

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

CSR Vision: “Creating a Sustainable and Responsible business”

Sterling and Wilson (“SW”) is committed to enriching people’s lives. We take pride in being socially and environmentally responsible to our employees, stakeholders, vendors, and the world at large. Every precious resource utilized by us is accounted for and used optimally keeping in mind the greater good of society. For us, business is as much about integrating societal, economic, and environmental obligations as it is about creating value for our esteemed customers. In our own humble way, we strive to be the change we want to see.

CSR Objectives:

The Company may carry out any one or more of the CSR activities, notified under the Section 135 of the Companies Act, 2013 read with Schedule VII, inter-alia the following:

- **Improve Quality of Life:** Providing Safe Drinking Water, Sanitation, & Overall Health
- **Environmental Preservation:** Reducing Our Carbon Footprint, Increasing Green Cover, & Promote Bio-Diversity
- **Education and Skills Training:** Facilitating Underprivileged Children and Young Adults from Tribal Communities with Education and Skills Training
- **Inclusion:** Training and Earning Opportunity to Differently Challenged Youth, Alleviation of Poverty, Financial Inclusion For Migrant Labour Force

Further, the Company will review the sectors/activities from time to time and make additions/deletions/ clarifications to the above sectors/activities.

CSR Governance:

The Board of Directors of the Company has constituted a CSR Committee, consisting of three Directors. This Committee will be responsible for the following:

- (a) recommending to the Board a CSR policy, indicating the activities to be undertaken by the company;
- (b) recommending the expenditure to be incurred on the CSR activities;
- (c) monitoring the implementation of the activities included in the CSR policy; and
- (d) monitoring the spends on CSR activities by the Company in each financial year, in terms of the Companies Act, 2013.



SWs CSR initiatives can be implemented directly and / or through SP Group or SW Group or any other registered foundations, trusts, not for profit organizations with an appropriate track record, NGOs and local Government bodies for the purposes of accessing expertise/enhancing resources and for support in project implementation. Any surplus arising out of the CSR projects or programs shall not form the part of the business profits of the Company.

CSR Spend:

The Company shall spend not less than 2% of its annual net profits (calculated as per Section 198) during the three immediately preceding financial years on CSR Activities that fall under the categories specified under Schedule VII of the Act.

The Committee may, at its discretion, decided to spend more than 2% of its average profit Any project or programme benefiting only the employees of the Company or their families shall not be considered a CSR activity. The Committee shall ensure that any contribution made by the Company to any Foundation, trust, NGO or other entities is used for specified projects or programmes.

Reporting and publication of CSR Policy

- a. An annual CSR report will be included in the Directors Report as per the format prescribed under the Companies Act, 2013;
- b. The CSR Policy shall be displayed on the Company's website, if any.

Policy review and amendment

The Board of Directors may revise/ amend this CSR Policy based on the recommendations of the CSR committee from time to time, as may be required under the Companies Act, 2013 or the Rules framed thereunder.
