CORPORATE SOCIAL RESPONSIBILITY POLICY

This policy comprises a set of rules adopted by the Board of Directors of Surat Smart City Development Limited (“the Company”) which applies throughout the Company to all directors, officers and employees. These rules set the standards for the way we interact with society at large and the environment around us. They may be modified from time to time by additional policy statements and guidelines.

This policy clearly sets forth the Company’s social responsibility objectives and provides guidance on implementation of the policies set forth.

**Background of the policy**

The Corporate Social Responsibility Policy is formulated in compliance with the applicable provisions of the Companies Act 2013 and the rules made thereunder. Section 135 of the Companies Act 2013 and rules made thereunder, enumerate the constitution of the Corporate Social Responsibility (CSR) Committee and implementation of the CSR policy.

**Objective of the policy:**

The main objective of CSR policy is to make CSR a key business process for sustainable development of the society. **Surat Smart City Development Limited will act as a good corporate citizen and aims at supplementing the role of Government in enhancing the welfare measures of the society within the framework of its policy.**

**Composition of CSR Committee:**

The CSR Committee shall comprise of the following Directors:

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<thead>
<tr>
<th>Sr. No.</th>
<th>Name</th>
<th>Designation in SMC</th>
<th>Designation in SSCDL</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Shri. M. Thennarasan, IAS</td>
<td>Municipal Commissioner</td>
<td>Chairman &amp; Director</td>
</tr>
<tr>
<td>2</td>
<td>Shri C. Y. Bhatt</td>
<td>DMC</td>
<td>CEO &amp; Director</td>
</tr>
<tr>
<td>3</td>
<td>Shri B. I. Dalal</td>
<td>City Engineer</td>
<td>Director &amp; Member</td>
</tr>
<tr>
<td>4</td>
<td>Shri Bankim Desai</td>
<td>DMC (F)</td>
<td>Director &amp; Member</td>
</tr>
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Responsibility of CSR Committee:

The CSR Committee would be responsible:

1) To formulate and recommend to the Board the CSR policy which shall indicate the activities to be undertaken by the Company as per the Companies Act, 2013;
2) To review and recommend the amount of expenditure to be incurred on the CSR activities to be undertaken by the company;
3) To monitor the CSR policy and its activities of the Company from time to time;
4) Shall have full access to the information contained in the Company’s records and to seek information from any employee, as also to obtain such legal and professional advice as it may consider necessary.
5) Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors from time to time.

Corporate Social Responsibility Activities to be undertaken:

In the aforesaid context, policy on CSR of the Company is broadly framed for taking into account the following measures:

The CSR activities shall be undertaken by Company, as stated in this Policy, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business.

Company shall give preference to the local area or areas around it where it operates, for spending the amount earmarked for CSR activities. The CSR projects or programs or activities undertaken in India only shall amount to CSR expenditure.

Scope of Company’s CSR activities shall be governed by the provision of Schedule VII of Companies Act 2013 and rules made there under, in reference to Section 135 of Companies Act 2013 and shall includes following broad heads:

1. Eradicating hunger, poverty and malnutrition, promoting health care including 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.
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
3. 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.
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, 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.
5. 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.
6. Measures for the benefit of armed forces veterans, war widows and their dependants.
7. Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports.
8. 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, Tribes, other backward classes, minorities and women.
9. Contributions or funds provided to technology incubators located within academic institutions, which are approved by the Central Government.
11. Slum Area Development.
12. Disaster management, including relief, rehabilitation and reconstruction activities.
13. Any other projects, programs and activities falling within the permissible activities prescribed under Companies Act, 2013, rules made there under, any circular/notification/guidelines issued there under.

**Budgets:**

A specific budget shall be allocated for CSR activities and spending on CSR activities shall not be less than 2% of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this policy. In case Company fails to spend such amount, the Board shall specify the reasons for not spending the amount.
Approving authority for the CSR amount to be spent would be CEO and any one Director of the Company after due recommendation of CSR Committee and approval of the Board of Directors of the Company.

**Activities shall be excluded from the CSR expenditure of SSCDL:**

- Activities which are exclusively for the benefit of employees of the company or their family members;
- Activities undertaken in pursuance of normal course of business of the Company;
- Direct or indirect contribution to political parties;
- Expenditure on item/s not in conformity with Schedule VII of the Companies Act 2013;
- Surplus arising out of CSR projects shall not form part of the business profits of Company instead the same will be further used for CSR purposes only.

**Monitoring process of the activities undertaken**

The activities undertaken will be reported to the CSR Committee during the committee meetings. The financial and programmatic progress of CSR projects will be periodically report to the CSR committee.

**Policy Changes**

Changes to Company’s Corporate Social Responsibility Policy and any associated documents will occur from time to time. Any changes to the policy documents and/or their associated documents will be communicated via publication on the Company’s website.

The versions published on the Company’s website at the time of reference will be the authoritative version of these documents and will supersede any previously published versions of the same documents.