

SHV ENERGY PRIVATE LIMITED
Corporate Social Responsibility Policy

Introduction

The Board of SHV Energy Private Limited ("the Company") has approved this CSR Policy, formulated by the CSR Committee in accordance with the provisions of Section 135 of the Companies Act, 2013 ("Act"), read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("CSR Rules") and Schedule VII of the Act (as amended from time to time). This policy aligns with the Company's objectives, principles, and values, outlining its commitment to being a socially and environmentally responsible corporate citizen.

Objective and Scope

The Company draws its inspiration from SHV's worldwide CSR concept of "Start from the Heart", working towards the empowerment of the needy communities and underprivileged children so that they can help themselves and grow up as responsible citizens. With this principle at its core, the Company actively collaborates with local communities to improve the quality of life for disadvantaged and underprivileged individuals in and around its operational areas in India. To fulfil this commitment, the Company establishes clear guidelines and approaches through this CSR Policy for implementing social welfare activities aimed at enhancing societal well-being.

CSR Implementation

CSR initiatives shall be implemented in a project mode with clearly defined objectives and resource allocation. During the execution of CSR activities, the CSR Committee ensures the active involvement of the community and beneficiaries at every stage, from planning and implementation to monitoring. This participatory approach will help align the initiatives with the actual needs of the community and ensure sustainable impact.

The Company shall undertake all its CSR activities through SUPERGAS Foundation (Implementing Agency), which implements them in alignment with this policy and the provisions outlined in Section 135 read with Schedule VII of the Act and CSR Rules. However, the Company may also undertake certain CSR activities directly in accordance with this CSR policy and the Act read with CSR Rules.

SUPERGAS Foundation is a registered non-profit charitable trust established in 2011 as the philanthropic arm of the Company, for promoting education among poor and underprivileged children in India and for the purpose of serving the community in India as a part of its corporate social responsibility, in line with its chosen initiatives as per schedule VII of CSR rules. The Unique Registration Number of SUPERGAS Foundation provided by the Ministry of Corporate Affairs is CSR00014967.

CSR Focus Areas

While the Company may undertake CSR activities in any areas mentioned in the Schedule VII of the Act, the focus areas of CSR activities shall be on the following areas:

- a) Promoting education among poor and underprivileged children.
- b) Setting up homes and hostels for women, orphans, and senior citizens.

- c) Empowering women and promoting gender equality.
- d) Eradicating hunger and malnutrition.
- e) Promoting preventive health care.
- f) Rural Transformation.
- g) Environment protection.

The above list is illustrative and not exhaustive. The CSR Committee may identify areas beyond those stated above, in line with Schedule VII of the Act, and recommend them to the Board of Directors in the Annual Action Plan for a particular year to undertake CSR activities.

Corporate Social Responsibility Committee

Pursuant to the provisions of Section 135 of the Act and the CSR Rules, the Board of Directors shall constitute the Corporate Social Responsibility Committee (“CSR Committee”). The members of the CSR Committee shall be appointed by the Board of Directors of the Company and must include at least two Directors.

The CSR Committee shall meet at least once a year. Members of the CSR Committee can mutually agree on the mode, time, and place for these meetings. The quorum for each meeting should be at least two members. Members may participate in meetings either in person or through video conferencing or other audio-visual means, in accordance with the provisions of the Act and the CSR Rules. Minutes of the CSR Committee shall be placed before the Board for noting.

Powers, Roles & Responsibilities of the CSR Committee

- a) Formulate and recommend to the Board a CSR Policy, including any amendments.
- b) Formulate and recommend to the Board a CSR Annual Action Plan, including any amendments.
- c) Ensure the effective implementation of the CSR Policy and CSR Annual Action Plan approved by the Board.
- d) Monitor the CSR Policy and CSR Annual Action Plan as approved by the Board from time to time.
- e) Recommend CSR Budget to the Board and ensure the spending of allocated funds.
- f) Ensure the unspent amount (if any) is spent in accordance with the Act and the CSR Rules.
- g) Create a transparent monitoring mechanism for implementation of CSR initiatives.
- h) Authorize SUPERGAS Foundation to undertake CSR activities on behalf of the Company.
- i) Approve the Annual CSR Report as required under the Act and CSR Rules.
- j) Authorize any person from the Company and SUPERGAS Foundation to attend the CSR Committee meetings.
- k) Determine the funding for each CSR project or activity based on its feasibility and practicality, ensuring alignment with the overall CSR budget.
- l) Power to authorise the Chief Executive Officer of the Company in the CSR Annual Action Plan to take necessary actions and perform such acts, deeds, and things as may be required to ensure compliance with Section 135 of the Act and CSR Rules.
- m) Perform any other acts, deeds, and things the CSR Committee deems fit in the best interest of the Company, in accordance with the Act and the CSR Rules.

CSR Spending

The Company shall endeavour to achieve the objectives of CSR Policy and allocate a minimum of 2% of its average net profits made during the three immediately preceding financial years to CSR activities each year. Any income or surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the company and the same shall be ploughed back for use in CSR activities.

The Company will allocate funds to SUPERGAS Foundation as per the requirements for the projects. SUPERGAS Foundation will then utilize these funds to make payments to NGOs, Schools, Educational Institutions, respective vendors, contractors, or service providers as per their agreements and the norms outlined in the MOU/Quotation provided by them for project implementation.

The funding for each project or activity will be determined based on the feasibility and practicality of the activity being undertaken. While allocating funds for CSR activities, preference shall be given to the local area and its surrounding regions where the Company operates. However, activities may be undertaken on a PAN India basis based on requests received.

The CFO shall monitor the utilization of funds for the purposes set forth and certify to this effect. Any Unspent CSR amount (if any) shall be dealt with in accordance with the provisions of the Act and CSR Rules.

Monitoring of CSR Activities and reporting mechanism

The CSR Committee shall monitor the implementation of the CSR projects or programmes in accordance with the Company's CSR policy and the provisions outlined in Section 135 read with Schedule VII of the Act and the CSR Rules.

SUPERGAS Foundation shall submit a Report to the Company on the CSR activities undertaken which shall include the description of CSR activities and other relevant details.

The Board shall satisfy that the funds disbursed for CSR have been utilized for the purpose and in the manner as approved by it and Chief Financial Officer will certify the same as per the provisions of the Act and CSR Rules.

Annual Action Plan

The CSR Committee shall formulate and recommend to the Board, an Annual Action Plan which shall include the following:

- a) List of CSR projects or programmes approved to be undertaken.
- b) Manner of execution of such projects or programmes as specified in rule 4(1) of CSR Rules.
- c) Modalities of utilisation of funds and implementation schedules for the projects or programmes.
- d) Monitoring and reporting mechanism for the projects or programmes.
- e) Details of need and impact assessment, if any, for the projects undertaken by the Company.

The Board may alter 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.

Information dissemination

In terms of the Act and CSR Rules, following details should be displayed on the website of the Company:

- a) Composition of the CSR Committee.
- b) CSR Policy.
- c) Projects approved by the Board.

Further, as per the CSR Rules, the contents of the CSR Policy shall also be included in the Board's Report.

Limitation, Review and Amendment

This CSR Policy is recommended by the CSR committee and approved by the Board of Directors in their respective meetings. In the event of any conflict between the provisions of this Policy and of the Act and the CSR Rules, the provisions of Act and the CSR Rules shall prevail over this Policy. Any subsequent amendment / modification to the Act and the CSR Rules shall automatically apply to this Policy. The CSR Committee may review this Policy periodically and recommend amendments for the Board's approval from time to time, as may be deemed necessary.