SUNRAKSHAKK INDUSTRIES INDIA LIMITED

Corporate Social Responsibility Policy

PREAMBLE

The Corporate Social Responsibility Policy ("CSR Policy") of "Sunrakshakk Industries India Limited" has been formulated in accordance with the provisions of section 135 of the Companies Act, 2013 and rules made there under and other applicable laws to the company. This policy aims to contribute towards sustainable development of the society and environment to make planet a better place for future generations. The philosophy of CSR is imbibed in our business activities and social initiatives taken in the area of health, sanitation, drinking water, education, environment and infrastructure etc.

DEFINITIONS

(i) "**Act**" means the Companies Act, 2013.
(ii) "**Board of Directors**" or "**Board**" means the collective body of the directors of the company.
(iii) "Company" means "Sunrakshakk Industries India Limited"
(iv) "**CSR Committee**" means Corporate Social Responsibility Committee constituted by the Board of Directors of the company in accordance with the provisions of section 135 of the Companies Act, 2013 and rules made there under.
(v) "CSR Policy" means CSR Policy of Sunrakshakk Industries India Limited
(vi) "**CSR Rules**" mean the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.
(vii) "**Implementing Agency**" means any entity registered with Ministry of Corporate Affairs for undertaking CSR projects, which is engaged by the company to implement various projects in pursuance of CSR Policy.

Any term used in this policy but not defined herein shall have the same meaning assigned to them under the Act and CSR Rules as applicable to the company.

FUNCTIONS OF CSR COMMITTEE

CSR Committee was constituted by the Board of Directors with following functions assigned:

a) To formulate and recommend a CSR Policy indicating the activities to be undertaken by the company in areas or subject specified in Schedule VII to the Act;
b) To recommend the amount of expenditure to be incurred on the activities referred to in clause (a);
c) To formulate and recommend an annual action plan in pursuance of CSR Policy covering the following aspects:

(i) the list of approved CSR projects or programs to be undertakenin areas or subjects specified in Schedule VII to the Act;
(ii) the manner of execution of such projects or programs asspecified in rule 4(1) of CSR Rules;
(iii) the modalities of utilization of funds and implementationschedules for the projects or programs;
(iv) monitoring and reporting mechanism for the projects orprograms; and
(v) details of need and impact assessment, if any, for the projects undertaken by the company;

d) Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect.
e) To monitor the CSR Policy as approved by the Board from time to time.

The CSR Committee should recommend the approach and direction of CSR activities to be undertaken by the company and also provide Guiding principles for

(i) Selection of CSR projects / programmes / activities
(ii) Implementation of CSR projects / programmes / activities
(iii) Monitoring of CSR projects / programmes / activities
(iv) Formulation of the annual action plan

CSR ACTIVITIES

Company shall undertake CSR activities for development of the society and the environment, particularly in the vicinity of the areas where the facilities of the company are located.

A. The company shall undertake such activities which are broadly related to any of the following:

(i) Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive health care and sanitation
(ii) Promoting education, including special education andemployment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
(iii) Promoting gender equality, empowering women, setting uphomes and hostels for women and orphans; setting up oldage homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
(iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water.
(v) 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;

(vi) measures for the benefit of armed forces veterans, war widowsand their dependents, Central Armed Police Forces (CAPF)and Central Para Military Forces (CPMF) veterans, and their dependents including widows;

(vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports

(viii) Rural development projects

(ix) Development of area declared as "slum area" by the Governmentor Competent Authority.

(x) Disaster management, including relief, rehabilitation andreconstructionactivities.

B. The company may also contribute to the following funds as part of CSR activities:

(i) Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.

(ii) Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;

(iii) 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 Government for socio economic development and relief and welfare of theschedule caste, tribes, other backward classes, minorities and women;

(iv) 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;

(v) Contributions to public funded Universities; Indian Institute ofTechnology (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, Yogaand Naturopathy, Unani, Siddha and Homoeopathy (AYUSH);Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization(DRDO); Indian Council of Agricultural Research (ICAR); IndianCouncil of Medical Research (ICMR) and Council of Scientificand Industrial Research (CSIR), engaged in conducting researchin science, technology, engineering and medicine aimed atpromoting Sustainable Development Goals (SDGs).

