SUNTEK AXPRESS INDIA LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Section 135 of the Companies Act, 2013 ("Act") read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("Rules")

Corporate Social Responsibility Policy

1. Introduction

Section 135 of the Companies Act, 2013 ("**Act**") read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("**Rules**"), as amended from time to time, requires every company having net worth of INR 500 crore or more, or turnover of INR 1000 crore or more or net profit of INR 5 Crores or more during the immediately preceding financial year, to formulate and implement a Corporate Social Responsibility Policy indicating the activities to be undertaken by the company as specified in Schedule VII of the Act. Accordingly, the Board of Directors ("**Board**") of Suntek Axpress India Limited ("**Company**"), upon the recommendation of the Corporate Social Responsibility Committee ("**CSR Committee**"), has adopted this Corporate Social Responsibility Policy ("**Policy**") on [•], which shall come into force with effect from the same date.

2. Policy Objective

The Company recognizes that Corporate Social Responsibility ("CSR") activities play an important role in contributing to sustainable development of society and the environment and may involve strategic decision-making with long-term impact. The Company understands the significance of inclusive growth and wellbeing of all the stakeholders, including the society at large and nature around it. The Company advocates that as we all derive economic benefits from the society at large and nature around us, it is quite pertinent, fair, and rational to pay back as much as we can to the society and the nature. The Company, being a corporate citizen, is not immune to it. This Policy is framed primarily to ensure proper governance, implementation, and reporting of CSR activities undertaken by the Company in accordance with its social objectives in compliance with the provisions of the Act read with the Rules.

This Policy outlines the broad approach and direction of the Board of Directors of the Company taking into account the recommendations of its Corporate Social Responsibility Committee and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

3. Definitions

a) 'Act' means the Companies Act, 2013

b) 'Board' means the Board of Directors of Suntek Axpress India Limited;

c) "Corporate Social Responsibility Committee" or "Committee" means the Committee constituted by the Board of the Company under the applicable provisions of the Act.

d) 'Corporate Social Responsibility (CSR)' means the activities undertaken by the Company in pursuance of its statutory obligation laid down in Section 135 of the Act in accordance with the provisions contained in the Rules, but shall not include the following, namely:-

- activities undertaken in pursuance of normal course of business of the Company:
- 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.
- contribution of any amount directly or indirectly to any political party under Section 182 of the Act;
- activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019;
- activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- activities carried out for fulfilment of any other statutory obligations under any law in force in India;

e) 'CSR Projects/ Activities' means the CSR activities, programs, projects undertaken as per Schedule VII of the Act read with this Policy.

f) "Net Profits" means the net profit of the Company as per its financial statements prepared in accordance with Section 198 of the Act and shall not include such sums as prescribed under the Rules.

g) "Ongoing Project" means a multi-year project undertaken by the Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification.

Unless the context otherwise requires, words and expressions used in this Policy and not defined herein but defined in the Act and Rules made thereunder, as may be amended from time to time, shall have the meaning respectively assigned to them therein.

4. Role and Responsibilities

A) CSR Committee

The CSR Committee shall be, inter-alia, responsible for:

i) Formulating and recommending to the Board an Annual Action Plan or any alteration thereto in pursuance of Company's CSR policy, which shall include the following, namely:

a) the list of CSR Activities that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;

b) the manner of execution of CSR Projects;

c) the modalities of utilisation of funds and implementation schedules for the CSR Activities;

d) monitoring and reporting mechanism for the CSR Activities; and

e) details of need and impact assessment, if any, for the CSR Activities undertaken by the Company:

ii) Formulating Company's CSR Policy and making modifications, amendments, clarifications, deletions to the Policy, as and when considered necessary, in accordance with the provisions of the Act and Rules and recommending the same to the Board for its approval;

iii) Recommending the budget and amount of expenditure to be incurred in a Financial Year by the Company on CSR Activities;

iv) Identification and specification of CSR Activities to be undertaken along with identification of the implementing agency for such activities (as may be relevant);

v) Instituting a transparent monitoring mechanism for implementation of the CSR Activities undertaken by the Company and proper utilization of funds;

vi) Recommend to appoint the impact assessment agency;

vii) Recommend International Organizations for designing, monitoring and evaluation of the CSR Activities as per this Policy as well as for capacity building of Company's own personnel for CSR

viii) Periodically review the progress being made in the approved CSR Activities; and

ix) Any other activities / functions, as may be assigned by the Board.

B) Board

The Board shall be, inter-alia, responsible for:

i) Approval of Annual Action Plan or any alteration thereto based on reasonable justification to that effect, in pursuance of Company's CSR policy.

ii) Approval of CSR Policy and making modifications, amendments, clarifications, deletions to the Policy, as and when considered necessary.

iii) Approval of budget and amount of expenditure to be incurred in a Financial Year by the Company on CSR Activities.

iv) Approval of identification of the implementing agency for such activities (as may be relevant);

v) Approval of instituting a transparent monitoring mechanism for implementation of the CSR Activities undertaken by the Company and proper utilization of funds;

vi) Approval of appointment of the impact assessment agency;

vii) Approval of appointing International Organizations for designing, monitoring and evaluation of the CSR Activities as per this Policy as well as for capacity building of Company's own personnel for CSR.

5. Implementation and monitoring of CSR Activities

The CSR Activities shall be undertaken by the Company as per this CSR Policy by way of projects or programs or activities (either onetime or ongoing) in India, excluding the activities undertaken in pursuance of the normal course of business. The Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR Activities.

