

STAR AGRIWAREHOUSING AND COLLATERAL MANAGEMENT LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY
CSR/02/07/22

TITLE AND APPLICABILITY

Star Agriwarehousing and Collateral Management Limited (hereby referred to as 'Staragri' or 'The Company') Corporate Social Responsibility (CSR) Policy has been developed in accordance with section 135 of the Companies Act 2013 ("Act") on CSR and in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("Rules") (including any statutory modifications, amendments, or re-enactments of any of them for the time being in force). This Policy shall apply to all CSR projects/ programmes undertaken by Company as per Schedule VII of the Act.

VISION

Corporate Social Responsibility (CSR) is the way and mean through which corporates can repay the obligations made by the Society by contributing the resources in its various forms as required for the efficient operation of the Business. Corporate Social Responsibility is strongly connected with the principles of sustainability. Organization should make decisions based not only on financial or operational factors, but also on the social and environmental consequences. Therefore, it is the core corporate responsibility of Staragri to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

OBJECTIVES

The Company's CSR objectives:

- Having minimal impact on the natural environment and enabling local communities to develop their potential.
- Empowering employees to be responsible civil society members and committing ourselves to ethical business practices that are fair to all stakeholders.
- Strive for economic development that positively impacts the society at large with minimal resource footprint.
- Embrace responsibility for the Company's actions and encourage a positive impact through its activities on hunger, poverty, malnutrition, environment, communities, stakeholders and the society.

FOCUS AREAS

In accordance with the requirements under the Companies Act, 2013, Company CSR activities, amongst others, will focus on:

1. Education: Inclusive and equitable quality education for different age groups and promote lifelong learning opportunities for all.
2. Eradicating hunger, poverty and malnutrition: Support poverty and malnutrition projects, promote healthcare including preventive healthcare and sanitation and safe drinking water.

3. Environmental sustainability: Water conservation, clean and renewable energy, adoption of wastelands to cultivate plants, environmental sustainability, ecological balance, conservation of natural resources and reduction of pollution, protection of flora & fauna, promoting biodiversity, animal welfare and veterinary services, promoting alternate energy resources, reviving endangered plants, promoting agro-forestry, maintaining quality of soil, air & water, technical support and knowhow for improving farming and building capacities of small farmers.
4. Relief funds: Contribute to government relief funds or any other fund for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women, disaster relief and rehabilitation and any calamities as approved by the Government.
5. Rural development: Integrated rural development to improve education, health, livelihoods, and environmental conditions in rural and marginalised geographies.
6. Research & technology: Support to research institutions and technology incubators in Central Government approved academic and research institutions.
7. Gender equality: Support empowerment programmes for girl children, adolescent girls, and women, through education, health and livelihood projects, setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens.
8. National heritage: Protection of national heritage, art and culture and restoration of Buildings & sites of historical importance & works of art.
9. Sports: Promote sports in all forms, geographies and for all groups including (but not limited to) sports for persons with disabilities.
10. Armed forces welfare: support armed forces veterans, war widows and their dependents
11. Slum area development.
12. Other Activities:
 - Welfare for differently disabled persons
 - Setting up public libraries
 - promotion and development of traditional art and handicrafts;
 - Reducing inequalities faced by the socially and economically backward groups
 - Disaster management, including relief, rehabilitation and reconstruction activities.
 - Such other activities as may be notified by the relevant Authority under Schedule VII of the Companies Act, 2013.
13. Incidental Activities.

- Employing people and incurring other costs to carry out aforesaid activities.
- Such other activities as the Board may consider being appropriate.

CSR IMPLEMENTATION

The Company's CSR Programmes will be implemented through:

- (i) the Company itself and / or its personnel, or
- (ii) (ii) external implementing agencies, or
- (iii) (iii) such other trusts, societies, foundations and Section 8 companies that qualify as per the Act. All external implementing agencies / organisations should have registered themselves with the Central Government by filing the Form CSR-1 and shall have obtained unique CSR Registration number.

GOVERNANCE STRUCTURE

The Board of Directors of the Company has formed a Corporate Social Responsibility (CSR) Committee in accordance with the Act and CSR Rules which shall govern the Company's CSR and provided necessary updates / recommendations to the Board from time to time.

