



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY OF SPORTA TECHNOLOGIES PRIVATE LIMITED



COMPOSITION OF CORPORATE SOCIAL RESPONSIBILITY COMMITTEE OF SPORTA TECHNOLOGIES PRIVATE LIMITED



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1. PREAMBLE

Sporta Technologies Private Limited (Company) recognizes the impact it has on communities in which it operates and believes that it has a tremendous opportunity to change the lives of these communities and aims to be a trusted partner contributing to the social, economic and environmental progress of India. As part of its dedicated approach to create economic opportunity in the communities in which it operates, the Company recognizes the need in contributing its time, expertise and resources to help communities and undertaking a series of initiatives that are locally relevant and help to reinforce a positive & socially responsible image as a corporate entity.

2. APPLICABILITY

This policy has been formulated in accordance with Section 135 of the Companies Act, 2013 and applicable Rules. The Act and the Rules have also laid down the criteria for complying with the provisions relating to CSR, nature of projects, programs and activities that can be undertaken as CSR activities, manner in which the CSR activities shall be undertaken, constitution of CSR Committee, formulation of CSR Policy, annual report on CSR, etc. The Policy shall apply to all CSR projects / programs to be undertaken by the Company in India as per Schedule VII of the Act or any amendments thereto.



3. DEFINITIONS

- a. **"Act"** means the Companies Act, 2013.
- b. **"Board of Directors" or "Board"** means the Board of Directors of the Company..
- c. **"Company"** means Sporta Technologies Private Limited.
- d. **"CSR Committee"** means Corporate Social Responsibility Committee constituted by the Board of Directors of the Company, from time to time, under provisions of the Act.
- e. **"CSR Policy"** means a statement containing the approach and direction given by the Board of a Company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.
- f. **"Rules"** means the Companies (Corporate Social Responsibility Policy) Rules, 2014 and any amendments thereof.

All other expressions unless defined herein shall have the same meaning as have been assigned to them under the Act and rules made thereunder.

4. POLICY OBJECTIVES

The objective of the CSR Policy is to lay down the guiding principles in undertaking various programs and projects by or on behalf of the Company relating to Corporate Social Responsibility ("CSR").



5. ROLE OF THE CSR COMMITTEE

- a. The CSR Committee shall formulate an annual action plan, which shall include the following,
 - the list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - the manner of execution of such projects or programs as specified in the Rules;
 - the modalities of utilization of funds and implementation schedules for the projects or programs;
 - monitoring and reporting mechanism for the projects or programs and
 - details of need and impact assessment, if any, for the projects undertaken by the Company.
- b. It may modify the annual action plan of the Company at any time during the financial year by providing a reasonable justification to that effect subject to the approval of the Board.
- c. Monitor the CSR Policy of the Company from time to time;
- d. It shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- e. In case of ongoing project, it shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period on approval of the Board.
- f. Any other matter/thing as may be considered expedient by the Members of the Committee in furtherance of and to comply with the CSR Policy of the Company on approval of the Board.



6. CSR ACTIVITIES

The Company shall undertake CSR projects related to the list of activities prescribed under Schedule VII of the Act as amended from time to time.

7. IMPLEMENTATION

- a. The mode of implementation of CSR programmes/ projects may include a combination of direct implementation or implementation through entities permitted under the Act and Rules.
- b. The Company will select its partners after conducting appropriate due diligence.

8. CSR OBLIGATION

- a. Company is required to spend, in every financial year, at least such percentage prescribed by the Act from time to time of the average net profits [as calculated under Rules] during the 3 immediately preceding financial years on CSR activities.
- b. Company shall give preference to local areas around where it operates, for spending the amount earmarked for CSR activities.
- c. The Company shall ensure that the administrative overheads shall not exceed the limits prescribed under the provisions of the Act and Rules.



9. MONITORING

- a. The CSR Committee shall meet once in a year or as and when the need arises to review the CSR activities of the Company.
- b. The CSR activities will also be reflected in the annual accounts of Company and will be specified in the Director's report.
- c. The CSR Committee shall meet inter alia to monitor the progress of CSR programmes, CSR spending, and review if any changes are required.
- d. The CSR Committee may communicate its CSR efforts to all its employees and external stakeholders through emails, its own website, and other appropriate dissemination channels.

10. REPORTING

The Board's Report of the Company shall include an Annual Report on CSR outlining the CSR Policy, CSR projects undertaken, the amount available for set off, surplus arising out of CSR Projects, the amount spent and unspent on CSR activities during the financial year on ongoing projects or projects other than ongoing projects and other information as prescribed.

11. GENERAL

In case of any ambiguity or inconsistency between this Policy and the applicable laws, the applicable laws will prevail. In all matters, the interpretation and decision of the Board shall be final.

Any or all provisions of this Policy will be subject to revision / amendment in accordance with the amendments in the Companies Act, 2013 or Companies (Corporate Social Responsibility Policy) Rules and any guidelines on the subject as may be issued from Government from time to time.

The Board reserves the right to amend, modify, cancel, add, or alter any provisions of this Policy.

