
POLICY FOR CORPORATE SOCIAL RESPONSIBILITY

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Corporate Social Responsibility:

Pursuant to Section 135 of the Companies Act, 2013 (the Act) read with the Companies (CSR Policy) Rules, 2014 (the Rules), the Company put in place the Corporate Social Responsibility Policy of STEER Engineering Private Limited (“CSR Policy”) for the Company as per approval given by the Board of Directors of the Company at its meeting held on 4th March 2021. The said Act and Rules in this regard have been substantially amended with effect from 22 January 2021, necessitating changes to be made in the CSR Policy.

Company Philosophy for CSR Policy:

STEER Engineering Private Limited (“the Company”) is focused on the development of advanced platform technologies and processes to improve the quality of life and change the way people live, eat and stay healthy through its vision to “STEER a new world”. The Company is committed in its responsibilities towards its environment and society. It aims to bring about a positive contribution to the society through effective implementation of its CSR activities.

The company welcomes the Government of India's decision to introduce a dedicated section for Corporate Social Responsibility (CSR) in the Companies Act, 2013. This legal framework provides a significant boost to corporate efforts in community development and social reform. By mandating CSR activities, the government has formally recognized the vital role corporations play in addressing societal challenges.

Key words & meanings:

1. “Act” shall mean the Companies Act 2013, including any modifications, amendments or re-enactment thereof.
2. “Approved Budget” shall mean the total budget as approved by the Board of the Company which is to be utilized for CSR Projects.
3. “Board” shall mean the Board of Directors of the Company.
4. “CSR Annual Plan” shall mean the annual plan detailing the CSR expenditure for the year.
5. “CSR Committee” means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Companies Act
6. “CSR Policy” shall mean the present Corporate Social Responsibility Policy of the Company, which covers the activities to be undertaken by the Company as specified in Schedule VII to the Act and the CSR Expenditure thereon.
7. “CSR Projects” or “Projects” means Corporate Social Responsibility projects/activities/ programs/ initiatives instituted in India, either new or ongoing, and include, but is not limited to those undertaken by the Board.
8. “Financial Year” shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.

9. "Net profit" shall mean the net profit as per Sec 135 of the Act and Rules based on which the specific percentage for CSR expenditure has to be calculated.
10. "Rules" shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re-enactment, modifications or amendments thereof.

Policy Objectives:

The objective of the CSR Policy ("Policy") is to lay down the guiding principles in undertaking various Programs and projects by or on behalf of the company relating to Corporate Social Responsibility ("CSR") within the meaning of section 135 of the Companies Act, 2013 read with Schedule VII of the Act and the CSR Policy Rules 2014 ("Rules").

CSR Activities:

The activities that the Company may undertake shall be (inter alia):

- i. eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- 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 centres 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 setup 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 arts and handicrafts;
- vi. measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- vii. training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- viii. contribution to the Prime Minister's National Relief Fund [or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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;

- ix. (a) contributions to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).]
- x. rural development projects;
- xi. slum area development ['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.];
- xii. disaster management, including relief, rehabilitation and reconstruction activities.

Any other activities which may be included by Ministry of Corporate Affairs (MCA) by way of any amendment to Schedule – VII or otherwise included by way of clarification, order or circulars by MCA.

The CSR projects or programs or activities undertaken by the Company as per the Company's CSR Policy shall amount to CSR Expenditure in accordance with the provisions of the Act.

CSR Committee Constitution:

As per Section 135 (9) of The Companies Act, 2013 the amount to be spent for CSR activities as provided in section 135 (5) does not exceed fifty lakh rupees hence there is no requirement for constitution of CSR Committee and the functions shall be discharged by the Board of Directors of company.

Role of the Board:

In absence of a CSR Committee, the Board shall directly discharge all CSR responsibilities as below

- i. The Board of Directors shall approve the CSR policy and the Annual CSR Action Plan of the company.

- ii. The Board of Directors shall endeavour that the Company spends 2% of the average net profits of the Company made during the 3 immediately preceding financial years in pursuance of its CSR Policy.
- iii. The Board of Directors of the Company shall disclose the CSR Policy, Projects and related information approved by the Board on their website, if any, for public access.
- iv. The Board may extend a non-ongoing project beyond one year based on reasonable justification.
- v. The Board shall ensure that the CSR activities are undertaken by the Company itself or through a registered and eligible Implementation Agency (as per rule 4 Companies (Corporate Social Responsibility Policy) Rules, 2014)
- vi. The Board of the Company shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- vii. In case of ongoing project, the Board of the Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- viii. The Board may alter the CSR Annual Action Plan at any time during the financial year.
- ix. The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.
- x. Where the Company spends an amount in excess of requirement, such excess amount may be set off by the Board against the requirement to spend up to immediate succeeding three financial years subject to the conditions that – (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any. (ii) the Board of the Company shall pass a resolution to that effect.

CSR Expenditure:

As per Section 135(5) company needs to spend average of 2% of its net profits of the company made during the three immediately preceding financial years, the calculations of same shall be placed and approved by the board.

Surplus arising, if any:

Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Transfer of unspent CSR amount:

Unspent amounts relating to ongoing projects shall be transferred within 30 days from the end of the financial year to a designated Unspent CSR Account.

These must be utilized within three financial years; else transferred to a Schedule VII fund within 30 days from end of the third year.

For non-ongoing projects, any unspent amount must be transferred to a Schedule VII fund within 6 months from the end of the financial year.

Display of CSR activities on its website:

As per Rule 9, the Company shall mandatorily disclose the CSR Policy and details of approved CSR projects on its website, if any.

Confidentiality:

All records, reports, and data relating to CSR projects and discussions thereon shall be treated with appropriate confidentiality. However, transparency and compliance with statutory disclosure shall be maintained.

Amendment of Policy:

The CSR Policy of the company may be amended at any time by the board of the company.

Date of Original adoption / Revision	Effective date of the Policy
27 th July 2018	27 th July 2018
Revised on 4th March, 2021	4th March, 2021