The CSR Committee will review, monitor and provide strategic direction to the Company's CSR and industry practices towards fulfilling its ESG obligations. The CSR Committee will also guide the Company in formulating paradigms for sustained changes in the areas.

The CSR Committee will recommend an Annual Action Plan in pursuance of the CSR Policy covering list of CSR projects or programmes, manner of execution of CSR projects or programmes, expenditure to be incurred on CSR, modalities of utilisation of fund and implementation schedules for the projects or programmes, monitoring and reporting mechanism for the projects or programmes and details of need and impact assessment, if any for the projects or programmes and identify the time frames to such persons or bodies as it may deem fit, and ensure implementation thereof as per the requirements of the Act and CSR Rules.

The implementing agencies will provide a report to the CSR Committee on the progress of the CSR Programmes, annually or at such other frequency as directed by the CSR Committee and in the format as specified by the CSR Committee. The CSR Committee will review the report provided by the implementing agencies and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Programmes in accordance with this Policy.

The Board of Directors of the Company will ensure that the CSR activities undertaken by the Company are in accordance with the CSR Policy, Act and CSR Rules. At the end of every financial year, the Company will disclose a report on the CSR activities as part of the Report of the Board of Directors (hereinafter referred to as the 'Board's Report').

CSR EXPENDITURE

The Board of Directors of the Company shall ensure that the Company spends, in every financial year, at least two per

cent of its average net profits made during the three immediately preceding financial years (or such other limit as may be prescribed under the Act), on CSR Programmes in pursuance of this Policy. The CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on the CSR Programmes undertaken in accordance with the CSR Plan.

Any surplus arising from the CSR activities shall not form part of the business profit and shall be ploughed back into same project or shall be transferred to unspent CSR account in accordance with the Act and CSR Rules.

If the Company fails to spend such amount, the Board shall ensure that the unspent amount (unless relating to on-going project) shall be transferred to the specified fund in accordance with the Act and CSR Rules. If CSR expenditure in a financial year exceeds the statutory limit, such excess may be set-off against CSR expenditure for the next three financial years in accordance with the Act and CSR Rules. The unspent amount relating to the on-going project shall be transferred to a special account in accordance with the Act and CSR Rules.

In case of any change in the CSR provisions under the Act and / or the CSR Rules or notified through any separate notification or circular or clarification or guidance note, implementation of this CSR Policy and incurring of the CSR expenditure may be made based on the amended provisions even if the same is / are contrary to this CSR Policy and without immediate need to amend the same.

EFFECTIVE DATE

The original policy was adopted earlier by the Board of Directors of the Company and the same was amended with effect from 22nd July 2021.

AMENDMENTS

The Board of Directors, either on its own or as per the recommendations of CSR Committee, can amend this Policy, as and when required. The decision of the Board of Directors on all matters, relating to this Policy, shall be final and binding upon all concerned. This Policy is subject to continuous review and updates as required from time to time. In the event of any inconsistency between this Policy and the applicable laws, the applicable laws will prevail.

WEBSITE DISCLOSURE

The composition of CSR Committee and CSR Policy will be displayed on the company's website (www.staragri.com).

POLICY HISTORY DETAILS

| Sr. No. | Date of Board approval | Particulars | Effective Date |
|----------------|-------------------------------|--|-----------------------|
| 1. | 27-09-2014 | Approval of CSR Policy in terms of Section 135 of the Companies Act, 2013 read with Rules framed thereunder | 27-09-2014 |
| 2. | 22-07-2021 | Amendment in CSR Policy to bring it in conformity with Section 135 of the Companies Act, 2013 and the CSR Rules as amended vide MCA circular dated 22nd January 2021 | 22-07-2021 |

STAR AGRIWAREHOUSING AND COLLATERAL MANAGEMENT LIMITED
COMPOSITION OF CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

Pursuant to the provisions of the Act, the Company has duly constituted the CSR Committee. The composition of the CSR Committee is given below:

| Sr. No. | Name of Directors | Designation / Nature of Directorship |
|---------|----------------------|--------------------------------------|
| 1 | Mr. Amith Agarwal | Chairman -Executive Director |
| 2 | Mr. G Chandrashekhar | Independent Director |
| 3 | Mr. Amit Goyal | Non-Executive Director |