

**Sattva Holding and Trading Private  
Limited**

**Corporate Social Responsibility Policy**

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**SATTVA HOLDING AND TRADING PRIVATE LIMITED**  
**CORPORATE SOCIAL RESPONSIBILITY POLICY**

Sattva Holding and Trading Private Limited (“NBFC”) believes in responsible corporate citizenship and is committed to operating in a manner that contributes to the sustainable development of society, environment, and stakeholders. This policy aims to define the framework for undertaking CSR activities in compliance with the requirements of Section 135 of the Companies Act, 2013, and the rules framed thereunder.

**1. VISION**

Sattva Holding and Trading Private Limited envisions being a socially responsible corporate citizen, committed to fostering sustainable and inclusive growth for the communities it serves. The NBFC aspires to create long-term value by integrating social, environmental, and ethical responsibilities into its business practices and by contributing meaningfully to the development of society, the protection of the environment, and the well-being of its stakeholders.

The NBFC’s vision is to support initiatives that promote equitable development, enhance the quality of life, and strengthen the socio-economic fabric of the nation, thereby aligning its business purpose with the larger goals of sustainable national progress.

**2. APPLICABILITY**

This policy shall apply to all Corporate Social Responsibility (“CSR”) initiatives and activities, mandatory or voluntary, to be undertaken by the Company as per Section 135 of the Companies Act 2013 read with rules framed thereunder, Schedule VII of the Act and other CSR provisions as may be applicable.

The applicability of CSR in a particular year and the minimum amount to be spent towards CSR shall be determined in accordance with the provisions of Section 135 of the Act and the rules made thereunder including any statutory modifications or amendments notified from time to time.

**3. OBJECTIVE**

The primary objective of this CSR Policy is to establish a structured and strategic framework for planning, implementing, monitoring, and reporting the Corporate Social Responsibility (“CSR”) activities of the NBFC in compliance with Section 135 of the Companies Act, 2013, and the rules made thereunder as may be applicable.

In particular, the CSR Policy aims to:

- a. Lay down the applicability of CSR provisions to the Company.
- b. Identify and undertake CSR projects, programs, and activities that contribute to the sustainable social and economic development of communities in and around the areas of the NBFC’s operations;
- c. Promote initiatives that advance education, healthcare, environmental sustainability, livelihood enhancement, and social welfare, with a focus on the underprivileged and marginalized sections of society;

- d. Ensure alignment of CSR initiatives with national priorities and the areas specified under Schedule VII of the Companies Act, 2013;
- e. Institutionalize a transparent governance mechanism to monitor, evaluate, and report the performance and impact of CSR activities;
- f. Foster a culture of corporate responsibility and ethical citizenship within the organization by encouraging employee participation and volunteerism in CSR initiatives; and
- g. Ensure that the NBFC's CSR initiatives are implemented effectively, generate measurable impact, and contribute to the achievement of long-term sustainable development outcomes.

#### **4. CSR PROJECTS, PROGRAMES AND ACTIVITIES**

- 4.1 The NBFC seeks to serve society by proactively identifying and responding to the needs of the communities in which it operates. CSR initiatives shall preferably be undertaken in and around the areas of the NBFC's operations, focusing on sustainable and inclusive development.
- 4.2 In pursuit of its CSR objectives, the NBFC may undertake one or more of the following CSR projects, programs, and activities, as prescribed under Schedule VII of the Companies Act, 2013, and as may be amended from time to time:
  - a. Eradicating hunger, poverty, and malnutrition; promoting health care including preventive health care and sanitation; contribution to the Swachh Bharat Kosh set up by the Central Government for the promotion of sanitation; and making available safe drinking water.
  - b. Promoting education, including special education and employment-enhancing vocational skills, especially among children, women, the elderly, and the differently-abled, and implementing livelihood enhancement projects.
  - c. Promoting gender equality, empowering women, and setting up homes and hostels for women and orphans; establishing old-age homes, day care centres, and other facilities for senior citizens; and taking measures to reduce inequalities faced by socially and economically backward groups.
  - d. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources, and maintaining the quality of soil, air, and water; including contribution to the Clean Ganga Fund set up by the Central Government for rejuvenation of the river Ganga.
  - e. Protecting national heritage, art, and culture, including restoration of buildings and sites of historical importance and works of art; setting up public libraries; and promoting and developing traditional arts and handicrafts.
  - f. Taking 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.
  - g. Providing training to promote rural sports, nationally recognized sports, Paralympic sports, and Olympic sports.
  - h. Contributing to the Prime Minister's National Relief Fund, the 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, relief, and welfare of Scheduled Castes, Scheduled Tribes, Other Backward Classes, minorities, and women.

