

CORPORATE SOCIAL RESPONSIBILITY POLICY

1 SCOPE AND APPLICABILITY:

This policy is applicable to SAMEEKSHA CAPITAL PRIVATE LIMITED ("the Company").

2 CSR PHILOSOPHY

"Corporate Social Responsibility" (CSR) is a continuing commitment by Business community to contribute to the Socio-economic development of a Country. The concept of CSR has gained prominence from all avenues. As a responsible Corporate Citizen, we believe that to succeed, an organization must maintain highest standards of corporate behaviour towards its employees, customers and society in which it operates and accordingly the Company has formulated this CSR Policy.

For the Company in the present context, CSR means not only investment of funds for social activities but also integration of business processes with Social processes.

3 OBJECTIVE OF CSR POLICY

- a. To lay down guidelines for proper functioning of CSR & Sustainability activities to attain sustainable development of the nearby society.
- b. To directly or indirectly take up programmes that benefit the communities in and around its work centres and results, over a period of time, in enhancing the quality of life and economic well-being of the local populace.
- c. To extend the humanitarian services in the community to further enhance the quality of life like education facilities, health facilities, basic infrastructure facilities to area that have so far been not attended to or if attended not properly and regularly attended to.
- d. To generate through its CSR initiatives, a community goodwill for the Company and help to reinforce positively and socially responsible image of the Company as a Corporate Entity.

4 BOARD-LEVEL BOARD OF DIRECTORS AND TERMS OF REFERENCE

Composition of CSR committee is not applicable to the company as the company has to spend less than INR 50 lacs for the financial year.

5 AREAS/ACTIVITIES TO BE UNDERTAKEN UNDER CSR

The Company continues its endeavour to improve the lives of people and provide opportunities for their holistic development through its different initiatives in the areas of listed in Schedule VII of the Companies Act, 2013 and any amendments thereon.

The above list is illustrative and not exhaustive. All CSR activities will be in line with the CSR vision.

6 TOTAL OUTLAY AND ANNUAL ACTION PLAN

Considering the requirements of the Companies Act, 2013, Rules and Schedule made thereunder, the Board of Directors of the Company in its meeting The surplus arising out of the CSR activities will not be considered as a part of the business profits of the Company and shall be ploughed back into the

same project, or shall be transferred to the Unspent CSR Account and it should be spent in pursuance of this CSR policy and annual action plan of the Company, or the Company may transfer such surplus amount to a Fund specified in Schedule VII of the Act, within a period of six months of the expiry of the financial year.

Any unspent amount, other than unspent amount relating to an ongoing project, will be transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. Further, unspent CSR funds of ongoing projects will be transferred within a period of 30 days from the end of the financial year to a special account opened by the company in any scheduled bank called the "Unspent Corporate Social Responsibility Account". Such amount shall be spent by the company towards CSR within a period of 3 financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of 30 days from the date of completion of the third financial year.

At the end of the financial year, the Annual Report on CSR activities will be included in the Board's Report shall be taken for utilisation of fund for CSR activities by the Company as specified in Schedule VII of the Companies Act, 2013 during every financial year as approved by the Board of Directors.

7 IMPLEMENTATION

CSR initiatives will be implemented either –

(i) Directly by the Company, or

(ii) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or

(iii) 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; or

(iv) any entity established under an Act of Parliament or a State legislature; or

(v) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

The above entities shall register with the Central Government (MCA) by filing the form CSR1 electronically with the Registrar of Companies, with effect from 1st April 2021 and shall get the CSR Regn. No. The Company may also collaborate with other companies to undertake CSR projects, provided the Board of Director of the respective companies are able to report separately on such projects.

8 MONITORING

Board of Directors shall institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the company. Board of Directors shall recommend the amount of expenditure to be incurred on the CSR activities and monitor the CSR policy of the company from time to time. Board of Directors shall carry out the following, for identification and implementation of activities.

1. The Board will decide the priority of activities to be undertaken under the CSR by grant of donation /financial assistance/sponsorship etc.
2. The Board may also interact with the CSR implementing agencies for determining the activities to be undertaken.
3. Based on the total activities to be undertaken, the Board will recommend to the Board the quantum of Budget for the year.
4. The Board will monitor and review the progress of activities undertaken/ completed.

The CSR Policy of the Company shall be uploaded on the Company's website for information of all stakeholders.

Place: Ahmedabad

For and on behalf of Board of Directors

Date: 04/05/2022

Sameeksha Capital Private Limited

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Manisha

Bhavin Shah

Manisha Shah

DIN: 02927860

DIN: 06637558

Director

Director