



**SAVY INFRA AND LOGISTICS LIMITED**

**CORPORATE SOCIAL RESONSIBILITY POLICY**

## **I. PREAMBLE**

Savy Infra & Logistics Limited (SIAL) has been one of the foremost exponents of inclusive growth since inception and has been continuing to support or undertake projects for overall development and welfare of the society in the field of environmental, conservation of natural resources, promoting proactive healthcare, education, rural development projects etc.

## **II. DEFINITIONS**

In this policy, the following definitions of the terms used shall be applicable unless the context required otherwise.

- i. "Act" means the Companies Act, 2013 and its subsequent amendments, if any.
- ii. "Administrative Overheads" means the expenses incurred by the Company for 'general management and administration' of Corporate Social Responsibility functions and it shall not include the expenses that are directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme;
- iii. "Annexure" means the Annexure appended to Companies (Corporate Social Responsibility Policy) Rules, 2014;
- iv. "Corporate Social Responsibility (CSR)" means the activities undertaken by the Company, in pursuance of its statutory obligation laid down in Section 135 of the Act in accordance with the provisions contained in these rules.
- v. "CSR Annual Action Plan" means the list of "CSR Programmes" proposed to be undertaken by the Company in a financial year as per its CSR Policy in the areas or subject specified in the Schedule VII of the Act and includes but is not limited to the following: —
  - The amount of expenditure to be incurred on the CSR Programmes;
  - The implementation schedules and manner of execution of the proposed CSR programmes;
  - The modalities of utilization of the funds of the proposed CSR Programmes;
  - The monitoring and reporting mechanism of the proposed CSR Programmes;
  - Details of any need assessment or any impact assessment studies proposed during the financial year.
- vi. "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in Section 135 of the Act;
- vii. "CSR Policy" means this policy document containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the 'CSR Annual Action Plan'
- viii. "CSR Programme" means any CSR projects or programmes or activities, undertaken by the Company as per its CSR Policy, that are in line with the activities in the areas or subjects as specified in the Schedule VII of the Act, as amended.
- ix. "CSR Programme Cost" means the expenditure incurred directly towards the designing, implementation, monitoring and evaluation of a particular CSR project or programme.

- x. “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, namely:- (i) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act;
- xi. “Ongoing Project” means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification;
- xii. “Public Authority” means ‘Public Authority’ as defined in Clause (h) of Section 2 of the Right to Information Act, 2005 (22 of 2005);
- xiii. “Rules” means the Companies (Corporate Social Responsibility Policy) Rules, 2014 and its subsequent amendments lastly vide the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021.

### III. **OBJECTIVES**

The Company is growing well in Infra & Logistics sector and also have clear focus on social upliftment and environment protection for inclusive growth on a truly empowered society. This CSR Policy lays down the guidelines and mechanism to carry out CSR Projects by the Company and report its CSR Work in the format provided by CSR rules under the Companies Act, 2013 (the Act).

### IV. **CSR COMMITTEE**

As per the provisions of section 135 (9) of the Companies Act, 2013, where the amount to be spent by a company does not exceed fifty lakh rupees, the requirement under sub-section (1) for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee provided under this section shall, in such cases, be discharged by the Board of Directors of the company.

The duties and the responsibilities of the CSR Committee in terms of the Companies Act, 2013, rules thereunder and CSR Policy, be and are hereby entrusted with the Board of Directors.

### V. **CSR POLICY**

This policy has been framed in accordance with the provision of Section 135 of Companies Act, 2013 and in accordance with CSR Rules notified thereof by the ministry of Corporate Affairs, Government of India and shall apply to all CSR Projects to be undertaken by the company in areas or subject, specified in schedule VII of the Act, within the geographical limits of India only, for the benefit of marginalized, disadvantaged, poor or deprived section of the community.

### VI. **CSR ACTIVITIES & BUDGET**

- i. The Company shall undertake CSR activities as defined in Schedule VII of the Act, The Board would approve the amount, Company shall spent on CSR activities during every financial year as required under law.
- ii. Preference shall be given to the rural areas, local area and areas around where the Company operates, for spending the amount earmarked for CSR activities.
- iii. CSR activities shall be undertaken by the Company in adherence with this CSR Policy.
- iv. CSR activities shall be undertaken only in India.

**VII. GOVERNANCE OF THE CSR POLICY**

The Board will constitute a governing mechanism to look into the CSR Policy. The Board shall be responsible for all the decisions taken with regards to the company CSR Policy.