- i. Contributing to technology incubators located within academic institutions that are approved by the Central Government.
- j. Contributing to incubators or research and development projects in the fields of science, technology, engineering, and medicine, funded by the Central Government, State Government, Public Sector Undertakings, or any agency thereof; and
- k. Contributing to public-funded universities and research institutions such as the Indian Institutes of Technology (IITs), National Laboratories, and other autonomous bodies established under departments including, but not limited to:
  - Department of Atomic Energy (DAE)
  - Department of Biotechnology (DBT)
  - Department of Science and Technology (DST)
  - Department of Pharmaceuticals
  - Ministry of AYUSH (Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy)
  - Ministry of Electronics and Information Technology (MeitY)
  - Defence Research and Development Organisation (DRDO)
  - Indian Council of Agricultural Research (ICAR)
  - Indian Council of Medical Research (ICMR)
  - Council of Scientific and Industrial Research (CSIR)

Such contributions shall be directed towards research in science, technology, engineering, and medicine aimed at promoting Sustainable Development Goals (SDGs).

- l. Undertaking rural development projects.
- m. Undertaking slum area development projects.
- n. Undertaking activities relating to disaster management, including relief, rehabilitation, and reconstruction.

## **5. GEOGRAPHICAL SCOPE AND DISCLOSURE**

- 5.1 The CSR activities of the NBFC shall be undertaken within the territory of the Republic of India, in accordance with the provisions of Section 135 of the Companies Act, 2013 and the CSR Rules framed thereunder.
- 5.2 The contents of the CSR Policy, including details of CSR projects approved by the Board, shall be disclosed in the NBFC's Annual Report and displayed on the NBFC's official website, as required under the applicable laws and regulations.

## **6. CSR COMMITTEE**

- 6.1 The CSR Committee of the NBFC, if applicable, shall comprise three or more Directors, of which at least one shall be an Independent Director.
- 6.2 Where composition of Committee is not mandated pursuant to Section 135 of the Companies Act, 2013, and the Rules made thereunder, as amended from time to time, the functions of the CSR Committee provided under this section may be discharged by the Board of Directors of such NBFC.
- 6.3 The CSR Policy and programs undertaken by the NBFC shall be implemented, managed and supervised by the CSR Committee appointed by the Board of Directors of the NBFC ("CSR Committee").

6.4 The CSR Committee shall at all times comprise of such number and category of Directors as is required by applicable laws.

6.5 The CSR Committee shall formulate, recommend and place before the Board for its approval an Annual Action Plan with briefly including and not limited to following;

- i. Minimum amount required to be spent towards CSR as per the Act.
- ii. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act.
- iii. the manner of execution of such projects or programmes, whether directly by the NBFC or through eligible implementing agencies.
- iv. the modalities of utilisation of funds and implementation schedules for the projects or programmes.
- v. monitoring and reporting mechanism for the projects or programmes.
- vi. details of need and impact assessment, if applicable, for the projects undertaken by the NBFC.
- vii. Any other matter as may be prescribed under the applicable laws or as may be deemed necessary by the Committee.

6.6 The Annual Action Plan shall be placed before the Committee every financial year for review, consideration and recommendation to the Board for approval.

