
SUSHEE INFRA & MINING LIMITED

**CORPORATE SOCIAL
RESPONSIBILITY (CSR) POLICY**

1. CONTEXT:

While Sushee Infra & Mining Limited (“SIML”) continues to be involved in infrastructure activities, it has not lost sight of its commitment to play its role as an enlightened entity. Corporate Social Responsibility has always been on its agenda. Further pursuant to Section 135 of the Companies Act, 2013, and Companies (Corporate Social Responsibility Policy) Rules, 2014 every Company having net worth of Rs. 500 crore or more or turnover of Rs. 1,000 crore or more or net profit of Rs. 5 crore or more shall constitute Corporate Social Responsibility Committee (‘CSR Committee’) and the said Committee shall formulate and recommend Policy to the Board. The CSR Committee so constituted has formulated and recommended this Policy on Corporate Social Responsibility (CSR Policy) to the Board of Directors of SIML for its approval.

2. OBJECTIVES OF THE POLICY:

The Policy intends in:

- i. Establishing a guideline for compliance with the provisions of Regulations to dedicate a percentage of Company’s profits for social projects.
- ii. Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.

3. SCOPE OF CORPORATE SOCIAL RESPONSIBILITY POLICY:

The policy would pertain to all activities undertaken by the Company towards fulfilling its corporate social responsibility objectives. The policy would also ensure compliance with section 135 of the Companies Act, 2013 (“The Act”) and would include the activities as covered under Schedule VII to the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 and as amended from time to time.

4. CSR BUDGET AND MONITORING:

The CSR Committee will abide by the provisions relating to annual expenditure on CSR activities as laid down in Section 135 of the Companies Act, 2013 read with Companies

(Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time. The surplus arising out of the CSR projects or programs or activities shall not form part of the business profits of the Company.

The CSR Committee shall ensure a transparent monitoring mechanism for CSR activities.

- a. The CSR Committee shall review the progress of CSR activities as and when the Committee may deem fit.
- b. The Board of Directors shall review the progress of CSR activities at least annually.

5. CSR COMMITTEE:

Pursuant to Section 135 of the Companies Act 2013, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The members of the committee shall be appointed by the Board of Directors of SIML which shall consist of at least two or more Board Directors.

Meeting: The CSR committee shall hold at least one CSR Committee meeting in a financial year. The quorum of meetings of the Committee shall be two member or at least one third of the total number of members presented personally or via Tele- or video- conference, whichever is lower.

The CSR Committee shall decide the CSR initiatives for each financial year and accordingly recommend the agenda to the Board of Directors.

The CSR agenda for the financial year shall indicate the activities to be undertaken for the financial year, and the expenditure to be incurred on the CSR initiatives.

Board of Directors: The Board of Directors shall take into account the recommendations made by the CSR Committee and approve the CSR initiatives for SIML.

Role of the CSR Committee:

- a. To formulate and recommend to the Board of Directors, the CSR Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Act and the applicable Rules and as amended from time to time;
- b. To recommend CSR activities to be undertaken by the Company in collaboration

with any other company or any other entity, as the case may be;

- c. To recommend the amount of expenditure to be incurred on the CSR activities;
- d. To formulate the CSR Budget based on the CSR activities planned for the year;
- e. To create an effective due diligence and monitoring mechanism for implementation of the approved CSR activities;
- f. To submit reports to the Board of Directors in respect of the CSR activities undertaken by SIML: and
- g. To decide on the locations for CSR activities.

6. REPORTING:

Significant CSR Activities and achievements, if any will be reported as a part of the Board's Report and also as per any other statutory and regulatory reporting requirement(s).

7. EFFECTIVE DATE:

This Policy shall be effective from the date on which it is approved by the Board of Directors on recommendation of the CSR Committee.

8. AMENDMENTS TO THE POLICY:

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this policy, as and when required deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with regulations on the subject as may be issued from relevant statutory authorities from time to time.

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