branch or branches of the Company, whether operated as a separate Company or otherwise; and

- b) Any dividend received from other Companies in India which are covered under and complying the provisions of CSR rules.
- 2. Any surplus arising out of the CSR projects or programs or activities shall not form a part of the business profit of the Company.
- 3. The Board of Directors of the company shall, after taking into account the recommendations of CSR Committee, approve the CSR Policy for the company and disclose contents of such policy in its report and the same shall be displayed on the company's website.

Implementation:

- a) The Company's CSR projects will be implemented in a time-bound manner with clear objectives, plan, targets and robust monitoring and evaluation mechanisms.
- b) The ongoing CSR projects will be aligned to the Policy. This Policy builds on the learning and good practices of the CSR projects initiated by the Company as well as the expertise of the development sector.
- c) Project activities identified under CSR are to be implemented by Specialized Agencies and generally NOT by staff of the organization. Specialized Agencies could be made to work singly or in tandem with other agencies.
- d) Such specialized agencies would include:
 - i) Community based organization whether formal or informal.
 - ii) Elected local bodies such as Panchayats
 - iii) Voluntary Agencies (NGOs)
 - iv) Institutes/Academic Organizations
 - v) Trusts, Mission etc.
 - vi) Self-help groups
 - vii) Government, Semi Government and autonomous Organizations.

- viii) Standing Conference of Public Enterprises (SCOPE)
- ix) Mahila Mondals/Samitis and the like Contracted agencies for civil works Professional Consultancy Organization etc.

Disclosure of the Policy:

The CSR policy recommended by the CSR Committee and approved by the Board shall be displayed on the Company's website and shall be disclosed in the Board's report as well.

CSR Reporting:

The Board Report of a Company shall include an Annual Report on CSR containing particulars specified in Annexure to the CSR Rules as per the prescribed format.

Amendments in the Policy:

The Board of Directors on its own and/or on the recommendation of CSR committee can amend its policy as and when required deemed fit. Any or all provisions of CSR Policy would be subjected to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.

FOR SG ANALYTICS PRIVATE LIMITED


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