

**CORPORATE SOCIAL
RESPONSIBILITY POLICY
(CSR POLICY)
OF
SAHANA SYSTEM LIMITED**

Short title & Applicability

Sahana System Limited (the 'Company') has developed its Corporate Social Responsibility Policy (the 'Policy') in accordance with section 135 of the Companies Act 2013 and the rules made there under.

This policy encompasses the company's commitment to create large environmental and societal value as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for the welfare & sustainable development to the community at large.

The Policy shall apply to all CSR programmes of the Company.

CSR Vision Statement

The core vision of the Company's CSR policy is to create a meaningful and a lasting contribution to the society from which it draws its resources by extending helping hand to the needy and the underprivileged through social projects.

Corporate Social Responsibility is the commitment of business to contribute for economic development that is sustainable, facilitating greater and more inclusive prosperity. It is the contribution of the corporate sector for philanthropic causes like education, health, water, environment and community welfare.

CSR Objectives

The Company will undertake social projects that benefit the rural communities and enhance the quality of life, health care of residents and their economic well-being in a focused manner, for maximum positive impact.

The Company will encourage and recognize its employees for volunteering in the community by serving and sharing their expertise and skill.

Validity of CSR Policy

The Board may amend the CSR policy as may be required from time to time.

CSR Programme Areas

The Company will focus primarily on the following programmes:

- Contributing to projects for eradication of hunger, poverty and malnutrition.
- Undertake projects promoting primary healthcare needs, hygiene and sanitation in

rural areas.

- Promoting education and employment, vocational training either directly by the company or by funding Non-Government Organizations (NGO's) / educational institutions / trusts / organizations involved in promotion of education.
- To educate and guide Indian farmers on recent agricultural practices, new products and technology solutions that can sustainably improve crop and livestock yields and ensure animal welfare.
- Provide contribution to technology incubators located within academic institutions which are approved by the Central Government for improving technology in dairy industry for sustainable benefit of the society at large.
- Contribution to projects relating to water supply including making available safe drinking water.
- Ensuring environmental sustainability by contributing to projects relating to protection of environment, agro forestry, conservation of natural resources etc.
- Contribution to the Prime Minister's National Relief Fund, Prime Minister's Central assistance and relief in emergency situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio economic development.
- Infrastructure development by way of contribution to rural electricity projects, renewable energy by providing solar lights, laying and maintaining roads etc.
- Contribution to projects relating to slum area developments either directly or through NGOs.
- Grant / donation / financial assistance / sponsorship to reputed Trusts and NGOs for disaster management including relief, rehabilitation and reconstruction activities and society upliftment.

The CSR committee is authorized to consider also other CSR activities which are not included in this list.

CSR Budget

The Board shall ensure that the company spends at least 2% of its average Net Profits calculated as per Sec-198 of the Companies Act, 2013, as its Annual CSR Budget in each Financial Year to be incurred on identified areas.

Allocation of the Annual Budget for CSR activities in any given year shall be as per the provisions of the Companies Act 2013 and rules made thereof as amended from time to time.

Implementation Process

- The Company's projects will be implemented in a time-bound manner with clear objectives, plan, targets and robust monitoring and evaluation mechanisms.
- The Company's ongoing CSR projects will be aligned to the Policy.
- The mode of implementation of project activities identified under CSR include a combination of direct implementation by the Company under Approved Projects or through specialized agencies, which could include the Trust of the Company, Voluntary Organizations (NGO's), Recognized Institutes /Academic Institutions, Trusts, Registered Societies, Business Partners, Self Help Groups, Mahila Mandals, Professional Consultancy organization etc.
- For CSR projects, the time-frame and periodic milestones should be finalized at the time of approval of the Project.
- The Company will use services of expert agencies, consultancy firms etc. wherever required for carrying out base line surveys, guidance on project design and implementation, impact assessment surveys etc.
- For CSR projects, the time-frame and periodic milestones should be finalized at the time of approval of the Project.
- The heads of the respective teams managing CSR projects will be authorised to sign memorandum of understanding (MOUs)/ Agreements with the implementing partners after taking approvals.

Roles and responsibilities

The Board:

The Board of Directors of the Company will be responsible for:

- Approval of the CSR Policy of the Company.
- Disclosing the content of the Policy in its report and place the Policy on the Company's website in such a manner as prescribed under Section 135 of the Companies Act 2013 read with the CSR Rules.
- Ensuring that the social projects included in the Policy are undertaken by the Company.
- Ensuring that the Company spends, in every financial year, atleast 2% of the average net profits of the Company made during the three immediately preceding financial years in pursuance of the Policy.
- Ensuring that it specifies the reasons in its report for not spending the earmarked amount in case the Company fails to spend such amount

CSR Committee:

Composition of the CSR committee:

The composition of the CSR Committee of the Board is as under.

1. Ms. Hetal Pratikbhai Kakadiya, Chairperson
2. Ms. Dharmishtha Prashant Patel, Member
3. Mr. Jinang Dineshkumar Shah, Member

The Board shall have the power to make any change(s) in the constitution of the Committee.

CSR Committee Meeting:

The Committee shall hold a meeting as and when required, to discuss various issues on implementation of CSR Policy of the Company. The members would thrive to hold atleast one (1) Meetings in a Year.

Quorum:

The Quorum for a meeting of Committee on CSR shall be one third of its total Strength (any fraction containing in that one-third being rounded off as one), or two members, whichever is higher.

Responsibility of CSR Committee:

- Formulate and recommend the CSR Policy to the Board for approval. The Committee shall indicate the projects to be undertaken by the Company as specified in Schedule VII.
- Monitor the Policy from time to time and recommend changes to the Board.
- Recommend the amount of expenditure to be incurred on CSR projects.
- Institute a transparent monitoring mechanism for ensuring implementation of the social projects undertaken by the Company

Monitoring and Reporting

Project monitoring

The Company will institute a well-defined monitoring and evaluation mechanism to ensure that each social project has:

- Clear objectives developed out of the societal needs that are determined through baseline studies and research.
- Clear targets, time lines and measureable parameters wherever possible.

- A progress monitoring and reporting framework that is aligned with the requirements of section 135 of the Companies Act and the CSR Rules.

The CSR progress monitoring authorities and the frequency of review is given below.

Sr. No.	CSR Progress Review and Monitoring Authority	Frequency of review
1	Board of Directors	Annually
2	CSR Committee	Annually

Budget monitoring:

The Company will establish an accounting system to ensure project wise accounting of CSR spends.

Reporting framework:

- The Company will monitor progress on CSR projects and CSR spend and report to the management annually.
- The Company will report CSR performance in its annual report as per the structure and format prescribed in the notified CSR Rules.

Conclusion

In case of any doubt with regard to any provision(s) of the policy, a reference can be made to CSR Committee of Board of Directors. In all such matters, the interpretation & decision of the CSR committee of the Board of Directors shall be final.

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines as may be issued by Government, from time to time.

The Board will review the policy from time to time based on changing needs and aspirations of the target beneficiaries and make suitable modifications, as may be necessary.