



AN ISO 9001:2015; 14001:2015 ; 45001:2018 CERTIFIED COMPANY

CORPORATE SOCIAL RESPONSIBILITY POLICY

OF

SIGNATUREGLOBAL (INDIA) LIMITED

(Formerly known as Signatureglobal (India) Private Limited)

(Last amended on 1st April, 2021)

CORPORATE SOCIAL RESPONSIBILITY POLICY

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SIGNATUREGLOBAL (INDIA) LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

**[IN TERMS OF SECTION 135 OF THE COMPANIES ACT, 2013 READ WITH COMPANIES
(CORPORATE SOCIAL RESPONSIBILITY POLICY) RULES, 2014]**

1. INTRODUCTION

Signatureglobal (India) Limited (the “Company”) is a 21st century real estate and infrastructure development company emphasizing on creating values of reliability, responsibility and global standards. The Company has proven track record of sustained development, growth, customer satisfaction and innovation. The Company's primary business is development of residential and commercial properties in affordable segment.

This CSR Policy aims to define and establish the Company’s Policy framework towards CSR.

2. OBJECTIVES

The objective of this policy is to define the overall framework for CSR which will be applied by the Company in due course of time. The Company is committed towards making visible and tangible contribution to communities and environment. The policy is being framed to achieve following social goals-

- To lay down the guiding principles, standards, codes and mechanisms to carry out the CSR Projects of the Company.
The Company shall identify activities both in urban/rural areas that will improve quality of life and actively support the country’s development agenda to ensure sustainable change;
- To ensure that all the CSR Projects are reported as per the format prescribed by Section 135 of the Act.
- To identify the areas of interventions and CSR activities which the Company will undertake as its core CSR initiatives.

The CSR Policy shall be implemented in accordance with the provisions of Section 135 of the Companies Act, 2013 and the Rules made thereunder. It shall apply to all the CSR Activities undertaken by the Company in India as per Schedule VII of the Act and any amendments or modifications thereto.

3. CORE CSR AREA

- (A) Eradicating hunger, poverty and malnutrition, promoting health care and making available safe drinking water.
- (B) 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
- (C) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.

4. DEFINITIONS

Definitions of some of the key terms used in this policy are given below:

- a) **'Act'** means The Companies Act, 2013 read with Rules made thereunder, as amended from time to time.
- b) **'Board'** means Board of Directors of the Company.
- c) **'Company'** means Signatureglobal (India) Limited.
- d) **'Corporate Social Responsibility'** or **'CSR'** means and includes but is not limited to—
 - (i) projects or programs relating to activities specified in Schedule VII of the Act; or
 - (ii) projects or programs relating to activities undertaken by the Board in pursuance to recommendations of the CSR Committee as per the CSR Policy of the Company, subject to the condition that the CSR Policy will cover subjects enumerated in Schedule VII of the Act.
- e) **'CSR Committee'** means CSR Committee of the Board.
- f) **'CSR Activities'** means projects/ programs/ activities to be undertaken by the Company in India, pursuant to Section 135 and Schedule VII of the Act.

The CSR activities shall not include activities undertaken by the Company in pursuance of the normal course of its business. Further, projects, programs or activities that solely benefit the employees of the Company and their families shall not be considered as CSR Activities under this CSR Policy.

- g) **'CSR Policy'** means this policy of the Company which relates to the activities to be undertaken by the Company pursuant to Section 135 and Schedule VII of the Act and matters incidental thereto including the expenditure thereon.
- h) **'Net Profit'** means Net Profit as defined in the Act.

Words and expressions not defined in this Policy shall have the same meaning as defined in the Act or Rules made thereunder from time to time.

5. **GUIDING AND PRINCIPAL FOR SELECTION OF CSR COMMITTEE**

In compliance with the requirements of Section 135(1) of the Act, a CSR Committee has been constituted by the Board. The CSR Committee at all times shall comprise a minimum of 3 directors out of which at least 1 director would be an independent director.

The Committee may invite such other executive(s)/employees of the Company, professionals, experts and outsiders with relevant experience, as it may consider appropriate in its sole discretion, whether on permanent basis or temporarily for meetings of the Committee, to advise on the various CSR Activities being undertaken/to be undertaken by the Company.

The CSR Committee shall institute transparent monitoring mechanism for implementation of the CSR Activities undertaken by the Company.

In adherence with the Section 135, of the Act a Corporate Social Responsibility Committee ("CSR Committee") has been constituted to govern and implement the CSR Projects.

The members of CSR Committee shall comprise such persons as may be decided by the Board from time to time in accordance with the applicable provisions of the Act.

6. **TERMS OF REFERENCE OF THE CSR COMMITTEE**

The Corporate Social Responsibility functions of the Company will be co-ordinated and monitored by the Board of Directors through Corporate Social Responsibility Committee.

The CSR Committee will be responsible for identifying appropriate opportunities for CSR as well as facilitating necessary processes for operationalizing the CSR activities.

Towards achievement of the CSR targets, the Corporate Social Responsibility Committee shall, *inter-alia*, have the following roles:-

1. Identify areas and opportunities for CSR activities within the broad framework outlined in this policy under the "Scope of Activities" given in Schedule VII;

2. Decide the manner of execution of CSR activities;
3. Design and draft a policy statement for CSR activities;
4. Selection of appropriate agencies/ NGO's for implementation of CSR activities on the lines of Companies Act,2013 and Rules & Regulations there under;
5. Formulate and recommend the Annual CSR plans in pursuance of CSR Policy covering the following aspects:
 - a) the list of approved CSR projects or programs to be undertaken in areas or subjects specified in Schedule VII to the Act;
 - b) the manner of execution of such projects or programs as specified in rule 4(1) of CSR Rules;
 - c) the modalities of utilisation of funds and implementation schedules for the projects or programs;
 - d) monitoring and reporting mechanism for the projects or programs; and
 - e) details of need and impact assessment, if any, for the projects
6. Review, co-ordinate and assist in operationalization of Annual CSR plans.
7. Such other acts, deeds and things as may be prescribed under the Act read with the Rules made thereunder and/or as may be mandated by the Board.

