



CORPORATE SOCIAL RESPONSIBILITY POLICY

OSWAL GREENTECH LIMITED

(as amended upto June 2021)

**Oswal Greentech Limited
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OSWAL GREENTECH LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

Philosophy

Any business is part of a dynamically symbiotic ecosystem, which sustains it and needs sustenance in turn. At Oswal, we believe in taking our corporate social responsibilities seriously and are committed to give back to society recognizing fully well how much we owe it. We actively look for opportunities to help and support the needy and the under served in various areas of human life: education, healthcare, culture, spirituality and more. These initiatives are independent of the normal conduct of our business. Programs, projects and activities (collectively "CSR Programs") carried out in this regard are the subject matter of this Policy.

Objective:

The objective of this Policy is to operate Company's business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders and other objects of the Company alongside taking up CSR Programs, directly or indirectly, that benefit the communities and society at large, over a period of time, in enhancing the quality of life & economic well -being of the local populace.

Applicability:

The CSR policy has been formulated in consonance with provisions of Section 135 of the Companies Act, 2013. The Policy shall apply to all CSR Programs undertaken/ to be undertaken by the Company in India as detailed herein.

Definitions:

"Company/Oswal" means Oswal Greentech Limited.

"Act" means The Companies Act, 2013 and includes Companies (Corporate Social Responsibility Policy) Rules, 2014 and all other applicable rules and any statutory modifications, re -enactment thereof.

"Board" means the Board of Directors of the Company.

"CSR Committee" means the Corporate Social Responsibility committee constituted under the provisions of the Act.

"Net Profit/ Profit" refers to the average net profits of the Company, calculated in the manner as provided under the Act.

"Policy" means this Policy on Corporate Social Responsibility ("CSR").

Any other terms used but not defined in this Policy shall have the meaning given to them under the Act or any other applicable rules, guidelines and regulations prescribed there under.

CSR Programs:

CSR Programs at Oswal Greentech Limited shall direct towards achieving one or more of the following:

- To eradicate hunger, poverty and malnutrition, promoting preventive health care including preventive health care and sanitation including contribution to Swachh Bharat Kosh set up by the Central Government for the promotion of sanitization and making available safe drinking water.
- To promote education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- To promote gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- To ensure environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintain quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
- To protect 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 arts and handicrafts.
- To take up measures for the benefit of armed forces veterans, war widows and their dependents (Central Armed Police Forces and Central Para Military Forces veterans, and their dependents including widows)
- To promote health awareness & immunity building initiatives.
- To support the medical treatment of cancer patients through Mohan Dai Oswal Cancer Hospital.
- To provide residential houses to the weaker section of society.
- To train to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.

- To contribute to Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.
- To contribute or fund to technology incubators located with academic institutions which are approved by Central Government.
- To promote rural development projects.
- To develop slum areas.
- To promote such other activities towards betterment of the society as the Board may think fit.
- To contribute to/ promote such other activities as may be notified in Schedule VII to the Companies Act 2013 by Central Government from time to time.

CSR Committee:

The Board of Directors of the Company shall constitute/ reconstitute the CSR Committee from time to time in compliance with statutory requirements. The CSR Committee shall comprise of a minimum of three directors, atleast one of whom, shall be independent director. The composition and terms of reference of the Committee is available on the website of the Company at www.oswalgreens.com.

The CSR Committee shall be responsible for formulating and recommending to the Board the CSR policy and a CSR annual action plan, provided that the Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on reasonable justification to that effect. The CSR Committee reports to the Company's Board of Directors.

The CSR Annual Action Plan shall include the following:

1. List of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
2. Manner of execution of such projects or programmes;
3. Modalities of utilisation of funds and implementation schedules for the projects or programmes;
4. Monitoring and reporting mechanism for the projects or programmes;
5. Details of need and impact assessment, if any, for the projects undertaken by the company.