## **7. ROLES AND RESPONSIBILITIES OF THE CSR COMMITTEE**

The CSR Committee shall discharge the following functions and duties:

- a. Formulate and recommend to the Board of Directors, the CSR Policy of the NBFC indicating to it the projects, programs and activities to be undertaken by the NBFC;
- b. Identify, evaluate and recommend the CSR projects, programs and activities to be undertaken by the NBFC, either directly or through registered trust, or registered society, or a NBFC established by the NBFC or its holding or subsidiary or associate NBFC under Section 8 of the Companies Act, 2013, which registered trust, registered society, or section 8 NBFC shall have an established track record of 3 years in undertaking CSR activities, projects and programs;
- c. Recommend to the Board the annual list of CSR projects, programs, or activities to be undertaken by the NBFC for each financial year, along with the proposed budgetary allocation or expenditure for each such project, program, or activity;
- d. Oversee, review and monitor on a quarterly basis the progress, implementation status and outcome of the CSR activities, projects and programs undertaken by the NBFC under the approved CSR policy;
- e. Define, approve and monitor the budgets for carrying out the approved CSR activities, projects and programs and ensure efficient utilization of CSR funds;
- f. Determine and recommend to the Board the amount of expenditure to be incurred for each CSR activity, project and program, consistent with the NBFC's CSR policy and statutory obligations;
- g. Submit to the Board, on a quarterly basis, a detailed report on the CSR activities, projects, and programs undertaken by the NBFC during the financial year, including the status of implementation, utilisation of funds, and key outcomes achieved;
- h. Implement, monitor, review, and ensure continuous compliance with the CSR Policy of the NBFC and recommend to the Board such modifications or amendments as may be necessary from time to time, to align with statutory requirements and the NBFC's CSR objectives.

## **8. ROLES AND RESPONSIBILITIES OF THE BOARD**

- 8.1 The Board shall consider the CSR Policy formulated and recommended by the CSR Committee and shall approve the same with or without modifications, if any as it may deem necessary.
- 8.2 The Board shall take into account the recommendations of the CSR Committee and may issue such instructions, directions or guidance to the CSR Committee as it may consider appropriate for the effective implementation and monitoring of the CSR activities of the NBFC.
- 8.3 The Board shall ensure that the CSR activities included in the CSR Policy and undertaken by the NBFC are in conformity with the areas and subjects specified in Schedule VII of the Companies Act, 2013, and the rules made thereunder, as amended from time to time.
- 8.4 The Board shall consider and approve the annual budgetary allocation proposed by the CSR Committee for CSR projects, programs, and activities, with or without modifications, as it may deem fit.
- 8.5 The Board shall ensure that all CSR activities, projects, and programs undertaken by the NBFC are executed and implemented in accordance with the approved CSR Policy, the Annual Action Plan, and applicable provisions of the law.
- 8.6 The Board shall monitor, either directly or through the CSR Committee, the implementation and progress of CSR activities of the NBFC to ensure that the same are conducted in accordance with the NBFC's CSR Policy, the Annual Action Plan, and the provisions of the Act and rules made thereunder.
- 8.7 The Board shall disclose in its Board's Report the composition of the CSR Committee, the contents of the CSR Policy, details of CSR activities undertaken, and such other particulars as may be prescribed under the Companies Act, 2013 and the CSR Rules framed thereunder.

## **9. IMPLEMENTATION**

- 9.1 For the purpose of effective and structured implementation, the NBFC's long-term CSR plans may be further segmented into medium-term and short-term plans. Each such plan, as may be recommended by the CSR Committee, shall:
  - a. Identify the specific CSR activities, projects, or programs proposed to be undertaken during each financial year;
  - b. Specify the annual budget allocated for each such activity or project;
  - c. Define the roles and responsibilities of the designated officials, departments, or agencies responsible for execution and monitoring; and
  - d. Prescribe the measurable outcomes, expected results, and anticipated social and/or environmental impact of each CSR activity or project.
- 9.2 The NBFC recognizes that certain CSR projects, by their very nature, may be long-term duration, extending over multiple financial years depending upon the scale, scope, and expected impact of such projects. While recommending such long-term CSR projects, the CSR Committee shall:
  - a. Estimate the total cost and funding requirements of each project; and
  - b. Recommend to the Board that the NBFC commit and earmark such funds as may be necessary to ensure continuity and completion of the project over its intended duration.
- 9.3 The NBFC may, where considered appropriate, undertake the implementation of CSR activities, projects, or programs directly through its own manpower and resources,

provided the CSR Committee is satisfied that the NBFC possesses the requisite organizational capability, technical expertise, and administrative infrastructure to effectively execute such initiatives.