The Board may decide to undertake CSR Activities approved by the Board:

a) on its own; or

b) through a registered public trust or a registered society or a company established by the Company under Section 8 of the Act and subject to conditions as specified in the Rules; or

c) 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 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 registered society having an established track record of at least 3 (three) years in undertaking similar activities and subject to conditions as specified in the Rules.

Suitable documents/agreements shall be entered into by the Company with other entities, societies, agencies or companies for the purposes of implementation of the CSR Activities. The conditions of grant of amounts to such entities, societies, agencies or companies, the break-up of allocations and monitoring methodology shall be set out in such documents/ agreements and evaluated from time to time.

The Company may also collaborate with other companies including its subsidiary and associate companies for undertaking CSR Activities in such a manner that the CSR Committee of respective companies are in a position to report separately on such CSR Activities in accordance with the Rules read with this Policy.

The CSR Committee shall implement a transparent monitoring mechanism to ensure that the CSR Activities are being carried out in compliance with this Policy, the Act and in accordance with the approved budget, implementation schedules and processes.

The Board shall also ensure that the funds disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer ("CFO") or person responsible for financial management (where CFO is not appointed) of the Company shall certify to this effect.

In case of Ongoing Project, the CSR Committee shall monitor the implementation of the CSR Project with reference to the approved timelines and year-wise allocation and may recommend modifications, if any, for smooth implementation of the said project within the overall permissible time period.

The Company shall carry out the impact assessment of the CSR Activities undertaken by it, wherever applicable as per the applicable provisions of the Act and Rules.

6. CSR Expenditure, Allocation and Disbursement of Funds

The CSR Committee shall recommend the amount of expenditure to be incurred on the CSR Activities to be undertaken by the Company, for the consideration and approval of the Board.

The Board shall ensure that the Company spends, in every financial year, a minimum of 2% (two percent) of the average Net Profits of the Company made during the 3 (three) immediately preceding financial years in compliance with the provisions of the Act and in pursuance of this Policy. The overall CSR expenditure shall be approved by the Board based on the recommendations of the CSR Committee.

While approving any CSR Projects, the Board of the Company shall determine whether it will be an Ongoing Project or otherwise.

In case of an Ongoing Project, the Board shall lay down the following:

- Estimated budget outlay on CSR Projects during the course of its implementation.
- Estimated budget outlay during every financial year.
- Manner of implementation.

In case of CSR Projects, which are not Ongoing Projects, the Board shall endeavour to spend the complete such CSR Projects during the relevant financial year. In case for any reason(s), such CSR Projects will go beyond one year then Board shall re-categories such CSR Projects as Ongoing Projects for smooth implementation of the project within the overall permissible time period.

The Board shall also ensure that:

a) the administrative overheads shall not exceed 5% (five percent) of total CSR expenditure of the Company for the financial year;

b) Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company and 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 six months of the expiry of the financial year, as may be applicable; and

c) If the Company spends an amount in excess of its CSR obligations, such excess amount may be set off against the requirement to spend on the future CSR obligation of the Company up to immediate succeeding 3 (three) Financial Years subject to the conditions that –

i) the excess amount available for set off shall not include the surplus arising out of the CSR activities; and

ii) the Board shall pass a resolution to that effect.

The CSR amount may be spent by the Company for creation or acquisition of a capital asset, which shall be held by -

a) company established under section 8 of the Act, or a registered public trust or registered society, having charitable objects and CSR Registration Number; or

b) beneficiaries of the CSR project(s), in the form of self-help groups, collectives, entities; or

c) a public authority.

In the event the Company fails to spend up to a minimum of 2% (two percent) of the average Net Profits of the 3 (three) immediately preceding financial years or such sum as may be prescribed or any part thereof on CSR Activities, the same shall be dealt with in accordance with the provisions of the Act.

7. CSR Activities

CSR Activities include:

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 vocational 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 centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;

iv) Ensuring environmental sustainability, ecological balances, 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 arts, setting up of public libraries, promotion and development of traditional arts 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 or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Schedule Castes, the Scheduled Tribes, other backward classes, minorities and women;

ix) Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

x) Rural development projects;

xi) Slum area development.

xii) disaster management, including relief, rehabilitation and reconstruction activities

The list of CSR Projects which the Company plans to undertake will fall within the purview of schedule VII of the Act.

8. Impact Assessment

The Company shall undertake impact assessment, through an independent agency, of their CSR Projects, if applicable under the Act and Rules.

The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR. Further, the Board on the recommendation of the CSR Committee shall appoint the impact assessment agency.

9. Reporting

The CSR Committee shall ensure that an annual report on CSR, in the format prescribed under the Act and the Rules, be included in the Board's Report. Further the composition of the CSR Committee, CSR Policy and CSR Projects approved by the Board shall be mandatorily disclosed on the website of the Company and be updated on regular intervals, for public access.

10. Disclosure

This Policy is disclosed on Company's website i.e. www.saml.in

11. Amendment/Review

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as it may deem appropriate. Any difficulties or ambiguities in the Policy will be resolved by the Board in line with the broad intent of the Policy. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy. All provisions of this Policy would be subject to revision / amendment in accordance with applicable laws from time to time. Any

subsequent amendment/modification in the applicable laws in this regard shall automatically apply to this Policy. In case any applicable law(s), amendment(s), clarification(s), circular(s) etc. enacted/issued by the relevant statutory, governmental and regulatory authorities are not consistent with the provisions laid down under this Policy, then such applicable law(s), amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder.

12. EFFECTIVE DATE

Provisions of the regulations under this policy shall be applicable from **2nd September 2026.**

.