

CORPORATE SOCIAL RESPONSIBILITY POLICY

SWARAJ GREEN POWER AND FUEL LIMITED

A. CSR POLICY & PHILOSOPHY:

The Company is committed to operate and grow its business in a socially responsible way with a vision to be an environmental friendly corporate citizen. Social service, ecological balance and environmental protection are in our DNA. Company has taken up various Corporate Social Responsibility (CSR) initiatives earlier and will continue to do so in future.

CSR activities at Company reflect its commitment to make things happen at every project we undertake. Our passion in these activities make us more responsible year after year. As a responsible corporate citizen, we try to contribute for possible social, educational and environmental causes on a regular basis. We firmly believe that to succeed, an organisation must maintain highest standards of corporate behavior towards its investors, stakeholders, employees and societies in which it operates.

Constitution of a Corporate Social Responsibility Committee of the Board and formulation of a Corporate Social Responsibility Policy has become mandatory under the Companies Act, 2013. Accordingly, our Company has formulated this CSR Policy which encompasses its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs.

The Board of Directors ("**the Board**") of Swaraj Green Power and Fuel Limited (the "**Company**") has vide resolution of its board of directors dated May 24, 2025, adopted the following updated policy and the Board may amend this policy from time to time.

B. CSR VISION:

Improve quality of life for all our communities through integrated and sustainable development in every possible way.

C. CONSTITUTION & FUNCTIONS OF CSR COMMITTEE:

The CSR committee will consist of three or more Directors, out of which at least one director shall be an independent director. The CSR Committee shall, inter alia, carry out the following functions;

- a. To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in

areas or subject specified in Schedule VII of the Companies Act, 2013 and the rules made thereunder.

- b. To recommend the amount of expenditure to be incurred on the CSR activities.
- c. To monitor the implementation of framework of CSR Policy.
- d. To carry out any other function as mandated by the Board from time to time and / or enforced by any statutory notification, amendment or modification, as may be applicable, necessary or appropriate for performance of its duties.

D. DEFINITIONS:

In this Policy, unless the context otherwise requires;

- 1. “**Act**” shall mean the Companies Act, 2013 including any modifications, amendments or re-enactment thereof.
- 2. “**Rules**” shall mean the Companies (Corporate Social Responsibility) Rules, 2014, including any modifications, amendments or re-enactment thereof.
- 3. “**Financial Year**” shall mean the period beginning from 1stApril of every year to 31stMarch of the succeeding year.
- 4. “**Net Profit**” shall mean the net profit of a company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:-
 - (i) any profit arising from any overseas branch or branches of the company, whether operated as a separate company or otherwise; and
 - (ii) any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act: Provided that in case of a foreign company covered under these rules, net profit means the net profit of such company as per profit and loss account prepared in terms of clause (a) of sub-section (1) of section 381, read with section 198 of the Act;
- 5. “**Company**” shall mean Swaraj Green Power and Fuel Limited.
- 6. “**Agency**” or “**Agencies**” shall mean any Section 8 Company under the Act or a registered trust/society/Non-Government Organisation/Institution performing social services for the benefit of the society at large.
- 7. “**Board**” shall mean the Board of Directors of the Company.

8. **“Approved Budget”** shall mean the total budget as approved by the Board of the Company, which is to be spent or utilized for CSR activities.
9. **“Annual Plan”** shall mean the annual planned CSR expenditure for the year.
10. **“CSR Committee”** shall mean the Corporate Social Responsibility Committee as constituted by the Board of Directors of the Company in accordance with the Act and the Rules made there under, comprising of three or more Directors, out of which, at least one director shall be an Independent Director.
11. **“CSR Officer”** shall mean a person engaged by the Company to assist the CSR Committee to implement the CSR activities envisaged under the Policy.
12. **“CSR Policy”** means a statement containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan;

Words and expressions used and not defined in the Policy shall have the same meanings respectively assigned to them in the Act and / or Rules.

E. ROLE OF THE CSR COMMITTEE:

1. formulate and recommend to the Board, a “Corporate Social Responsibility Policy” which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013 and the rules made thereunder, as amended, monitor the implementation of the same from time to time, and make any revisions therein as and when decided by the Board;
2. identify corporate social responsibility policy partners and corporate social responsibility policy programmes;
3. review and recommend the amount of expenditure to be incurred on the activities referred to in clause (1) above and the distribution of the same to various corporate social responsibility programs undertaken by the Company;
4. delegate responsibilities to the corporate social responsibility team and supervise proper execution of all delegated responsibilities;
5. review and monitor the implementation of corporate social responsibility programmes and issuing necessary directions as required for proper implementation and timely completion of corporate social responsibility programmes;
6. any other matter as the Corporate Social Responsibility Committee may deem appropriate after approval of the Board or as may be directed by the Board, from time to time, and exercise such other powers as may be conferred upon the Corporate Social Responsibility Committee in terms of the provisions of Section 135 of the Companies

Act.

