

CORPORATE SOCIAL RESPONSIBILITY POLICY

OF

**SIGNATUREGLOBAL COMTRADE
PRIVATE LIMITED**

Introduction/Preamble

Involvement of Corporate bodies in CSR activities is not a new concept in India. Many Industries are serving the society in social development activities since long back. However, the Companies Act, 2013 has brought it under the legal purview. It mandates qualifying Companies to constitute Corporate Social Responsibility Committee to effectively monitor CSR activities of the Company. Further the Companies (Corporate Social Responsibility Policy) Rules, 2014 and Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 lays down the framework and modalities for carrying out CSR activities which are specified in Schedule VII of the Companies Act, 2013.

As an integral part of our commitment to Good Corporate Citizenship, we believe in actively assisting in improvement of the quality of life of people in communities, giving preference to local areas around our business operations.

Signatureglobal Comtrade Private Limited believes that CSR means paying back to the society at large and to the nation and opening the wings beyond the business.

Objective and Scope/Vision

Objective

The main objective of the CSR Policy is to lay down guidelines to make CSR as one of the key focus areas to adhere to global interest in environment and society that focuses on making a positive contribution to society through effective impact and sustainable development programs.

This Policy covers the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Act as amended from time to time.

The main objectives of Company's CSR policy are:

- To lay down guidelines to make CSR a key business process for sustainable development of the society.
- To directly/indirectly undertake projects/programs which will enhance the quality of life and economic well-being of the communities in and around our sites and society at large.
- To contribute towards development of knowledge-based economy by discharging corporate social responsibilities that would positively impact on customers, employees,

shareholders, communities and other stakeholders in various aspects of its operations.

Scope & Coverage

The CSR activities of the Company shall include, but not limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 amended from time to time. Further, the Company will review the sectors/activities from time to time and make additions/ deletions/ clarifications to the above sectors/activities.

Constitution of CSR Committee

CSR Committee of the Board of Directors ("Board") would consist of 3 or more directors, out of which at least 1 director shall be an Independent Director. However, CSR Committee of the Board of Directors ("Board") may consist of 2 or more Directors where the Company is not required to appoint any Independent Director

CSR Committee shall be formed as per the applicable laws and the committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy.

Name of Members:

- (i) Mr. Naresh Mittal, Director (Chairperson of the Committee)
- (ii) Mr. Om Mittal, Director (Member of the Committee)

Role of the Committee include

- i) Drafting of the CSR policy and recommend the same to the Board for approval.
- ii) Review and recommend any new CSR initiatives to be taken up by the company including the selection/appointment of implementation agencies.
- iii) Review the progress of CSR projects already undertaken by the company and the utilization of budgets for each such project.
- iv) Review and recommend the CSR report to be included in the board's report.

- v) Review and recommend any amendments to be made in the CSR policy of the Company.
- vi) To carry such other functions as may be delegated to it by the board relating to CSR activities of the company.

CSR Activities

The scope of the CSR activities of the Company will cover the following areas but not limited to the same and may extend to other specific projects/ programs as permitted under the law from time to time.

The CSR Activity may be done by the Company itself or through-

- (a) A Company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
- (b) A company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State government; or
- (c) Any entity established under an Act of Parliament or a State Legislature; or
- (d) A company established under section 8 of the Act, or a registered public trust or a society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Further the Following area of activity may be covered for CSR Activity.

- i) 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.
- ii) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.

- iii) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- iv) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, 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.
- v) 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 art and handicrafts.
- vi) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows.
- vii) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.
- viii) Contribution to the prime minister's national relief fund 8[or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine

aimed at promoting Sustainable Development Goals (SDGs).

- x) Rural development projects.
- xi) Slum area development.
- xii) Disaster management, including relief, rehabilitation and reconstruction activities.

Sources of Funding

- i) The Board shall ensure that the administrative overheads shall not exceed 5% of total CSR expenditure of the company for the financial year.
- ii) The Board shall endeavor to spend at least 2% of the average net profit during the preceding 3 financial years on CSR activities as enumerated above. The Net profit for the purpose of allocation towards CSR means profit more fully described under Rule 2(f) of the CSR Amendment Rules 2021.
- iii) Any surplus arising out of CSR activities shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of 6 months of the expiry of the financial year.
- iv) Any excess amount may be set off against the requirement to spend up to immediate succeeding 3 financial years' subject to the conditions that;
 - the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of this rule
 - the Board of the company shall pass a resolution to that effect.

Exclusion from CSR

The following activity shall not form part of the CSR activities of the Company: -

- i) Activities undertaken in pursuance of normal course of business of the company:

Provided that any company engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for

Financial years 2021-22, 2022-23, 2023- 24 subject to the conditions that

- (a) Such research and development activities shall be carried out in collaboration with any of the institutes or organizations mentioned in item (ix) of Schedule VII to the Act
- (b) Details of such activity shall be disclosed separately in the Annual report on CSR included in the Board's Report.
- ii) Any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
- iii) Contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- iv) Activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
- v) Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- vi) Activities carried out for fulfillment of any other statutory obligations under any law in force in India;

Implementation

- i) The CSR committee shall establish a transparent monitoring mechanism for implementation of the CSR activities or programs undertaken by the company.

The CSR plan and the budget shall be placed before the board together with the recommendations of the CSR committee for approval. The company will provide funding only to such projects as may be approved by the board.

- ii) The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely: -
- (a) the list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - (b) the manner of execution of such projects or programs as specified in sub-rule (1) of rule 4;
 - (c) the modalities of utilization of funds and implementation schedules for the projects or programs;
 - (d) Monitoring and reporting mechanism for the projects or programs; and
 - (e) details of need and impact assessment, if any, for the projects undertaken by the company:

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

Monitoring, Reporting & Disclosures

There is no prescribed number of meetings under the Act. However, considering the major agenda being fixation and allocation of budget and monitoring the CSR activities on which the company has spent funds, the number of meetings should be such so as to allow the fulfillment of the basic agenda of the committee. The Quorum of the meeting shall be quorum for Board meetings under section 174 of the Act, 2013.

The CSR Committee will be responsible for the monitoring CSR activities and report to the Board from time to time.

It is mandatory for the Company to disclose its CSR Policy, programs/projects undertaken and the expenditure made towards CSR activity in the Board's report forming part of annual report as per the format prescribed in the annexure given in the CSR Amendment Rules 2021.

The Board of Directors of the Company shall mandatorily disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.

Amendment of Policy

CSR Policy is subject to revision/amendment in accordance with the guidelines as may be issued by the Government, from time to time.

The Board may 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.

On behalf of Signatureglobal Comtrade Private Limited

**SD/-
NARESH MITTAL
DIRECTOR
DIN:00890765**