

CORPORATE SOCIAL RESPONSIBILITY POLICY

Background and philosophy

Sheth Developers & Realtors (India) Limited seek to contribute to the sustainable development of society by responding to the trust that society places in us and creating new value that exceeds expectations. CSR is a step towards contributing for the development of the society. The Board Of Directors of Sheth Developers & Realtors (India) Limited (the "Board") has decided to adopt its CSR Policy that will comply with the objectives and requirements set in Section 135 of the Companies Act, 2013 (hereinafter referred to as "the Act") and rules notified therein.

Constitution of Corporate Social Responsibility Committee

The Board has formed a Corporate Social Responsibility Committee (the "CSR Committee") in line with Section 135 of the Act.

The CSR Committee will carry out the following functions:

- To formulate and recommend to the Board, a CSR policy indicating activities to be undertaken as specified in Schedule VII of the Act;
- To recommend to the Board the CSR projects/activities to be undertaken by the Company.
- To recommend the amount of expenditure to be incurred on the CSR projects/activities
- To recommend to the Board, modifications to the CSR policy as and when required.
- To monitor the implementation of CSR policy from time to time.

CSR Projects, Programs and Activities

The Company in the initial phase will focus on the following areas for the CSR projects from amongst the activities specified under Schedule VII of the Act and the rules made thereunder:

- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- Ensuring environment sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water;
- Rural Development projects;
- Redevelopment of Housing Societies, Slum re-development, housing for economically weaker sections;
- Promoting education including special education and employment enhancing vocation skills especially children, women elderly and the abled and livelihood enhancement projects.
- Contribution to Prime Minister's National Relief Fund or such other funds as may be recognised under Schedule VII of the Act.

The Company shall identify suitable projects for its CSR activities and specific preference will be given to the projects in the local areas. The Activities undertaken by the Company in pursuance of normal course of business shall not be considered as CSR Activities. The Company will not make any CSR contribution, directly or indirectly, to any political party or to any related party.

CSR Funds

The corpus for the purpose of carrying on the aforesaid activities would include the followings:

- 2% of the average Net Profit made by the Company during immediately preceding three Financial Years.
- Any income arising there from.
- Surplus arising out of CSR activities carried out by the company and such surplus will not be part of business profit of the Company.

Implementation

The Company shall strive to implement the aforesaid CSR activities on its own to the extent possible. At the same time, the Company recognizes the need to work in partnership with other players also and which may include:

- Collaborating with various organisation, which are registered as a Trust or a section 8 company under the Act or Society or NGOs or any other form of entity incorporated in India that specialise in the aforesaid activities.
- Contribution to various funds which are aligned with our Vision and Mission e.g. the Prime Ministers relief fund, etc.
- Collaborating or pooling resources with other companies to undertake aforesaid CSR activities.

Monitoring and Review Mechanism

The CSR Committee will be responsible for monitoring approved projects and fund disbursements for such projects. The CSR Committee will put in place a transparent monitoring and reporting mechanism for ensuring effective implementation of the projects, programs and activities proposed to be undertaken by the Company. Such monitoring mechanisms will include visits, meetings and progress/status reporting by the project teams.

Any or all provisions of this CSR policy may be amended by the Board based on the recommendations of the CSR Committee or in accordance with any statutory guidelines that may be issued from time to time.