The above areas as enshrined in Schedule VII to the Act and included in this policy aims to provide macro areas in which CSR projects should be undertaken by the company. The CSR Committee should consider details of CSR projects as elaborated in the annual action plan for each financial year.

Any CSR activity proposed to be undertaken as a CSR initiative, but not specifically covered in the aforesaid, may be undertaken only with the prior approval of the Board and CSR Committee.

FOCUS AREAS

While the company may undertake CSR activities in any areas listed above, the focus areas of CSR activities should be on the following aspects:

(i) Health Care
(ii) Environment protection
(iii) Rain Water Harvesting
(iv) Rural Transformation
(v) Safe Drinking Water
(vi) Education to girls & underprivileged
(vii) Disaster Management

ANNUAL ACTION PLAN

The CSR Committee shall formulate and recommend to the Board, an annual action plan which shall include the following:

(a) the list of CSR projects or programmes that are approved and to be undertaken by the company
(b) the manner of execution of such projects or programmes
(c) the modalities of utilization of funds and implementation schedules forthe projects or programmes;
(d) monitoring and reporting mechanism for the projects or programmes;and
(e) details of need and impact assessment, if any, for the projectsundertaken by the company.

The Board of Directors are empowered to alter the annual action plan during the financial year, if so recommended by the CSR Committee, based on the reasonable justification for such change.

CSR SPENDING

The company shall endeavor to achieve the objectives of CSR Policy and allocate every year:

a. Minimum 2% of its average net profits made during the three immediately preceding financial years

b. Any surplus arising out of the CSR Activities 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.

All the expenditure relating to CSR shall be approved by the CSR Committee.

The CFO shall monitor the utilization of funds for the purposes set forth and certify to this effect.

Unspent CSR amount, if any, shall be transferred to separate account in accordance with the applicable CSR Rules from time to time.

Where the Company spends an amounts in excess of requirement provided under section 135(5) of the Act, such excess amount may be set off against the requirement to spend under section 135(5) upto immediate succeeding three financial years with the approval of Board of Directors.

MODE OF IMPLEMENTATION

CSR programs, projects or activities of the company should be implementedthrough following methods:

i. Directly by the company;
ii. Implementing Agencies as under :-

(a) 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
(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; or
(c) any entity established under an Act of Parliament or a State legislature; or
(d) 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 Company shall ensure that entity mentioned above and through whom it intent to undertake any CSR activity are registered with the Central Government by filing the form CSR-1 electronically with the Ministry of Corporate Affairs.

iii. The company can also partner with local governance bodies, such as Gram Panchayats, Civic Bodies, Municipality to directly undertake approved CSR projects with the help and support of these bodies.

While undertaking any project or program through external agencies or Trusts or organizations, the Company will undertake due diligence to evaluate such organization's reputation, track record, capacity and competency, including organization structure, requisite permits and licenses, presence in desired geography and compatibility with the CSR Policy and satisfy itself that the entities in the list of eligible entities through which the company shall undertake the CSR Project or Programme are registered with the Central Government as required under the CSR Rules in this behalf.

INFORMATION DISSEMINATION

CSR Policy and activities undertaken shall be disseminated on website of the Company for public access and web link of the same shall be given in the Annual Report of the company.

REVIEW

The CSR Committee shall be fully responsible for the monitoring and review of the implementation of this policy in accordance with applicable laws from time to time. The CSR Committee shall provide recommendations as and when it deems necessary to the Board so as to amend/ modify/ revise the CSR Policy.

In case of any subsequent changes in the provisions of the Act, Rules framed thereunder or any other regulations which makes any of the provisions of this Policy inconsistent with the Act, rules or such other regulations, then the provisions of the Act, Rules or such other regulations would prevail over this Policy and the relevant provisions contained in this Policy would be modified accordingly in due course to make it consistent with applicable laws.

The Policy was approved on 12.08.2023