



**SAFARI INDUSTRIES (INDIA) LIMITED**

**CORPORATE SOCIAL RESPONSIBILITY POLICY  
("CSR Policy")**

**Safari Industries (India) Limited**  
**Corporate Social Responsibility Policy**

**1. Preamble:**

Safari Industries (India) Limited (“Company”), as a responsible corporate citizen has laid down the guidelines and mechanism for undertaking socially useful programmes for the welfare and sustainable development of the community at large.

This Corporate Social Responsibility (“CSR”) Policy shall operate as the CSR Policy of the Company in terms of Section 135 of the Companies Act, 2013 (“Act”) and the rules made thereunder, as may be amended from time to time.

**2. Vision and Objective:**

2.1 The Company, through its CSR initiatives, contributes positively to the social, economic and environmental development to enhance, transform and improve the lives of the people living in the communities in which we operate.

**2.2 The objective of the CSR Policy is to:**

2.2.1 Ensure increased commitment at all levels in the organization, to manage and operate its business in an economically, socially and environmentally sustainable manner, in the interests of all its stakeholders.

2.2.2 To generate, through its CSR initiatives, goodwill which will help and reinforce a positive and socially responsible image of the Company as a responsible corporate entity.

**3. CSR Projects/ Programmes:**

3.1. The Company proposes to adopt one or more of the following CSR projects/ programmes/ activities as prescribed by applicable laws, including Schedule VII of the Act, as amended from time to time:

3.1.1 Providing facilities to vulnerable and needy sections of the communities living near the Company’s (including its subsidiaries) manufacturing facilities, in particular for children, women and senior citizens for primary health care support and sanitation, education and area development.

3.1.2 Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by programmes the Central Government for the promotion of sanitation and making available safe drinking water;

3.1.3 Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;

- 3.1.4 Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- 3.1.5 Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- 3.1.6 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;
- 3.1.7 Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- 3.1.8 Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports;
- 3.1.9 Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) any other fund set up by the Central Government. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- 3.1.10 (a) 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; and  
  
(b) Contributions to public funded Universities; Indian Institute of Technology (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, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).;
- 3.1.11 Rural development projects;
- 3.1.12 Slum Area Development;
- 3.1.13 Disaster management, including relief, rehabilitation and reconstruction activities.

3.1.14 Such other activity as the Board may consider appropriate which is in line with Schedule VII of the Act as amended from time to time.

3.2. The CSR activities shall be undertaken within the territory of the Republic of India.

3.3. No specific CSR projects or programmes shall be undertaken in pursuance of the following:

- (a) Activities undertaken in pursuance of normal course of business of the Company.
- (b) Any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
- (c) Contribution of any amount directly or indirectly to any political party under Section 182 of the Act;
- (d) Activities benefitting employees of the Company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
- (e) Activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services;
- (f) Activities carried out for fulfilment of any other statutory obligations under any law in force in India.

3.4. In furtherance of specific CSR projects or programmes, the Company may undertake the CSR projects or programmes itself or collaborate through any of the following entities registered with Central Government by filing Form CSR-1 with the Registrar and having unique CSR Registration Number:

- (a) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company.
- (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, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Explanation: For the purpose of clause (c), the term “entity” shall mean a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act.

- 3.5 The Company may also collaborate with other companies for undertaking CSR projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

#### **4. Annual Action Plan:**

The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of this CSR Policy, which shall include the following, namely:

- The list of CSR Projects or Programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- The manner of execution of such Projects or Programmes as specified in Sub-Rule (1) of Rule 4 of the Companies (Corporate Social Responsibility Policy) Rules, 2014;
- The modalities of utilisation of funds and implementation schedules for the Projects or Programmes;
- Monitoring and reporting mechanism for the Projects or Programmes; and
- Details of need and impact assessment, if any, for the Projects undertaken by the Company:

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

#### **5. CSR Committee:**

The Committee shall be constituted/ reconstituted by and will serve at the discretion of the Board. The Committee composition shall be in accordance with statutory provisions prescribed by the Act as amended from time to time. The Board shall have authority to reconstitute the Committee from time to time in order comply with the provisions of the Act.

The CSR Policy and programmes shall be implemented, managed and supervised by the CSR Committee appointed by the Board of Directors of the Company.

#### **5. Roles and Responsibilities of the CSR Committee:**

The CSR Committee shall:

- 5.1. Formulate and recommend to the Board of Directors, the CSR Policy and indicating activities to be undertaken by the Company in areas or subject, specified in Schedule VII of the Act.
- 5.2. Decide the CSR Projects or Programmes to be taken up by the Company either directly or through entities mentioned in Point 3.4 hereinabove.