**VIII. PLANNING & IMPLEMENTATION**

The company shall undertake the CSR Projects defined under Schedule VII of Companies Act, 2013. It will be ensured that all the CSR activities are compliant of provision of Companies Act 2013 and Schedule VII to the Act.

- a) Implementing Agency: The Project can be undertaken by
- i. The Company
  - ii. A collaborative effort with other bodies corporate
  - iii. Any/all of the following established by the company or its holding or subsidiary or associate company
    - Registered Trust
    - A Registered Society
    - A Section 8 Company registered under Companies Act, 2013. In case any of above is not established by the company or its holding or subsidiary or associate company then the Institution must have established record of three years in undertaking similar projects.
  - iv. Contribution to Approved Government Institutions.
- b) CSR Team: The CSR Team will be responsible for actual on ground implementation of CSR Projects.

**IX. MONITORING**

Monitoring mechanism shall be prepared by the company to ensure the process & function of CSR as mandated by the Board. The Board will be responsible for the monitoring of various CSR Projects or Programme.

The Board may also assign the task of implementation of the CSR Plan within specified budgets and timeframes to such persons or bodies as it may deem fit, and ensure implementation thereof.

The CSR team will provide a report to the Board on the progress of implementation of the approved CSR Activities carried out time to time. The aforesaid report will also include confirmation from the Chief Financial Officer that the funds disbursed for the CSR Activities are being utilized for the stated purpose and in the specified manner.

At the end of every financial year, the Board will consider an Annual Report on CSR activities. The said Report will be disclosed as part of the Report of the Board of Directors of the Company (hereinafter referred to as the 'Board's Report').

**X. IMPACT ASSESSMENT & EVALUATION**

The Company may take up appropriate evaluation and impact assessment of the projects. The Board shall evaluate as under:

- Expected outcomes, outputs and inputs will be clearly defined for each programme as per stated timelines.
- There shall be clarity about the scope of the programme and the need before evaluations are undertaken.
- Third parties may be engaged to ensure objective assessment across baseline and end line parameters.

#### **XI. CSR EXPENDITURE**

- It will be the Company's endeavour to spend in every financial year, two percent of its average net profits during the three immediately preceding financial years (or such other limit as may be prescribed under the Act), on CSR Activities in pursuance of this Policy.
- The CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Activities undertaken in accordance with this Policy and the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.
- Any surplus arising out of the CSR Activities will be used for CSR activities within six months from the end of the relevant financial year and shall not form part of the business profit of the company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of the CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- If CSR expenditure in a financial year exceeds the statutory limit, such excess may be set-off against CSR expenditure for the next three financial years with the approval of the Board.
- The CSR amount may be spent by the Company for creation or acquisition of a capital asset in accordance with the Act and the CSR Rules.
- In case of any unspent amount arising in any financial year out of the CSR Activities, other than ongoing Activities, such unspent amount shall be transferred within six months from the end of the financial year to a fund specified in Schedule VII of the Companies Act, 2013 or to such specific fund as may be prescribed from time to time for this purpose under the Act and the CSR Rules and the reasons for not spending the amount to be specified by the Board in Boards' Report.
- Where the unspent amount is in respect of any ongoing CSR Activities, the company shall within thirty days from the end of the financial year (or such other period as may be specified) transfer such unspent amount to a separate account called Unspent Corporate Social Responsibility Account to be opened in any scheduled bank by the Company for that financial year. The company shall utilize such unspent amount for the ongoing projects within a period of three financial years from its transfer, failing which such amount shall be transferred to a fund specified in Schedule VII of the Act or to such specific fund as may be prescribed from time to time for this purpose under the Act or Rules framed thereunder within 30 days from the end of the third financial year.
- The Company may collaborate or pool resources with other entities to undertake CSR Activities.

XII. **DOCUMENTATION**

The CSR Team of the company shall ensure that CSR Project are documented and accountability is fixed at requested level.

XIII. **DISCLOSURE**

This Policy will be hosted on the Company's website at [www.savyinfra.com](http://www.savyinfra.com) and web link thereto will be disclosed in the Board's Report of the Company

XIV. **AMENDMENTS**

This Policy may be amended by the board at any time and is subject to (i) amendments to the Companies Act, 2013 (the Act 2013) and (ii) further guidelines and enactments by the SEBI, including LODR Regulations. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.