7. IMPLEMENTATION OF CSR ACTIVITIES

The CSR Activities identified by the CSR Committee and approved by the Board shall be implemented in a project mode through

- (a) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
- (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, 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.
- (e) such company/trust/society or any other entity as may be allowed under the Act and Rules made thereunder from time to time.

The Company may also conduct/implement its CSR Activities through any company established by the Company or its subsidiary(ies), or associate(s) under Section 8 of the Act or otherwise. In the event, the Company implement its CSR Activities through any other trust(s), society(ies), company(ies) that is not established by the Company or its subsidiary(ies) or associate(s), such trust(s), society(ies), company(ies) should have an established track record of at least three years in undertaking similar programs or projects and the Company will clearly specify the project or programs to be undertaken through these entities, the modalities of utilization of funds on such projects and programs and the monitoring and reporting mechanism.

In order to implement the approved CSR Activities, the Company may involve specialized agencies, which could include government/ semi- government/ autonomous organisations, educational institutions, professional consultancy organisations, registered voluntary organisations, or any other appropriate agency/authorities.

The Company may also collaborate or pool resources with its subsidiaries, or associates or other companies to undertake CSR Activities, provided that the CSR Committees of the respective companies are in a position to report separately on such CSR Activities being undertaken in accordance with the Act.

8. CSR ALLOCATION

The CSR Allocation for a financial year shall include –

- (a) at least 2% of the average Net Profits of the Company for the last three financial years;
- (b) Any income arising there from;
- (c) surplus arising out of CSR Activities; and
- (d) any contribution specifically received for CSR Activities. Further, it is clarified that any surplus arising out of CSR Activities shall not form part of the business profits.

9. CSR BUDGET

The overall amount to be committed towards CSR will be approved by the Board upon the recommendation of the CSR Committee. (“**CSR Budget**”)

10. REPORTING

The company will make a full report of its CSR projects / programmes undertaken during the previous year in the format prescribed for the “Annual Report on CSR Activities to be included in the Board’s Report” in the Companies (CSR Policy) Amendment Rules, 2021 which is in consonance with section 134(3)(o) of the Act as amended from time to time.

If the Company fails to spend the CSR Budget the Board shall specify the reasons for not spending the CSR Budget in the “Annual Report on CSR Activities to be included in the Board’s Report”. Provided, where such unspent CSR Budget to any ongoing project as specified under Section 135(6) of the Act, the Board shall transfer such unspent amount to a Fund specified in Schedule VII of the Act, within a period of six months of the expiry of the financial year.

In case the Company spends in any financial year, an amount in excess of required amount as prescribed under the Act or Rules made there under, such excess amount may be set off against the requirement of spending in the immediately succeeding three financial years as per the applicable provisions of the Act read with the Rules made thereunder as amended from time to time.

11. CSR ACTIVITIES

The Company may also undertake its CSR Activities in the following areas:

- I. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation;
- II. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- III. Promoting 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;
- IV. 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.
- V. 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;
- VI. Measures for the benefit of armed forces veterans, war widows and their dependents;
- VII. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- VIII. Contribution to the 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 schedule caste, tribes, other backward classes, minorities and women;
- IX. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);
- X. Rural development projects including community/social/infrastructure creation intended for the general well-being of society at large;

- XI. Slum area development including social infrastructure projects in urban areas aimed at improving the well-being and safety of the general public in such urban areas; and
- XII. Disaster management, including relief, rehabilitation and reconstruction activities.

The CSR Committee will be entitled to include other projects/ programs/activities or any social development initiatives as may be approved by the CSR Committee/Board which is in consonance with the Act read with Schedule VII.

The Company shall give preference to the local area and areas around it where it operates, for undertaking/implementing/executing/collaborating for CSR Activities.

12. MONITORING MECHANISM

The CSR Committee will ensure a transparent monitoring mechanism for ensuring effective implementation of the CSR Activities proposed to be undertaken by the Company.

The CSR Committee will ensure that the CSR Activities are undertaken in compliance with this CSR Policy and in a project or program mode with clearly defined project deliverables, implementation schedules, processes and budgets as mentioned above.

The CSR Committee will monitor the programs and projects to ensure that they are being carried out in compliance with this CSR Policy and the Act and in accordance with the approved budget.

13. CAPACITY BUILDING

The Company may build CSR capacities by providing suitable training to their own personnel as well as those of implementing agencies through institutions with established track record of at least three financial years.

14. DISCLOSURES

The CSR Committee shall prepare an annual report on CSR, in the format prescribed under the Act and such report shall be included in the Board's report annexed to the financial statements. The report shall be signed by the members of the CSR Committee and such other person as may be prescribed.

The Company shall host the contents of the CSR Policy on its website in such manner as may be prescribed.

15. AMENDMENTS

The CSR Committee is empowered to recommend amendments or modifications to the CSR Policy and such changes shall be placed before the Board for approval, subject to the provisions of the act.

Where the CSR Policy is in variance with the requirements of the Act, the provision of the Act shall prevail.

16. GENERAL

In case of any doubt with regard to any provision of the CSR Policy and also in respect of matters not covered herein, a reference to be made to the CSR Committee or to the Chairman of the CSR Committee. In all such matters, the interpretation and decision of the Chairman of the CSR Committee shall be final.