

CSR POLICY

1. CSR Policy

- i) SPR's policy is to conduct its business responsibly and improve the quality of life of people, especially in the society close to our area of operation, while creating long term value for all stake holders.
- ii) The above policy is applicable for all CSR projects/programmes undertaken by the company.

2. CSR Activities

- i) The company shall take up CSR projects and programmes that are listed under Schedule VII of the Companies Act, 2013.
- ii) The company will take up CSR projects and programmes in the following areas:-
 - a) Education
 - b) Health Care
 - c) Sanitation
 - d) Environment
 - e) Any other areas as approved by the CSR Committee/ Board
- iii) Projects aimed at persons from disadvantaged background or persons who are differently abled will have priority.
- iv) Based on the recommendation by the CSR Committee to the Board every year, the Board shall consider and approve the CSR plan for the year. Wherever required, the Board may also approve plan for specific projects for more than one year.

3. CSR Budget

- i) Every year, the company is required to spend atleast 2% of the net profits made by the company during immediately preceding 3 financial years.
- ii) Any surplus arising out of CSR activities shall not form part of business profits of the company and shall form part of CSR corpus.

4. Implementation

- i) A Central Department will be created for implementing CSR activities across the company.
The CSR Department will be headed by Shri R.B. Sharma supported by adequate personnel.
- ii) The CSR activities will be implemented, in any of the following manner:-
 - a) Directly
 - b) Collaborating with various organisations, which are registered as a Trust or a Section 8 company or Society or NGO or any other entity specialising in CSR activity.

- c) Collaborating with other companies or industry bodies like CII, FICCI, etc.
 - d) Contributing to various funds permitted under the Companies Act, 2013.
- iii) The CSR activities shall be carried out in a transparent and time bound manner.

5. **Monitoring**

- i) After the CSR plan is approved by the Board, the CSR cell will take steps for implementation of the CSR activities.
- ii) The progress on implementation of CSR activities will be reviewed by a Committee under the Chairmanship of Managing Director, on quarterly basis.
- iii) The CSR Committee shall review the progress on implementation of CSR activities on annual basis and submit progress report to the Board.

6. **General**

All or any provisions of this policy would be subject to revision/ amendment by the Board of Directors of the Company based on the recommendations of CSR Committee or else in accordance with the guidelines on the subject as may be issued, from time to time.