SHREM INVESTMENTS PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Approved By	Board of Directors
Effective Date	April 04, 2026
Version	2.0

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

A. PREAMBLE

Shrem Investments Private Limited is committed to maintaining high standards of corporate governance and regulatory compliance. This Corporate Social Responsibility ("CSR") Policy ("Policy") is formulated to provide a clear framework for undertaking CSR activities in alignment with the objectives of sustainable and inclusive development. The Company ensures that CSR initiatives are carried out in a transparent, accountable, and documented manner, aiming to create a positive impact on society while complementing the Company's business objectives.

The provisions of this Policy shall apply to the Company to the extent the Company falls within the applicability criteria prescribed under Section 135 of the Companies Act, 2013 ("Act") and the rules made thereunder, as amended from time to time.

B. OBJECTIVE AND PURPOSE:

The primary objectives of this Policy are to:

i. To set forth the company's Corporate Social Responsibility Policy for its India operations as stipulated in the Section 135 of the Companies Act, 2013 and the rules thereof.

ii. To identify and formulate the broad areas the company shall pursue towards fulfilling its CSR Obligations.

iii. To serve as a guiding document to plan, identify, implement and monitor CSR initiatives.

C. DEFINATION:

- **Board** shall mean the Board of Directors of the Shrem Investments Private Limited.
- **Director** means a director appointed to the Board of a company.
- **Board of Directors** shall mean in relation to a company, the collective body of the Directors of the company;
- **CSR Activities** means such programs and projects as may be recommended and approved by the Board in terms of the CSR Policy, from time to time in pursuance of its statutory obligation laid down in Section 135 of the Companies Act, 2013 in accordance with the provisions contained in the rules as amended from time to time.

D. THRUST AREAS OF CSR

The company has adopted a structured approach to manage its CSR obligations. The company's CSR will be aligned to Schedule VII of the Companies Act 2013 with a focus on

education, environment, health and sanitation, sports, art and culture, disaster relief and rural development.

- **Education:** The Company seeks to promote education and vocational training through its CSR projects. Several challenges remain in delivery of education and access to employment opportunities. In order to bring about development, enabling access to education for the underprivileged sections of the society and enhancing employability of under-served remains a prime area of the company's CSR focus.

- **Environment:** The Company's ethos places special emphasis on issues of environmental conservation and consciousness. Its efforts include establishing its ecological footprint, creating awareness and promoting ecological activities.

- **Health and sanitation:** While access to healthcare and sanitation remains an important indicator of development, lack of access to proper medical facilities plagues many parts of rural and urban India. Company seeks to promote healthcare through its CSR projects. The Company focuses that the benefits arising out of the support for CSR activities accrue to the most need needy sections of the society.

- **Rural Development:** Majority of India's population lives in rural areas and still remains untouched from the recent development and economic progress in India. The company aims to promote and support projects focusing on improving the lives of people in the rural areas.

- **Disaster Relief:** Disaster relief is the monies or services made available to individuals and communities that have experienced losses due to disasters such as floods, hurricanes, earthquakes, drought, tornadoes, and riots. A disaster may also be defined in sociological terms as a major disruption of the social pattern of individuals and groups.

- **Support to Old Age:** Changing family value system, economic compulsions of the children, neglect and abuse has caused elders to fall through the net of family care. Homes for the Aged are for elderly people who are alone, face health problems, depression and loneliness.

- **Animal Hunger and Feeding:** India has widespread malnutrition of Animals and feeding them is necessary for basic nutrition.

- **Others:** Any other project as may be permitted under Schedule VII of Companies Act, 2013 as may be notified and amendment made thereof by Central Government from time to time and as recommended and approved by Board.

Only those projects that are over and above the normal course of business, that do not benefit only the Company's employees and their families, are treated as CSR projects within the realm of Section 135 of the Companies Act 2013.

E. POWERS OF BOARD

i. Approve the CSR policy for the company and disclose contents of such policy in its report;
ii. Ensure that the activities as are included in CSR policy of the company are undertaken by the Company;
iii. Ensure that the company spend in every financial year such amount/s as is required to be spent under the extant provisions of Companies Act 2013 read with Rules and Regulations for the same;
iv. If the company fails to spend such amount, the Board shall in its report specify the reason for not spending the requisite amount;
v. Ensure that the CSR activities are undertaken in accordance with the applicable provisions of the Companies Act, 2013, Schedule VII and the CSR Rules, as amended from time to time

F. CSR BUDGET

The budget for CSR projects shall be recommended and approved by the Board as per the requirements laid out in Section 135 of the Companies Act, 2013 and the rules made thereunder.

The total CSR expenditure proposed under this Policy shall be at least 2% of the average net profits of the Company made during the three immediately preceding financial years, calculated in accordance with Section 198 of the Companies Act, 2013, subject to the applicable provisions of Section 135 and the rules made thereunder.

G. CSR Projects

a) Project identification

CSR projects will be proposed and prioritized based on their social impact and alignment with the thrust areas. Additionally, for those projects classified as CSR, the projects must conform to the requirements of the Section 135 of the Companies Act 2013. The projects that are located in proximity to the areas where the company operates and where there is a greater scope for employee volunteering would be accorded preference for approval.

b) Budget of the project

The Board will evaluate and approve the budgetary requirements of the CSR projects.

c) Implementation

The company may implement the CSR projects in one or more of the following modes or by way of a combination thereof:

i. Directly by the company as projects.
ii. Through a registered trust or registered society or Company established under section 8 of the Companies Act 2013.
iii. Collaborate with other Companies for undertaking projects jointly.
iv. Through one or more implementing agencies appointed from time to time by Board.

d) Reporting

The Company will disclose CSR activities in its annual report and maintain records of funds spent, projects undertaken, and outcomes achieved.

H. TREATMENT OF SURPLUSES

Any surplus generated from CSR projects undertaken by the company will be tracked and channelized into the CSR budget. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.

I. TRANSFER OF UNSPENT CSR AMOUNT

Where the Company fails to spend the amount earmarked for CSR activities during a financial year, the treatment of the unspent amount shall be in accordance with Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

a) Unspent amount relating to an ongoing project:

Where any amount remains unspent pursuant to any ongoing project, the Company shall transfer such unspent amount to a separate bank account to be opened by the Company in that behalf for that financial year, to be called the "Unspent CSR Account", within 30 days from the end of the financial year.

The amount so transferred shall be spent by the Company in pursuance of its CSR Policy within a period of three financial years from the date of such transfer.

If the Company fails to spend the amount within the said period, the Company shall transfer the same to a Fund specified in Schedule VII of the Companies Act, 2013, within 30 days from the end of the third financial year, as required under Section 135(6).

b) Unspent amount not relating to an ongoing project:

Any unspent amount relating to CSR activities other than an ongoing project shall be dealt with in accordance with the applicable provisions of Section 135(5) of the Companies Act, 2013 and the CSR Rules, including transfer to a Fund specified in Schedule VII within the prescribed timeline.

J. REVIEW AND AMENDMENT OF POLICY

This Policy shall be reviewed annually or as required. The Board reserves the right to amend or modify this Policy as and when required.

Adopted by the board of directors of Shrem Investments Private Limited on April 04, 2026.

For Shrem Investments Private Limited

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Nitan Chhatwal
Director
DIN: 00115575