Roles and responsibilities:

1. Formulation, review and updating of policy including activities to be undertaken;
2. Recommendation of the CSR Annual Action Plan for CSR activities;
3. Recommend the amount of expenditure to be incurred on the activities referred to in schedule VII of the act;
4. Monitor the Corporate Social Responsibility Policy of the company from time to time;
5. Any other requirement as mandated/introduced under the Act and Rules thereto.

The CSR Committee will also ensure that:

1. The Board's Report shall include an annual report on CSR containing particulars specified in the Companies (Corporate Social Responsibility Policy) Rules, 2014 including the amendments if any;
2. The Policy is displayed on the company's website, www.oswalgreens.com in such manner as be prescribed.

Planning and Implementation:

The Company shall implement CSR Programs through Company personnel or through external implementing agencies or through other Trusts, Foundations and Section 8 companies that may be established by the Company from time to time. In such cases, the Company will specify the CSR Programs which may be undertaken by those Trusts/ Foundations in accordance with their Objects and administrative and accounting processes laid down in the respective Trust Deeds/ Charter documents. The Company shall list the CSR projects/ activities to be undertaken as per format prescribed in the Annexure A.

A. Implementing Agencies:

The CSR projects/ activities can be undertaken by the Company itself or through:

1. a company established under Section 8 of the Act, or a registered public trust or a registered society, registered under Section 12A and 80G of the Income Tax Act, 1961 (43 of 1961),
 2. established by the Company, either singly or along with any other company, or 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
 3. any entity established under an Act of Parliament or State Legislature; or
 4. a company established under section 8 of the Act, or a registered public trust or a registered society, registered under Section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.
- Every entity covered under Para (A) above, who intends to undertake any CSR activity shall register itself with the Central Government in accordance with the provisions of the Act.

Provided that this shall not affect the CSR projects or programmes approved prior to April 1, 2021.

- The Company may also collaborate with other companies for undertaking 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 Rules.

- The Chief Financial Officer or any other person responsible for financial management of the Company shall certify to the Board that the funds disbursed for CSR projects/activities have been utilised for the purposes and in the manner as approved by the Board of Directors of the Company.

B. CSR Teams

The CSR Committee may constitute a CSR team comprising of such members as the Committee may deem appropriate. The CSR Team will be responsible for the actual on-ground implementation of CSR projects across the various areas of intervention of the Company. They will also:

- a. Be responsible for the execution of the decisions taken by the CSR Committee.
- b. Implement projects based on set targets and action plans and regularly monitor them.
- c. Find suitable implementation partners and conduct due diligence.
- d. Evaluate possible collaborations with other organizations on CSR projects.
- e. Provide periodic progress reports to the CSR Committee.

Monitoring & Reporting:

The CSR Committee will be responsible for the monitoring CSR activities and report to the Board from time to time.

The CSR Committee has the powers to:

- a) Seek monitoring and implementation report from the Organizations receiving funds.
- b) Delegate a designated company official to co-ordinate with the Organization receiving funds to inspect the activities undertaken and ensure information in a timely manner.

The Board may seek a short progress report from the CSR Committee on a quarterly basis.

Impact assessment

The Company may take up appropriate evaluation and impact assessment of all or selected projects. Third parties may be engaged for this to ensure objective assessment. There shall be clarity about the objective/scope of the project and the need it is attempting to address.

Further, in respect of the projects to which the provisions of the Act and Rules thereunder relating to impact assessment are applicable, the Company, if required, shall undertake impact assessment, through an independent agency. The impact assessment reports shall be placed before the Board and shall be disclosed in such manner and at such place as may be prescribed in the Act.

Frequency of Meetings

The meetings of the Committee could be held at such periodic intervals as may be required.

Quorum

Minimum two (2) members shall constitute a quorum for the Committee meeting.

Secretary

The Company Secretary of the Company shall act as Secretary of the Committee.

Amendments:

This Policy may be amended by the Board on the recommendation of CSR Committee at any time subject to the provisions of the Act and other applicable laws.
