



**SHREM INFRA STRUCTURE PRIVATE LIMITED**  
**CIN: U45100MH2014PTC254839**

<b>Topic</b>	<b>Corporate Social Responsibility Policy</b>
<b>Created by</b>	<b>SISPL Team with help from Professionals</b>
<b>Approved by</b>	<b>CSR Committee of the Board And Board of Directors of SISPL</b>
<b>Approval date</b>	<b>6<sup>th</sup> April, 2018</b>



## **CSR Policy for Shrem Infra Structure Private Limited**

### **Table of Contents**

About SISPL.....	3
1. Policy Statement .....	4
2. Objectives of the Policy .....	5
3. Thrust areas of CSR .....	5
4. Governance Structure.....	6
a. CSR Committee of the Board.....	6
Responsibilities of the CSRC .....	6
5. CSR Budget.....	6
6. CSR Projects .....	7
A.CSR Project Lifecycle.....	7
B.Partner Qualifications.....	8
C.Treatment of Surpluses .....	8
7. Notification .....	8
8. Amendments to the Policy .....	8



### **About SISPL**

Shrem Infra Structure Private Limited (hereinafter referred to as “Shrem Infra” or “the company” or “SISPL”) is engaged in business of infrastructure development.

### **Business Model**

Shrem Group established in 2011 and based out of Mumbai, Shrem Group of Companies creates value in sectors that offer stability and growth prospects.

The Company has setup an Infrastructure Investment Trust in the name of Shrem InvIT and to act as Sponsor of shrem InvIT, Company has entered into trust deed with Axis Trustee Services Limited on 31/12/2020 under the provisions of Indian Trust Act, 1882 and Registered with SEBI (Infrastructure Investment Trusts) Regulation, 2014, for the purpose of carrying on the activity of an infrastructure investment trust and for making investment in infrastructure projects or securities of Indian Companies engage in infrastructure sector.



## 1. Policy Statement

The vision of SISPL encapsulate its Corporate Social Responsibility (CSR) ethos and places its stakeholders at the centre of its operations.

In pursuance of its vision of inculcating good corporate citizenship, SISPL will engage in strategic philanthropic programs to improve the quality of life of under-served, disadvantaged and marginalized communities.

The company will comply with Section 135 of the Companies Act, 2013 for CSR activities. As part of SISPL's obligations towards CSR, it will support impact-driven projects that address critical social, environmental and economic needs of the sections of the society.

SISPL will endeavor to build and maintain transparent and lasting relationships with its stakeholders through timely and transparent communication.

*SISPL's CSR vision is guided by the company's core values:*

- We ensure customer satisfaction by adding value and honoring commitments at all times.*
- We build transparent lasting relationships and stand for integrity and mutual trust.*
- We encourage an entrepreneurial attitude and instill in our employees the desire to excel.*
- We embrace and respect diversity while working together as One SISPL.*
- We foster a learning environment and nurture innovative thinking*
- We are committed to building shareholder value and maintaining high standards of corporate governance.*
- We strive to be an eco-friendly organization*

**SISPL seeks to its stakeholders through excellence in service and demonstrating leadership in CSR.**



## 2. Objectives of the Policy

The objectives of this policy are:

- (a) 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.
- (b) To identify and formulate the broad areas the company shall pursue towards fulfilling its CSR Obligations.
- (c) To serve as a guiding document to plan, identify, implement and monitor CSR initiatives.

## 3. 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:** SISPL 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. SISPL 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 CSR Committee.

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.

#### **4. Governance Structure**

The company has constituted a robust and transparent governance structure to oversee the implementation of the CSR Policy. The structure and responsibilities have been described below.

##### **a. CSR Committee of the Board**

SISPL has constituted a CSR (CSR) Committee of the Board to oversee the implementation of CSR in the Company as per requirements of Section 135 of the Companies Act, 2013 read with Rule 5 of Companies (Corporate Social Responsibility Policy) Rules, 2014. The Committee will be ultimately responsible for the implementation of this policy. The Committee will report to the Board of Directors.

