

CORPORATE SOCIAL RESPONSIBILITY POLICY

CSR POLICY

Corporate Social Responsibility (CSR) Policy

Purpose:

The key purpose of this Policy is to:

- Outline the developmental areas in which Sasvitha Home Finance Limited shall get involved in through its CSR activities.
- Define governance structure for CSR management within Sasvitha Home Finance Limited.
- Serve as a guiding document in the identification, execution and monitoring of CSR projects.
- Describe the treatment of surpluses from CSR activities.
- Frame a set of rules applicable to all employees.

Scope and Applicability

This Policy applies to all CSR projects that will be undertaken by Sasvitha Home Finance Limited and shall fulfil all the requirements of Section 135 of the Companies Act, 2013. Sasvitha Home Finance Limited shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act, 2013. This Policy will be periodically reviewed and updated in line with the relevant codes of legislation, and best practices that can be adopted by Sasvitha Home Finance Limited

CSR Policy is applicable to Sasvitha Home Finance Limited and its branches that are mandated with the CSR expenditure obligations as per Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

This policy is owned by < Name of the Person > and reachable @ < Contact Number > and < email address >

Policy / Process

Alignment with Organisation Values

Sasvitha Home Finance Limited is guided by its core values that it has adopted since its inception. The CSR Policy is in alignment with its core values and is central to its CSR strategy.

Being Accountable for what we do: Sasvitha Home Finance Limited strongly believes that it is accountable for contributing back in a meaningful way to society.

For the execution of its CSR objectives and to make a positive impact with its CSR activities, Sasvitha Home Finance Limited desires to involve its employees too in an effort to create a sense of involvement and bring about social responsibility amongst them. Wherever necessary, Sasvitha Home Finance Limited will partner and collaborate with NGOs / other similar organisations that have experience, knowledge and a wider reach to meet its CSR objectives.

Areas of Focus

Companies can opt for specific areas of their interest and budget availability out of the areas listed below:

Sasvitha Home Finance Limited has broadly selected the number of areas of focus under its CSR activities, as under.

Education:

Promoting education, including special education and employment enhancing vocation skills, especially among the lower strata or poorer sections of the society or of the differently-abled adults or eligible children towards their livelihood enhancement projects.

Environment Sustainability:

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.

Health and other Welfare

- Providing medical relief and rehabilitation to communities who either don't have access to quality health care or cannot afford it;
- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old-age homes, day-care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- Measures for the benefit of armed forces veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognised sports, Paralympics sports and Olympic sports;
- 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 Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;

- Contributions or funds provided to technology incubators located within academic institutions that are approved by the Central Government;
- Rural development projects;
- Slum area development. Explanation for the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

Emergencies and Natural Calamities

Organisation shall provide relief, support, rehabilitation, etc., in case of natural calamities or emergencies.

Governance Structure

A governance structure at Sasvitha Home Finance Limited is responsible for implementing and administering CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013.

The Board of Directors of both the Companies (Sasvitha Home Finance Limited and < CSR Partner Company >) are ultimately accountable for the CSR projects undertaken by Organisation.

Sasvitha Home Finance Limited has constituted a CSR Committee at the Board level. The CSR Committee is supported by the CSR Team, comprised representatives from both these companies.

CSR Committee

Organisation has constituted the Corporate Social Responsibility Committee (the "CSR Committee") in line with Section 135 of the Companies Act, 2013 (the "Act"). The CSR Committee consists of the following members of the Board:

- <Director_1>
- <Director_2>
- <Director 3>

The CSR Committee of Sasvitha Home Finance Limited shall be responsible for:

- Review of CSR activities in the Company.
- Formulation of CSR Policy.
- Monitoring of implementation of CSR Policy.
- Making recommendations to the Board and modifications to CSR Policy as and when required.
- Apprise the Board of the CSR expenditure done during the year.

CSR Team

Dedicated CSR team shall be constituted from among the employees at Sasvitha Home Finance Limited, for implementing the CSR Policy and shall work under the guidance of CSR Committee and will be mainly responsible for:

- Execution of CSR Policy.
- Identifying projects and key initiatives pursuant to CSR Policy.
- Facilitating allocation of funds to the projects as identified for CSR activities.
- Monitoring CSR Projects to establish effectiveness of CSR efforts and apprise the same to CSR Committee.
- Compilation of information & preparation of Annual Reports on CSR activities and presenting the same to CSR Committee.
- Any other activity necessary to ensure achievement of CSR objectives.

CSR Budget

The total budget for the CSR projects in each financial year will be decided by the CSR Committee in accordance with applicable provisions of the Act and the CSR Rules. The CSR Committee shall propose to distribute the budget among the Areas to Focus or such of them as the CSR Committee may deem fit in each financial year, in such proportion and in a manner that meets the objectives of the CSR Policy.

For any reason, if the CSR team is not able to follow the allocation agreed on in any of the Areas to Focus described above, the same shall be utilised in such other Areas to Focus as the CSR team may recommend with the reasons therefore, and the CSR Committee may approve.

Implementation Process

CSR Contributions

Sasvitha Home Finance Limited will endeavour to contribute and spend at least 2% of the average net profits of Sasvitha Home Finance Limited made during the three immediately preceding financial years or such amount as may be recommended by the CSR Committee from time to time in pursuance of this Policy.

Compliance, Monitoring and Reporting

Compliance

The CSR Team will plan, implement, monitor and manage all CSR projects & activities for Sasvitha Home Finance Limited and will work closely with the CSR Committees of the Boards of Sasvitha Home Finance Limited and the Group companies as applicable.

The CSR Team will formulate implementation plans for the projects by clearly defining the following:

- Activities to be undertaken.
- Budgets proposed.
- Time frame for implementation.
- Responsibilities and authorities for implementation.
- Results expected to be achieved post-implementation

Monitoring

Milestones will be decided for every project/activity undertaken, and the progress will be evaluated against the milestones defined in the implementation plan for each project/activity. The CSR Team will monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports etc. Sasvitha Home Finance Limited will establish mechanisms to track data and monitor projects so that the CSR projects undertaken are implemented transparently and efficiently.

Reporting

The CSR Committee of the Board, based on reports presented by the CSR Team, will annually publish a report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by Section 135 of the Companies Act 2013.

The CSR Committee shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR Policy is in compliance with the approved Corporate Social Responsibility CSR Policy of Sasvitha Home Finance Limited.

The CSR Policy on being approved by the Board shall be displayed on the website of Sasvitha Home Finance Limited and any modifications carried out from time to time shall also be updated on the website of Sasvitha Home Finance Limited respectively.

Treatment of Surplus

Any surplus generated from CSR projects undertaken w. e. f. Financial Year will be tracked and channelised into the CSR corpus. These funds will be further used in the development of the CSR projects and will not be added to the normal business profits.

Special Circumstance and Exception

Any Deviation from this policy has to be approved by HR. Any changes to the policy have to be approved by Legal and Compliance.

Non-compliance and Consequence

Violation of this overtime policy is subject to disciplinary action, up to and including termination. If an employee, including Floor Supervisor and/or Manager, is suspected of violating the policy, he/she must undergo a thorough investigation. The circumstances of each violation will determine the severity of each scenario.

Sl. No	Particulars	Version	Date of Revision
01	CSR Policy	01	24-12-2024