



NEW SWAN MULTITECH LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

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1. VISION

To reach out to the marginalized and under privileged sections of society, and assist in their upliftment with a view to creating opportunities for them and strive towards a more equitable society.

2. THRUST AREAS

The following areas will receive specific focus:-

- a) Promoting Health Care including Preventive Health Care
- b) Education and Vocational Skill Development
- c) Environment
- d) Sanitation
- e) Any others that may be added from time to time

3. LOCALITIES

By and large, at least 100% of the CSR programs are executed in and around the areas close to the units. The priority focus would be in the upliftment of areas around the plant locations and provide programs suited to the needs of the local people there.

4. METHODOLOGY AND PROGRAMME IDENTIFICATION

People of the local community will be involved in decision making regarding programs to be undertaken. A detailed fact finding / survey of the area or community would be done to identify the critical needs and their prioritization. The survey would encompass various parameters such as health indicators, literacy levels, sustainable livelihood processes, population data, level of sanitation, state of infrastructure, among others.

Subsequently, based on the results of the survey and in discussion with the village panchayats/local authorities, projects will be shortlisted by the local CSR cell.

Projects once shortlisted are presented for approval to the CSR working Committee along with the budget and execution plan.

5. COMMUNITY ENGAGEMENT

The local cells will work very closely with the local community and involve them at all stages starting from the study for identification of the project, to implementation, to feedback- ensuring a 360 degree involvement and engagement.

6. EXTERNAL PARTNERSHIPS

Partnerships and collaboration with NGOs and various government agencies and bodies would be explored to ensure useful learning's and involvement when required from their experience. Public Private Partnership will be another means of engagement.

7. EMPLOYEE ENGAGEMENT

Employee participation is an important aspect for the development of responsible citizenship. The Company's Management encourages and motivates employees to spend time volunteering on CSR programs initiated by it.

8. CONTRIBUTION DURING NATURAL CALAMITIES

In times of national crisis such as during natural calamities etc., it is imperative for us to respond to emergency situations & disasters by providing timely help to affected victims and their families.

9. BUDGET

For achieving its CSR objectives Company will allocate 2% of its previous 3 years' Average Net Profit as its Annual CSR Budget.

10. MONITORING AND FEEDBACK

All projects will be monitored monthly during the CSR working committee meetings. Projects are assessed against targets and budgets. Wherever necessary, midcourse corrections will be made.

To measure the impact of the work done, a social satisfaction survey / audit will be carried out by an external agency annually.

The Company's CSR activities will be communicated through its website, annual reports and its in-house journals.

11. OVERNANCE STRUCTURE

A strong and transparent governance structure is in place to oversee the implementation of the CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013.

11.1 Board-level CSR Committee

CSR governance structure will be headed by the Board Level CSR committee that will be Ultimately responsible for the CSR projects undertaken.

11.1.1 Members:-

S. No.	Name of Director	Designation and Nature of directorship
1.	Mr. Upkar Singh	Chairman -Managing Director
2.	Mr. Ajay Kumar	Member -Independent Director
3.	Mr. Barunpreet Singh Ahuja	Member - Whole Time Director

11.1.2 Responsibilities

- Formulate and update our CSR Policy, which will be approved by the Board
- Suggest areas of intervention to the Board
- Approve projects that are in line with the CSR policy
- Put monitoring mechanisms in place to track the progress of each project
- Recommend the CSR expenditure to the Board for approval
- Meet at least once a year to review the progress made

11.2 CSR Working Committee

The role of the working committee is to prepare the roadmap, constitute local cells and allocate projects as well as monitor progress as per plan. They will report / give feedback to the CSR Committee for all CSR projects undertaken.

11.2.1 Members

S. No.	Name of Director	Designation and Nature of directorship
1.	Mr. Upkar Singh	Chairman -Managing Director
2.	Mr. Ajay Kumar	Member -Independent Director
3.	Mr. Barunpreet Singh Ahuja	Member - Whole Time Director

AMENDMENT

Any change in the Policy shall be approved by the Board of the Company. The Board shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. In case any provisions of the Policy are contrary to or inconsistent with

the provisions of the Companies Act, 2013, rules framed thereunder and Listing Regulations (“Statutory Provisions”), the provisions of Statutory Provisions shall prevail.

DISSEMINATION OF THE POLICY

The policy shall be hosted on the website of the Company i.e. <https://www.swanagro.in>

Effective Date: September 28, 2023

Date of Approval by Board of Directors: September 28, 2023