The CSR Committee is comprised of the following members:

1. Ms. Krishani Nitan Chhatwal, Director
2. Mr. Shyam Sunder Malani, Director

##### **Responsibilities of the CSRC**

- Formulate SISPL's CSR Policy and recommend to the Board, which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Companies Act 2013, and the notifications thereof.
- Recommend the CSR expenditure to the Board of SISPL, for approval; entitled to recommend a higher amount than that specified in the Companies Act 2013 based on financial and other considerations.
- Provide strategic direction to CSR initiatives in alignment with the Policy.
- Institute a transparent monitoring mechanism for implementation of CSR projects.
- Monitor the CSR Policy of the company from time to time.
- Meet at a periodicity it deems fit to review the progress.

#### **5. CSR Budget**

- The budget for CSR projects shall be recommended by the CSR Committee of the Board and approved by the Board of SISPL as per the requirements laid out in the Section 135 of the Companies Act 2013. The total budget proposed for the CSR projects covered under this policy shall be 2% of the average net profits of SISPL made during the three immediately preceding financial years; where the 'net profit' is calculated as mentioned in Section 135 of the Companies Act 2013 for CSR Spend. The Committee is entitled to recommend a higher amount than that specified in the Companies Act 2013 based on financial and other considerations.



## **6. CSR Projects**

### **A. CSR Project Lifecycle**

CSR projects are strategically planned and managed at SISPL. Following are the different stages of the project:

#### **a. Project identification**

The projects will be prioritized and suggested based on suitable qualifiers by the CSR Committee and presented to the CSR Committee for approval. The projects must be aligned to at least one of the thrust areas of CSR. 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 CSR Committee is responsible for evaluating the budgetary requirements of the project, and recommend to the Board of Directors.

#### **c. Implementation**

The CSR Committee in consultation with the Working Team shall formulate a plan of action for the approved projects that specify details of the project including activities to be undertaken, period of implementation, budget plan, project governance and expected results.

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 CSR Committee.

#### **d. Monitoring**

The CSR Committee along with the working team of a specific project and program managers/ owners will be responsible for monitoring of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports.

To ensure the transparency and efficiency of the implementation process, mechanisms to track data and monitor projects will be established. These projects will be evaluated against the milestones defined as per the plan of action and reviewed by the CSR Committee on a time to time basis.

**e. Reporting**

The CSR committee will annually publish report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act, 2013. The CSR Committee shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR policy is in compliance with the approved policy of the Company.

**B. Partner Qualifications**

Where CSR programs are awarded to implementation agencies, the company will ensure that they are a Registered Trust, Society or a Section 8 Company. The company will conduct due diligence on potential partner agencies to ensure that they have clearly explained mission and vision, do not have a conflict of interest in working with SISPL, have appropriate documentation such as audit reports, annual reports and registration forms as per 80G/12A. The company will also consider reputation risks in selecting a partner agency.

**C. 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.


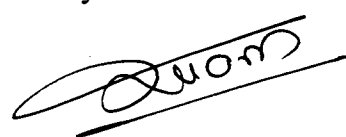
**8. Notification**

The CSR Policy may be displayed on the website of the Company, on approval of the Board. The CSR Committee should notify the employees about the policy from time to time. The policy may be displayed permanently on the company's intranet enabling every employee to access, be aware and contribute to the policy and drive actions going forward. The new employees may be informed about the policy by the HR department at the time of on boarding.

**9. Amendments to the Policy**

This policy shall be reviewed on periodical basis as may deems fit by the CSR Committee in consultation with Board of Directors, to check the effectiveness and impact of the policy. The CSR Committee may amend or modify this policy in whole or in part, at any time, as deemed necessary. Any amendments or modifications will be suitably notified to all stakeholders.

For Shrem Infra Structure Private Limited

<p>Ms. Krishani Nitan Chhatwal</p>  <p>Director</p>	<p>Mr. Shyam Sunder Malani</p>  <p>Director</p>
--	---

\*\*\*\*\*