



CORPORATE SOCIAL RESPONSIBILITY POLICY

OSWAL GREENTECH LIMITED

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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 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 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 promote measures for the benefit of armed forces veterans, war widows and their dependents.
- 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:

CSR Committee shall be formed as per the applicable laws and the committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy.

At present, the CSR Committee comprises of following members:

1. Mrs. Aruna Oswal – Chairperson
2. Mr. Anil Bhalla – Managing Director
3. Mr. Krishan Chand Bajaj – Non- Executive Independent Director

Mrs. Aruna Oswal shall act as the Chairperson of the Committee.

Implementation:

The Company shall implement CSR Programs through:

1. Company personnel or through external implementing agencies or through Oswal Foundation (and/or 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.
2. Any other institutes, NGOs, Government, Semi-government, autonomous bodies, trusts etc. However, any such projects/ program to be undertaken through these entities shall have an established track record of 3 years of undertaking such projects/programs.

The time period/duration of each project/programs shall depend on its nature, extend of coverage and intended impact of such activity.

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.

Allocation to CSR Funds:

The allocation of fund for the purpose of carrying on the aforesaid activities would include the following:

- Not less than 2% of the average Net Profit made by the Company during immediately preceding three Financial Years.
- Any income arising from CSR funds.
- Surplus arising out of CSR activities carried out by the company and such surplus will not be part of business profit of the company.

Continuous Monitoring:

The Committee Members will receive in a prescribed format, a quarterly report of CSR spend;

1. Achievement since last progress report in terms of coverage compared to the target and reasons for variance.
2. Actual year-to-date spends compared to the budget and reasons for variance.
3. In respect of activities undertaken through outside Trust/Society/NGO's etc. there will be mechanism of monthly reporting of progress on each such activities and the amount incurred thereon.
4. The Board shall include details of CSR Programs in the format as specified in the Act in its Board's report. The Board shall specify the reasons in its report for not spending the earmarked amount in case the Company fails to spend such amount during the financial year.

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.

Chairperson

In the absence of the Chairperson, the members of the Committee present at the meeting shall choose one amongst them to act as Chairperson.

Secretary

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

Minutes of The Committee Meeting

Proceedings of all meetings must be minuted and signed by the Chairperson of the Committee and tabled at the subsequent Board and Committee meeting.

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.