



SYMPHONY
RETAIL



CORPORATE SOCIAL RESPONSIBILITY POLICY

Human Resources

01/01/2021

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1. Purpose

Organizations are economic structures of society, it is our belief that an organization's performance must be measured by its contribution towards building economic, social and environmental capital which enhances societal sustainability.

Our focus has always been to contribute towards sustainable development of the society and environment in order to make India a sustainable place for future generations. These initiatives are independent of the normal conduct of our business. All programs, projects and activities (collectively "CSR Programs") carried out in this regard are the subject matter of this Policy.

This Policy shall be read in line with Section 135 of the Companies Act 2013, Companies (Corporate Social Responsibility Policy) Rules, 2014 and such other rules, regulations, circulars, and notifications (collectively referred hereinafter as "Regulations") as may be applicable and as amended from time to time and will, inter-alia, provide for the following:

- i. Establishing a guideline for compliance with the provisions of Regulations to dedicate a percentage of Company's profits for social projects;
- ii. Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting;
- iii. Creating opportunities for employees to participate in socially responsible initiatives;
- iv. To direct our CSR Programs, inter alia, towards achieving one or more of the following - enhancing environmental and natural capital; supporting rural development; promoting education; providing preventive healthcare, providing sanitation and drinking water; creating livelihoods for people, especially those from disadvantaged sections of society, in rural and urban India; preserving and promoting sports;
- v. To develop the required capability and self-reliance of beneficiaries at the grass roots, in the belief that these are prerequisites for social and economic development;
- vi. To engage in affirmative action interventions such as skill building and vocational training, to enhance employability and generate livelihoods for persons from disadvantaged sections of society;
- vii. To pursue CSR programs primarily in areas that fall within the economic vicinity of the Company's operations to enable close supervision and ensure maximum development impact;
- viii. To carry out CSR Programs in relevant local areas;
- ix. To promote sustainability in partnership with industry associations for Sustainable Development, in order to have a multiplier impact.



2. Definitions

In this Policy unless the context otherwise requires:

- i. "Act" means the Companies Act, 2013;
- ii. "Annexure" means the Annexure appended to these rules;
- iii. "Corporate Social Responsibility (CSR)" means and includes but is not limited to
 - a. Projects or programs relating to activities specified in Schedule VII to the Act or
 - b. Projects or programs relating to activities undertaken by the board of directors of a company (Board) in pursuance of recommendations of the CSR Committee of the Board as Per declared CSR Policy of the company subject to the condition that such policy will cover subjects enumerated in Schedule VII of the Act.
- iv. "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act
- v. "CSR Policy" relates to the activities to be undertaken by the company as specified in Schedule VII to the Act and the expenditure thereon, excluding activities undertaken in pursuance of normal course of business of a company.
- vi. "Net profit" means the net profit of a company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:
 - a. Any profit arising from any overseas branch or branches of the company' whether operated as a separate company or otherwise;
 - b. Any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act:
- vii. Provided that net profit in respect of a financial year for which the relevant financial
- viii. Words and expressions used and not defined in these rules but defined in the Act shall have the same meanings respectively assigned to them in the Act.

3. CSR Activities

We contribute & provide opportunities for employees to participate in CSR initiatives identified by employees and approved by the CSR committee that measurably improve the lives of underprivileged by one or more of the following focus areas as notified under Section 135 of the Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014 and further amendments from time to time:

2019-22 Key Focus Areas:

- ✓ Uplifting of differently abled individuals in ANTHARAGANGA VIDYA SAMSTHE, Kolar, Karnataka
 - Special arrangements for differently abled kids for their mobility and independent



- functioning in day to day activities
- Provide sustainable power back-up and streetlights to the school campus to avoid entry of wild animals
- Support with hygienic kitchen environment and basic food essentials
- Digital literacy – Internet access for education

The above list is illustrative not exhaustive. All activities under the CSR activities are environment friendly and socially acceptable to the local people and Society.

4. Allocation of Funds

We will spend not less than 2% of the average Net Profits of the Company made during the three immediately preceding financial years. The surplus arising out of the CSR activity will not be part of business profits of the Company. The Corpus would thus include the 2% of average net profits, as aforesaid, any income arising there from and surplus arising out of CSR activities.

5. Corporate Social Responsibility (CSR) Committee

CSR Committee comprises of 2 board of members who are mentioned below,

1. Chandramouli Vaidyanathan (Chairman)
2. Rahul Bhattacharya

Board of Directors shall be responsible to

- Take decision for making or effecting changes in the constitution of the CSR Committee;
- Approve the CSR Policy & disclose the composition of CSR Committee in its Board of Directors' report and place it on the Company's website;
- Ensure that the activities proposed in the CSR Policy are undertaken by the CSR committee;
- Ensure that the Company spends, in every financial year, at least 2% of average net profits of the Company made during the 3 immediately preceding financial years, as required under Section 135 of the Companies Act, 2013 & Rules made thereunder;
- If Company fails to spend the sum as mentioned above, then the board shall, in its report specify the reasons for not spending the amount.

CSR Committee shall be responsible to

- To formulate & recommend to the Board of Directors, a CSR Policy indicating the activities to be undertaken as specified in Schedule VII of the Companies Act, 2013 and modify / amend the same as required to make sure implementation is done in a transparent manner and monitored accordingly;



- To review and approve annual budgets with respect to CSR programs in consultation with the Board of Directors;
- To develop and institutionalize a CSR reporting mechanism in light with Section 135, Rule 8 of the Companies Act 2013;
- To ensure that the corporate website displays the approved CSR policy of the Company;
- To monitor the CSR Policy, Projects and Programs from time to time.
- Plan CSR Committee meetings 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.

6. Policy Exclusions

- Activities which are exclusively for the benefit of employees of the Company or their family members;
- Activities undertaken in pursuance of normal course of business of the Company;
- Direct or indirect contribution to political parties;
- Expenditure on item/s not in conformity with Schedule VII of the Companies Act 2013;
- Surplus arising out of CSR projects shall not form part of the business profits of Company instead the same will be further used for CSR purposes only.

7. Geographies and beneficiaries

Our CSR programs focuses on supporting children / students, women, weaker sections of the society and others – society at large across the state of Karnataka & extended to other areas in India.

4. Questions

Any queries in relation to the content of this policy should be directed to Board of Directors.