- 5.3. Place before the Board the CSR projects or programmes proposed to be taken by the Company for approval, each year.
- 5.4. Define and monitor the Budgets for the carrying out the Projects or Programmes.
- 5.5. Recommend the amount of expenditure for the CSR activities.
- 5.6. Oversee the progress of the CSR Projects or Programmes rolled out under this Policy as may be required.
- 5.7. Submit a Report to the Board of Directors on all CSR Activities undertaken during the Financial Year.
- 5.8. Monitor and Review the implementation of the CSR Policy.
- 5.9. Formulating and recommending to the Board of Directors, an Annual Action Plan framed in pursuance of this CSR Policy.

**6. Role and Responsibilities of the Board:**

- 6.1. The Board shall take into account the recommendations of the CSR Committee and provide appropriate instructions/ directions to the CSR Committee when required.
- 6.2. The Board shall consider the CSR Policy formulated by the CSR Committee and approve the same with or without modifications, if required.
- 6.3. The Board shall ensure that activities included by the Company in the CSR Policy are in accordance with Schedule VII of the Act.
- 6.4. The Board shall consider the budgetary allocation proposed by the CSR Committee and approve the same with or without modifications, if required.
- 6.5. The Board shall ensure that the CSR activities undertaken by the Company are in accordance with the CSR Policy of the Company.
- 6.6. The Board shall monitor the CSR activities of the Company in accordance with its CSR Policy and the law.
- 6.7. Place the CSR Policy of the Company on the Company's website.
- 6.8. The Board shall consider the Annual Action Plan formulated by the CSR Committee and approve the same with or without modifications, if required.
- 6.9. In case of ongoing project, the Board shall monitor the implementation of the CSR project with reference to the approved timelines and year wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

- 6.10 The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.

**7. Financial Outlay for CSR Activities:**

- 7.1. Every year, the Company shall with the approval of its Board of Directors make a budgetary allocation for CSR activities/ projects for the year. The budgetary allocation will be based on the profitability of the Company and the requirements of applicable laws.
- 7.2. The Company expects to spend the budgeted amount allocated for CSR activities/ projects planned for each financial year, within that year. If for any reason, the budget of a year remains unutilised, unless the unspent amount relates to any ongoing project referred to in Section 135(6) of the Act, transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. The CSR Committee and the Board of Directors will disclose the reasons for not being able to spend the entire budgeted amount on the CSR activities as planned for that year in the Boards' Report of the Company.

Any amount remaining unspent, pursuant to any ongoing project, fulfilling such conditions as may be prescribed, undertaken by the Company in pursuance of this Policy, shall be transferred by the Company in the manner as may be prescribed in the Act and rules made thereunder.

- 7.3. Any surplus arising out of the CSR activities, projects or programmes shall not form part of the business profits of the Company. It shall be ploughed back into the same project or transfer it to Unspent CSR Account and spent in accordance to this CSR Policy/ Annual Action Plan/ Schedule VII of the Act within a period of six months of the expiry of the financial year.
- 7.4. Excess amount spent towards CSR can be carry forwarded/set off upto immediate succeeding three financial years subject to the conditions that:
- (i) The excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of Point 7.3 hereinabove;
  - (ii) The Board of the company shall pass a resolution to that effect.

**8. Monitoring and Reporting:**

- 8.1. The Board of Directors of the Company shall report in the Board's Report a detailed description as per the prescribed format, of the CSR activities undertaken and status update thereof.
- 8.2. The CSR Committee is responsible for undertaking the CSR activities and ensuring that the CSR Budget is utilized as per the statutory requirement.
- 8.3. The Chief Financial Officer shall certify and confirm to the Board that the funds disbursed for CSR activities are utilized in the manner as approved by the Board;
- 8.3. During every financial year, the CSR Committee will meet at as when required for the purpose of undertaking overview of the CSR activities. The Committee shall review and discuss the scope of the activities or programmes or projects those were undertaken during the financial

year as a part of the company's CSR activities/projects. The Board of Directors of the Company shall from time to time review CSR activities of the Company.

- 8.4 The Company may engage International Organization for designing, monitoring and evaluation of CSR projects/programmes as per its CSR policy as well as for capacity building of their own personnel for CSR.

**9. Amendment:**

Any change in the Policy shall be approved by the Board of Directors of the Company based on the recommendations of the CSR Committee in accordance with the Companies Act, 2013 and rules made thereunder. The Board of Directors shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.