- 9.4 The NBFC shall actively encourage and facilitate employee participation in its CSR initiatives. Employees may be invited to contribute their time, skills, and expertise toward CSR projects and programs of the NBFC, thereby fostering a culture of volunteerism and social responsibility across the organization.

## **10. EXPENDITURE, UTILISATION AND ACCOUNTING**

- 10.1 The Board shall approve the amount of expenditure to be incurred by the NBFC on the activities, projects and programs as specified under Schedule VII and as recommended by the CSR Committee in accordance with the NBFC's CSR Policy and Annual Action Plan.
- 10.2 The Board shall ensure that the administrative overheads relating to general management and administration of the CSR functions shall not exceed five percent (5%) of total CSR expenditure of the NBFC for the relevant financial year.
- 10.3 In the event that the NBFC spends an amount in excess of the statutory requirement prescribed under sub-section (5) of Section 135 of the Act, such excess amount may be set off against the CSR spending requirement of the immediately succeeding three financial years, subject to the following conditions:
- a. The excess amount available for set-off shall not include any surplus arising out of CSR activities, if any, in accordance with sub-rule (2) of Rule 7 of the CSR Rules; and
  - b. The Board of the NBFC shall pass a specific resolution authorizing such set-off, clearly indicating the quantum and period of adjustment.
- 10.4 Any surplus arising out of CSR activities shall not form part of the business profits of the NBFC. Such surplus shall be:
- a. Ploughed back into the same CSR project; or
  - b. Transferred to the Unspent CSR Account and utilized in pursuance of the CSR Policy and Annual Action Plan of the NBFC; or
  - c. Transferred to a Fund specified in Schedule VII of the Act, within a period of six months from the expiry of the relevant financial year, in accordance with the applicable CSR Rules.

## **11. MONITORING, EVALUATION AND REPORTING**

- 11.1 The NBFC recognizes that systematic monitoring and evaluation are critical to assess the progress, efficiency, and impact of its CSR activities, projects, and programs. Monitoring shall be conducted periodically, focusing on timelines, budgetary utilization, and achievement of defined objectives, through Key Performance Indicators (KPIs) or other measurable parameters, the periodicity of which shall be determined based on the nature and scope of each CSR project.
- 11.2 All CSR projects shall be implemented and monitored in a project-based mode with a continuous feedback mechanism to track progress and ensure timely achievement of milestones. The implementation process shall provide for mid-course corrections or modifications wherever necessary, based on ongoing assessments and practical considerations.
- 11.3 The performance of the NBFC's CSR activities shall be evaluated annually against the approved Annual Action Plan, taking into account the achievement of stated

objectives, adherence to timelines, and utilization of allocated budgets. The evaluation shall also include a qualitative and quantitative assessment of the outcomes achieved.

11.4 The CSR Committee shall oversee the overall implementation, monitoring, and evaluation of all CSR projects and programs. To ensure transparency and objectivity, the CSR Committee may, wherever deemed appropriate, engage or appoint an independent external agency to carry out monitoring, evaluation, or impact assessment of CSR activities, in accordance with the provisions of the CSR Rules.

11.5 In cases where CSR projects or programs are implemented through external implementing agencies, the NBFC may, in consultation with the CSR Committee, designate specific executives or officers of the NBFC to coordinate, supervise, and monitor the performance of such agencies to ensure adherence to agreed objectives, timelines, and compliance requirements.

## **12. AMENDMENT AND REVIEW THE POLICY**

The NBFC is committed to the periodic review and continuous improvement of its policies and procedures to ensure ongoing relevance, legal compliance, and alignment with its corporate values and objectives. Accordingly, this CSR Policy shall be subject to modification or amendment from time to time, as deemed necessary.

Any amendment, revision, or modification to any provision of this Policy shall:

- a. Be recommended by the CSR Committee;
- b. Be approved in writing by the Board of Directors of the NBFC; and
- c. Be disclosed promptly on the NBFC's official website and, where applicable, through statutory and regulatory filings, in accordance with the provisions of the Companies Act, 2013 and the rules framed thereunder.

## **13. CONTACT**

For queries related to the CSR Policy, contact:

**Mr. Percy Dajee**  
**CEO, CFO & Principal Officer**

**Or**

**Ms. Harshhika Limbachia**  
**Company Secretary & Chief**  
**Compliance Officer**



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