



**Sammaan Capital Limited**

**(Formerly known as Indiabulls Housing Finance Limited)**

## Corporate Social Responsibility

*(Reviewed and Approved by the Board in its meeting held on 24/05/2024)*

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## **1 Introduction and Overview**

### **1.1 Purpose and Objective**

Sammaan group, a well-established and successful corporate conglomerate, has since long been involved in activities of social welfare and betterment as one of the essential tenets of its philosophy towards which four of the flagship companies of its various business segments had as far back as the beginning of the year 2010 established a Public Charitable Trust by the name Indiabulls Foundation. The basic object of the Indiabulls Foundation is contributing and alleviating the pain and sufferings of the poor and needy sections of the country in general while at the same time ensuring that there is a general uplift of the population of the country at large on every front thereby ensuring that those deprived of the opportunities for growth and development, because of their social and financial status, get to participate in equal measure in reaping the benefits of growth and development of the Country.

This Corporate Social Responsibility (CSR) policy of Sammaan Capital Limited (Formerly known as Indiabulls Housing Finance Limited) will ensure an effective and sustained CSR program which will manifest in the form of a progressive, socially responsible and enlightened attitude. CSR activities will be environment friendly and conducive to growth.

### **1.2 Target Audience**

The contents of this policy are applicable in its entirety, to all the personnel of the Company. This policy will be the primary responsibility of the CSR Committee constituted by the Board of Directors of the Company ("Board"). A copy of this policy shall be available on the website of the Company.

### **1.3 Applicability and Validity of the Policy**

This policy will become applicable from such date as approved by the Board of Directors.

The CSR Committee will review, validate, update and the Board of Directors will approve the policy at least annually. Any revision in specific aspects of this policy may be communicated through mandates issued by the relevant authority and will become part of this policy from the date they become effective.

### **1.4 Regulatory and Statutory Reference**

With the promulgation of the Companies Act, 2013 (hereinafter referred to as "Act") on September 2013 and the notification of Section 135 of the Act read with Schedule VII of the Act, dealing with the aspect of corporate social responsibility as also of the Rules laid down to such effect to the Act, which have come into force on the 1<sup>st</sup> day of April, 2014 (the CSR Rules), it has become mandatory for the corporate entities falling within the purview of the limits as to Net worth, Turnover or Profitability as laid down in the said section read with the CSR Rules, to undertake any one or more of the activities as laid

down thereunder, discharge of their responsibility towards the society in general (the "Corporate Social Responsibility" or briefly "CSR").

The Company being a corporate entity falling within the purview of Section 135 of the Act read with CSR Rules, has constituted the CSR Committee and formulated a board approved CSR Policy of the Company.

## **2 Focus Areas for CSR Initiatives**

Corporate Social Responsibility Activities (CSR Activities) shall mean any one or more of the following objectives / purposes, being pursued / undertaken / to be undertaken by the Company, either directly or in collaboration with other companies or through Indiabulls Foundation (a registered trust) or any other registered trust or society or a Company set up for the purpose of undertaking similar programs or projects, within the purview of CSR Rules:

- i. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by Central Government and making available safe drinking water;
- ii. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- iii. 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;
- iv. 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 including contribution to the Clean Ganga Fund set-up by Central Government for rejuvenation of river Ganga;
- v. 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 arts and handicrafts;
- vi. Measure for the benefit of armed force veterans, war widows and their dependents;
- vii. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sports;
- viii. Contribution to the prime minister's 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, the Schedule Tribes, other backward classes, minorities and women;

- ix. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- x. Rural Development projects;
- xi. Slum area development
- xii. Any other activity, as may be notified by the Central Government from time to time.

### **3 CSR Contribution and CSR Spend**

The contribution by the Company in every financial year towards CSR Activities / programs / projects shall be a minimum of 2% of its average Net Profits for three immediately preceding financial years.

CSR spend shall be governed by the following principles:

- i. It is hereby explicitly stated that any surplus arising out of the CSR Activities shall not form a part of the business profits of the Company.
- ii. The CSR expenditure that remains unspent / unutilised for the particular year shall be carried forward to the next year.
- iii. CSR programs / projects / activities meant exclusively for employees and their families will not qualify under CSR spent.
- iv. Contribution of any amount directly or indirectly to any politically party shall not be considered as CSR program / project / activity.
- v. CSR Expenditure shall not include any expenditure on any program or project or activities which is not in conformity with the Company's CSR Policy and the activities include activities, areas or subjects specified in Schedule VII of the Act.

### **4 Composition of the CSR Committee**

The Company has a duly constituted CSR Committee comprising of three directors, two directors being Non-Executive Independent Directors and one being an Executive Director. The Chairman of the Committee is a Non-Executive Independent Director.

The Company Secretary acts as the Secretary to the CSR Committee.

## 5 Functioning of the CSR Committee

The CSR Committee formed towards effectuation and implementation of the CSR Activities shall identify and recommend the specific CSR activity (ies) to the Board of Directors of the Company for its consideration and approval. Based on the Board's approval the required funds shall be infused into approved CSR activities. The same shall constitute the CSR Contribution of the Company for the relevant financial year.

The Committee shall institute a transparent monitoring mechanism for implementation of the CSR activities such as:

- i. CSR Committee shall meet up at regular intervals to discuss, review and monitor the CSR activities of the Company.
- ii. CSR Committee shall obtain and review the relevant progress reports and impact of various CSR programs / projects / activities implemented and to identify gaps / slippages therein and to plan corrective measures as may be required for the purpose.
- iii. CSR Committee shall ensure that the projects / programs / activities that are undertaken by the Company are in compliance with various applicable laws / regulations of the areas as identified for CSR expenditure.
- iv. CSR Committee shall ensure that appropriate documentation of all the programs / projects / activities, statements of the budget & expenditure are being undertaken on regular basis.
- v. CSR Committee shall submit progress updates on CSR activities undertaken to the Board of Directors, from time to time.

## 6 Overall Improvement in Functioning and Discharge of CSR

The Committee shall from time to time explore the ways and means whereby improvements that need to be brought about towards the discharge of CSR by the Company are identified and steps taken to ensure that measures necessary to effectuate the areas of improvement so identified are taken in the right earnest.

## 7 Abbreviations

Abbreviations	Details
CSR	Corporate Social Responsibility