



CORPORATE SOCIAL RESPONSIBILITY



Corporate Social Responsibility Policy

SVF ENTERTAINMENT PRIVATE LIMITED



Introduction

The document describes the Corporate Social Responsibility Policy (“CSR policy”) of SVF Entertainment Private Limited (“SVF” or “the company”). It includes SVF’s vision, mission and other relevant attributes of Corporate Social Responsibility.

We, at SVF believe that our business is built around strong social relevance of inclusive growth by supporting the common man in meeting their financial needs. We equally believe that creation of large societal capital is as important as wealth creation for our shareholders. As a responsible human organization, we are committed towards the above objective and are keen on developing a sustainable business model to ensure and activate our future growth drivers. In line with the regulatory expectations, we are putting in place a formal policy as a guide towards our social commitment going forward.

Vision and Mission

SVF is committed to build a sustainable business with strong social relevance and a commitment to inclusive growth and contribute to the society by supporting causes on various concerns including healthcare, environmental sustainability, promoting education and other rural development activities.

In pursuance of our vision that SVF desires to be a ‘Company which society wants to exist’, we are dedicated towards fulfilling the social objectives through various CSR activities. The Company shall make its endeavour to positively impact and influence the Society for its sustainable development.

Objective

The main objective of SVF’s CSR Policy is

- to lay down guidelines to make CSR a key business process for sustainable development of the society
- to directly/indirectly undertake projects/programs which will enhance the quality of life and economic well-being of the communities in and around our plant and society at large
- to generate goodwill and recognition among all stakeholders of the company

Focus Areas

For purposes of focusing its CSR efforts in a continued and effective manner, the following areas have been identified:

- Promotion of education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- Eradicating hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water;
- 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;
- Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of Art, setting up public libraries, promotion and development of traditional art and handicrafts;
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;
- Measures for the benefit of armed forces veterans, war widows and their dependants;
- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- Contribution to the Prime Minister National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, Scheduled Tribes, other backward classes, minorities and women;
- Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- Rural Development Projects.
- Any other activity as permitted under Schedule VII of the Act.

Composition of CSR Committee

The CSR Committee consists of the following Directors:

- Vishnu Kant Mohta, Chairman
- Mahendra Soni, Member

Governance

The CSR Committee of the Board will govern and review the CSR activities of the Company from time to time.

The CSR Committee will recommend the Annual objectives, budget and general framework for CSR activities to the Board for its approval. The plan will include resource requirements and allocations across the interventions and locations.

Pursuant to Section 135 of the Companies Act 2013, the Board of Directors has already constituted the Corporate Social Responsibility (CSR) Committee.

Responsibility of the Committee

The responsibilities of the CSR Committee include:

- Formulating and recommending to the board of Directors the CSR Policy and indicating activities to be undertaken as specified in Schedule VII of the Companies Act, 2013 and modify / amend the same as required,
- Recommending the amount of expenditure for the CSR activities
- Developing and institutionalizing a CSR reporting mechanism in light with Section 135, Rule 8 of the Companies Act 2013, and
- Monitoring CSR activities from time to time.

Meetings of CSR Committee

The CSR Committee shall meet at least once in six months. The meeting shall be held either at the registered office of the company or any other place, as may be decided by the members.

Physical presence of a minimum of two members of the committee shall constitute the quorum.

Implementation mechanism

The CSR Committee shall:

- a) formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following namely:
 - i. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in schedule VII of the Companies Act;
 - ii. the manner of execution of such projects or programmes, whether by the Company itself, or through an implementing agency as specified in sub-

- rule (1), (3) and (4) of rule 4 of the Companies (Corporate Social Responsibility Policy) Rules, 2014;
- iii. the modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - iv. monitoring and reporting mechanism for the projects or programmes; and
 - v. details of need and impact assessment, if any, for the projects undertaken by the company.

Provided that the Board may alter the annual action plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

- b) monitor the CSR Policy from time to time.

Monitoring of CSR programs

CSR Committee of the Company will be responsible for the monitoring of various CSR projects or programs undertaken by the company directly or indirectly. The committee shall ensure that;

- Company undertakes the CSR activities as provided in the CSR policy
- The projects/ programs are implemented as per the program approved by the board
- The budget allocated for each of the project is utilised for the project as per the approved plans.
- The objective of the program/project is achieved as per the plans.

Budgets and Expenditures

SVF shall allocate a budget towards each of the CSR activities falling within the purview of the objectives of this policy. CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Plan, subject to limit as prescribed under CSR Amendment Rules, 2021. The board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year. Moreover, any surplus arising out of the CSR activities shall not form part of the business profit of a Company and shall be ploughed 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.

The Chief Financial Officer of the Company shall certify that the funds so disbursed have been utilised for the purpose.

The Company, with the approval of the Board, may set off the excess amount incurred against the requirement to spend up to immediate three financial years.

CSR through Trusts & Societies etc.

With the recommendation of CSR Committee and approval of the Board, the Company may undertake CSR Activities through:

- a) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company; or
- b) 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
- c) 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, registered under section 12A and 80G of the Income Tax Act, 1961 and having an established track record of at least three years in undertaking similar activities; or
- e) a company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes.

Excess CSR Expenditure

Where in any year, the Company spends an amount in excess of requirement provided under Section 135(5) of the Act, such excess amount shall be set off against the requirement to spend under Section 135(5) of the Act up to immediate succeeding three financial years' subject to the conditions that the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, and the Board of the company shall pass a resolution to that effect.

Unspent CSR in any Financial Year

If the company fails to spend the CSR amount in any financial year, the Board shall, unless the unspent amount relates to any ongoing project, transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Creation or Acquisition of Capital Asset

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

- a) a company established under section 8 of the Act or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number under sub-rule (2) of rule 4; or
- b) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
- c) a public authority.

Ongoing Projects

The company may undertake multi-year project to fulfil its CSR obligation within three years excluding the financial year in which it is commenced. Such project shall also include activities that were initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification by the CSR Committee.

Disclosure on Website of the Company

SVF shall disclose the composition of CSR Committee, CSR Policy and projects approved by the Board of Directors on its website for public access.

Amendments to the CSR Policy

CSR Policy may be updated to align it with the changing requirement or changes in the legal and regulatory framework. Any revision in the Policy shall be approved by the Board of Directors.

Adopted by the Board of Directors on 30.01.2018 and revised on 13.09.2021