

STERLING ADDLIFE INDIA PRIVATE LIMITED

Reg. Office: Sterling Hospital, Sterling Hospital Road, Memnagar, Ahmedabad-380052

CIN# U85110GJ2000PTC039121

DRAFT REVISED CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Introduction

The Board of Directors (the "Board") of Sterling Addlife India Private Ltd. (the "Company") has adopted the following policy and procedures with regard to Corporate Social Responsibility. The Board may review and amend this policy from time to time subject to the recommendations of Corporate Social Responsibility Committee.

2. Background

The Company's Corporate Social Responsibility (CSR) policy is framed In accordance with the notification issued by the Ministry of Corporate Affairs' dated 27th February 2014 under Section 135 of the Companies Act 2013 ("the Act").

3. CSR Vision

The Company's CSR vision is governed by trust, fairness and care and shall be based the below keystones:

- To actively initiate projects and/ or participate in projects to improve the imparting knowledge and education to the school going Students from all walks of Society.
- To actively initiate projects and/ or participate in projects to improve the life of people.
- Company will strive to provide vocational training to improve skills of people in the primarily unorganised sector.
- To carry out CSR activities as specified in Schedule VII of the Act, with emphasise in the areas of :
 - Women, Children and other disadvantaged person's Welfare.
 - To provide encouragement and support to various selfless workers and institutions helping them.
 - Environmental preservation
- Company shall manage its operations using principles of Sustainable development to minimize impact on environment and protect health & safety of all stakeholders.

4. CSR Committee and its Role

CSR committee of the Company comprises of three members. The present composition of the CSR committee consists of the following members of the Board.

Sr. No.	Name of Director	Designation
1	Mr. Amol Jain	Chairman
2	Mr. Jonathan Tatur	Director

Mr. Amol Jain is the Chairman of the CSR Committee. Both the members of CSR committee have rich and varied experience and are directly or indirectly involved in the CSR activities at different levels.

CSR committee formed by the Company shall work in co-ordination and in accordance with directions given by the Board from time to time.

Role of CSR Committee shall include *inter-alia* the following:

- Recommend, formulate and implement CSR activities approved by the Board and in compliance with Schedule VII of the Act.
- Specify projects and programmes that are to be undertaken, list out the programmes which Company plans to undertake during any financial year and specify the modalities of execution of CSR activities.
- Monitor and recommend the amount of CSR Expenditure to be incurred for CSR activities and to ensure it is in line with the CSR Policy.
- To monitor CSR Policy of Company from time to time.
- Any other activity as may be advised by the Board or as may be required by governing law or statute.
- The CSR Committee shall formulate and recommend to the Board for its approval, Annual CSR Action Plan. During the financial year, the Annual CSR Action Plan may be revised/modified/amended by the Board, as per the recommendation of the CSR Committee, based on reasonable justification to that effect. The Annual CSR Action Plan for concerned financial year shall be given as per format prescribed in Annexure- 1 enclosed with this Policy.

5. Implementation

The Company proposes to implement CSR Programs through Company personnel, contribution to any trust/fund/association focusing on CSR activities or through external implementing agencies. The Company will specify the CSR Programs which may be undertaken by those agencies in accordance with CSR policy of the Company and governing laws from time to time.

6. Monitoring/Review Mechanism

The monitoring and review mechanism shall be followed for the CSR initiatives, which shall ensure a top down review and delivery.

Regular review of amount spent on each activity and achievements against milestones and objectives by the CSR Committee to ensure a transparent monitoring process.

The Management shall in consultation and through the supervision of the CSR Committee consider projects with detailed programmes to be undertaken, proposed amount, timeline and a confirmation that such projects are eligible under the Companies Act, 2013 and the rules made there under from time to time.

The Company will ensure that every program has :

- Clearly defined objectives
- Detailed progress monitoring system
- Impact assessment

The CSR Committee shall be responsible for overseeing the planning, coordination and implementation of CSR activities and compliance of the same shall be reported to board and the same shall be reported to stakeholders through the Company's Annual Report.

7. CSR Expenditure

CSR expenditure will include all expenditure as may be permitted under the applicable laws; including contribution to corpus for CSR Programs approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities as permitted under Schedule VII of the Act.

8. Reporting

The Board's Report of the Company shall include an annual report on CSR containing particulars specified in the annexure to the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

9. Disclosures

The contents of the approved CSR Policy and any amendment thereto shall be disclosed in the Board's Report and displayed on the Company's website. The Board shall ensure that the Composition of CSR Committee, CSR Policy and Annual CSR Action Plan for respective financial year is displayed on the Company's website.

10. Amendments to the Policy

Any statutory amendment relating to CSR shall become automatically applicable to this policy from the date it is notified. The Company is committed to continuously reviewing and updating policies and procedures related to CSR so that they are in conformity as legislative changes & amendments in Companies Act, 2013 from time to time.

**FOR AND ON BEHALF OF BOARD OF DIRECTORS
STERLING ADDLIFE INDIA PRIVATE LIMITED**

**AMOL JAIN
CHAIRMAN CSR COMMITTEE
DIN:0334710**

ANNEXURE-1

ANNUAL CSR ACTION PLAN FOR THE FY _____

Sr. No.	Name of CSR Project or Programme	Manner of Execution	Modalities of utilization of funds and implementation schedules	Monitoring and Reporting Mechanism	Details of need and impact assessment, if any.
1					
2					
3					
4					
5					