F. ROLE OF THE BOARD :

1. After taking into account the recommendations made by the CSR Committee, approve the CSR Policy for the Company.
2. Ensure that the CSR activities included in this Corporate Social Responsibility Policy are undertaken by the Company.
3. The Board of the Company may decide to undertake its CSR activities approved by the CSR Committee, through a registered trust or a registered society or a Company established under section 8 of the Act by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, or otherwise provided that – If such trust, society or company is not established by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, it shall have an established track record of three years in undertaking similar programs or projects/activities;
4. Ensure that in each financial year the Company spends at least 2% of the average net profits of the company made during the three immediate preceding financial years, calculated in accordance with Section 198 of the Act, in pursuance of its CSR policy. Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the Company where it operates,
5. As per Section 135 of the Act, specify the reasons for under spending the CSR amount in the Board's Report.

G. IMPLEMENTATION:

The Company shall undertake such CSR activities as stated by this CSR Policy in compliance with Rule 4(1) of the CSR Rules as amended from time to time. The Company can undertake CSR activities as listed in the Schedule VII of the Companies Act, 2013. These CSR activities shall be undertaken by the Company as projects or programs or activities (either new or ongoing) and will exclude activities undertaken in the normal course of its business.

The CSR activities undertaken will be in line with the activities specified in Schedule VII of the Companies Act, 2013 as amended or modified from time to time.

Thrust Areas: While the Company is eligible to undertake any suitable/rightful activity as specified in Schedule VII of the Act, however, at present, it proposes to undertake the relevant activities on priority basis in the following thrust areas:

- a. Providing emergency medical care, preventive healthcare, sanitization and safe drinking water.
- b. Promoting education to the under privileged children, supporting socially backward people and helping the differently abled people.
- c. Ensuring environmental sustainability, ecological balance, protection of flora and fauna and conservation of natural resources.
- d. Rural Development Projects including road development, constructions of gym or sport clubs, promoting gender equality and empowering women.
- e. Ensuring technical guidance in the form of animal management practice, optimal feed management, financial guidance to the farmers and various educational programme to help farmers increase their output.

The CSR activities shall be undertaken in only in India and preference shall be given to the local areas. However, this shall not bar the Company from pursuing its CSR activities in any other areas.

H. EXPENDITURE NOT COVERED OR RECOGNIZED:

In terms of the Rules, the following contributions shall not be considered as CSR Expenditure;

- a. Contributions of any amount, whether directly or indirectly, to any political party or any person associated with a political party.
- b. Amount spent, whether directly or indirectly, for the benefit of employees of the Company, its Subsidiaries and Associates and their families.
- c. Expenses incurred by the Company for the fulfillment of obligations any act /statute of regulations (such as labour laws, land acquisition act etc.)
- d. Expenses incurred by the Company for one of events such as marathons / awards /charitable contribution/advertisement/sponsorships of TV programs etc.
- e. Other contributions/ expenses not recognized under the Act / Rules as amended or modified, from time to time.

I. CSR MONITORING AND REPORTING RAMEWORK:

In compliance with the Act and to ensure funds spent on CSR Activities are creating the desired impact on the ground a comprehensive Monitoring and Reporting framework has been put in place.

The CSR Committee shall monitor the implementation of the CSR Policy through periodic reviews of the CSR activities.

The respective CSR personnel will present their annual budgets along with the list of approved CSR activities conducted by the Company to the CSR Committee together with the progress made from time to time as a part of the evaluation process under the monitoring mechanism.

The Board Report of a Company shall include an Annual Report on CSR containing particulars specified in Annexure to the CSR Rules as per the prescribed format.

J. CSR EXPENDITURE:

1. The board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.
2. The Company shall spend at least 2% of average Net Profit of preceding three financial years, net profit being calculated in accordance with provisions of section 198 of the Companies Act, 2013.
3. CSR expenditure includes all expenditure including contribution to corpus, the projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on any item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act.
4. The surplus if any, arising out of the Corporate Social Responsibility projects or programs or activities shall not form part of the Business Profit of the Company.
5. The amount spent by the Company in India, is only taken into consideration for CSR activities.
6. The Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities.
7. Where the Company fails to spend the stipulated amount in CSR activities, it shall provide for the reasons for not spending the amount, in Board's report and, unless the unspent amount relates to any ongoing project, transfer such unspent amount to a Fund specified in Schedule VII of the Companies Act, 2013, within a period of six months of the expiry of the financial year.
8. Also, if the Company spends an amount in excess of the requirements, then the Company may set off such excess amount against the requirement to spend for such number of succeeding financial years.

K. DISCLOSURE OF THE POLICY:

The CSR policy recommended by the CSR Committee and approved by the Board shall be displayed on the Company's website and shall be disclosed in the Board's report as well.

L. CSR REPORTING:

The Board Report of a Company shall include an Annual Report on CSR containing particulars specified in Annexure to the CSR Rules as per the prescribed format.

M. FREQUENCY OF MEETINGS:

The meetings of the Committee could be held at such periodic intervals as may be required.

N. QUORUM:

Minimum two (2) members shall constitute a quorum for the Committee meeting.

This version of the policy is effective from May 24, 2025 and supersedes all prior policies and communication on this matter.