

CORPORATE SOCIAL RESPONSIBILITY POLICY

OF

STERLING ADDLIFE INDIA PRIVATE LIMITED

1. Introduction

The Board of Directors (the “Board”) of Sterling Addlife India Private Ltd. (the “Company”) has adopted the following policy and procedures with regard to Corporate Social Responsibility. The Board may review and amend this policy from time to time subject to the recommendations of Corporate Social Responsibility Committee.

2. Background

The Company’s Corporate Social Responsibility (CSR) policy is framed In accordance with the notification issued by the Ministry of Corporate Affairs’ dated 27th February 2014 under Section 135 of the Companies Act 2013 (“the Act”).

3. CSR Vision

The Company’s CSR vision is governed by trust, fairness and care and shall be based the below keystones:

- To actively initiate projects and/ or participate in projects to improve the imparting knowledge and education to the school going Students from all walks of Society.
- To actively initiate projects and/ or participate in projects to improve the life of people.
- Company will strive to provide vocational training to improve skills of people in the primarily unorganised sector.
- To carry out CSR activities as specified in Schedule VII of the Act, with emphasise in the areas of :
 - Women, Children and other disadvantaged person’s Welfare.
 - To provide encouragement and support to various selfless workers and institutions helping them.
 - Environmental preservation
- Company shall manage its operations using principles of Sustainable development to minimize impact on environment and protect health & safety of all stakeholders.

4. CSR Committee and its Role

CSR committee of the Company comprises of two members; of which one is an Independent Director. The present composition of the CSR committee consists of the following members of the Board.

Sr. No.	Name of Director	Designation
1	Mr. Arpit G. Patel	Chairman
2	Mr. Devendra N. Patel	Director
3	Mr. Nilesh Mehta	Director

Mr. Arpit G. Patel is the Chairman of the CSR Committee. Both the members of CSR committee have rich and varied experience and are directly or indirectly involved in the CSR activities at different levels.

CSR committee formed by the Company shall work in co-ordination and in accordance with directions given by the Board from time to time.

Role of CSR Committee shall include *inter-alia* the following:

- Recommend, formulate and implement CSR activities approved by the Board and in compliance with Schedule VII of the Act.
- Specify projects and programmes that are to be undertaken, list out the programmes which Company plans to undertake during any financial year and specify the modalities of execution of CSR activities.
- Monitor and recommend the amount of CSR Expenditure to be incurred for CSR activities and to ensure it is in line with the CSR Policy.
- To monitor CSR Policy of Company from time to time.
- Any other activity as may be advised by the Board or as may be required by governing law or statute.

5. Implementation

The Company proposes to implement CSR Programs through Company personnel, contribution to any trust/fund/association focusing on CSR activities or through external implementing agencies. The Company will specify the CSR Programs which may be undertaken by those agencies in accordance with CSR policy of the Company and governing laws from time to time.

6. Monitoring/Review Mechanism

The monitoring and review mechanism shall be followed for the CSR initiatives, which shall ensure a top down review and delivery.

Regular review of amount spent on each activity and achievements against milestones and objectives by the CSR Committee to ensure a transparent monitoring process.

The management shall in consultation and through the supervision of the CSR Committee consider projects with detailed programmes to be undertaken, proposed amount, timeline and a confirmation that such projects are eligible under the Companies Act, 2013 and the rules made there under from time to time.

The Company will ensure that every program has :

- Clearly defined objectives
- Detailed progress monitoring system
- Impact assessment

The CSR Committee shall be responsible for overseeing the planning, coordination and implementation of CSR activities and compliance of the same shall be reported to board and the same shall be reported to stakeholders through the Company's Annual Report.

7. CSR Expenditure

CSR expenditure will include all expenditure as may be permitted under the applicable laws; including contribution to corpus for CSR Programs approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities as permitted under Schedule VII of the Act.

8. Reporting

The Board's Report of the Company shall include an annual report on CSR containing particulars specified in the annexure to the Companies (Corporate Social Responsibility Policy) Rules, 2014 pertaining to a financial year commencing from April 1, 2014.

9. Disclosures

The contents of the approved CSR Policy and any amendment thereto shall be disclosed in the Board's Report and displayed on the Company's website.

10. Amendments to the Policy

The Company is committed to continuously reviewing and updating policies and procedures related to CSR so that they are in conformity as legislative changes & amendments in Companies Act, 2013 from time to time.
