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Corporate Social Responsibility Policy

PREAMBLE

India is a country of myriad contradictions. On the one hand, it has grown to be one of the largest economies in the world, and an increasingly important player in the emerging global order, on the other hand, it is still home to the largest number of people living in absolute poverty (even if the proportion of poor people has decreased) and the largest number of undernourished children. What emerges is a picture of uneven distribution of the benefits of growth which many believe, is the root cause of social unrest.

In accordance with Section 135 of the Companies Act, 2013 and the rules promulgated thereunder, the Board of Directors of Sangam (India) Limited has adopted this Corporate Social Responsibility Policy.

Sangam (India) Limited (SIL) is committed to operate and grow its business in a socially responsible way. Our vision is to grow our business whilst reducing the environmental impact of our operations and increasing our positive social impact.

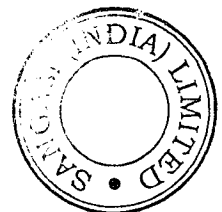
This policy outlines our Corporate Social Responsibility agenda. Our aim is to achieve responsible growth and we will inspire to bring this to life by encouraging people to take small everyday actions that will add up to make a big difference.

This revised policy has been amended with the approval of the Board of Directors on 09th August, 2018 and shall be effective from the same date.

PURPOSE

The key purpose of this policy is to:

- Define what CSR means to us and the approach adopted to achieve our Good & Green goals.
- Define the kind of projects that will come under the ambit of CSR.



- Identify broad areas of intervention in which the company will undertake projects.
- Serve as a guiding document to help execute and monitor CSR projects.
- Elucidate criteria for partner implementation agencies.
- Explain the manner in which the surpluses from CSR projects will be treated.

POLICY STATEMENT

The CSR Policy focuses on addressing critical social, environmental and economic needs of the marginalized/underprivileged sections of the society. Through this policy, we align our CSR strategy with the SIL's vision and goals. We adopt an approach that integrates the solutions to these problems into the strategies of the company to benefit the communities at large and create social and environmental impact.

SCOPE OF CSR ACTIVITIES IN SIL

As a practice, we classify only those projects that are over and above our normal course of business as CSR. This policy applies to all our CSR projects and it will be further reviewed and updated.

OUR CSR VISION

Through sustainable measures, actively contribute to the Social, Economic and Environmental Development of the community in which we Operate ensuring participation from the community and thereby create value for the nation.

Our CSR Mission

1. Ensuring socio-economic development of the community through different participatory and need- based initiatives in the best interest of the poor and deprived sections of the society so as to help them to become SELF-RELIANT and build a better tomorrow for themselves.



2. Ensuring environmental sustainability through ecological conservation and regeneration, protection & re growth of endangered plant species and promoting biodiversity.

The CSR activities we pursue will be in line with our stated Vision and Mission, focused not just around our plants and offices, but also in other geographies based on the needs of the communities.

The focus areas where special Community Development programmes will be run are:

1. Eradicating hunger, poverty and malnutrition
 - o Provision of food, nutrition supplement, clothes etc for the poor, children and other deprived sections of the society.
 - o Supporting nutrition in anganwadi centres and building capacities of anganwadi workers to this effect.
 - o Provision of shelter for homeless.
 - o Promoting sanitation, making available safe drinking water
2. Promoting Health care including Preventive Health care through awareness programmes, health check-ups, provision of medicine & treatment facilities , providing pre natal & post natal healthcare facilities, prevention of female foeticide through awareness creation, program for preventing diseases and building immunity.
3. Ensuring environmental sustainability and ecological balance through :
 - o Plantation drives in schools, villages, our manufacturing units & offices/business premises and other areas in general.
 - o Reviving endangered plants, promoting agro-forestry.
 - o Protection of flora & fauna.
 - o conservation of natural resources.
 - o Maintaining quality of soil, air & water.
 - o Adoption of wastelands to cultivate plants.
 - o Promoting biodiversity.
 - o Animal welfare and veterinary services.
 - o Technical support and Knowhow for improving farming and



- building capacities of small farmers.
- Promoting alternate energy resources.
- 4.** Employment and livelihood enhancing vocational skills and projects including tailoring, beautician, mehendi application, bee keeping, food processing and preservation, vermi-composting and other Life Skill Training and livelihood enhancement projects.
- 5.** Promotion of education especially among children, women, elderly and the differently abled including:
- Non-formal education programmes.
 - Supporting schools with infrastructure like benches, toilets, potable water, fans etc.
 - Supporting other educational institutions.
 - Improving educational facilities in general.
 - Supporting children for higher education.
- 6.** Promoting gender equality and empowering women including:
- Adult literacy for women.
 - Promoting and providing credit support to women's self-help and joint liability groups.
 - Training in vocations pursued by women.
 - Setting up homes for women & orphans;
 - Setting up old-age homes & other facilities for senior citizens
 - Setting up hostels for working and student women, day care centers for kids of working women
- 7.** Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government.
- 8.** Rural Development Projects.
- 9.** Other Activities
- Promotion of Sports with special focus on training for rural sports, nationally recognised sports, Paralympic sports, Olympic sports.
 - Welfare for differently disabled persons.
 - p Setting up public libraries.



- Reducing inequalities faced by the socially and economically backward groups.
- Protection of national heritage, art, culture and handicraft; Restoration of Buildings & sites of historical importance & works of art.
- Welfare of armed forces personnel, war widows and their dependents.

10. Incidental Activities.

- a. Employing people and incurring other costs to carry out aforesaid activities.

11. Such other activities as the Board may consider to be appropriate.

CSR FUNDS

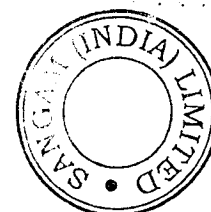
The corpus for the purpose of carrying on the aforesaid activities would include the followings:

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

MONITORING

The CSR department will provide regular progress report to the CSR Committee of the Board. This report would indicate:

1. Achievement since last progress report / during the last quarter in terms of coverage compared to the target and reasons for variance.
2. Achievement of the year-to-date in terms of coverage compared to the target, plans to overcome shortfalls if any and support required from the CSR Committee/Board to overcome the shortfalls.
3. Actual year-to-date spends compared to the budget and reasons for variance.



4. 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.

REPORTING

The Board shall receive periodic reports from the Committee on the status of the Company's implementation of specific CSR projects and programmes.

On an annual basis, the Board shall report to relevant stakeholders on the Company's CSR projects and programmes and related matters, as required by CSR Requirements.

AMENDMENTS TO CSR POLICY

The Committee shall review this CSR Policy on a periodic basis and shall update it as necessary or appropriate (subject to approval by the Board, if applicable) to ensure that it reflects CSR requirements as well as the current interests of the Company and relevant stakeholders.

