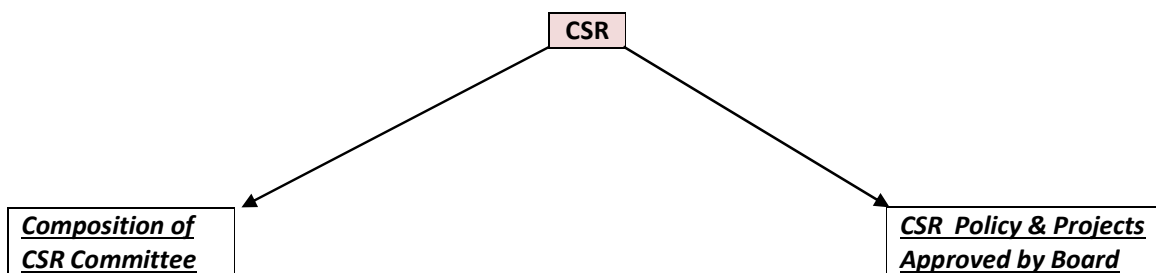


Disclosure under Rule 9 of Corporate Social Responsibility Rules, 2014 to display of following CSR details on website of company, if company having a website

***Note: Website Disclosure is mandatory if company having a website, otherwise it's not applicable**



Composition of CSR Committee:

The CSR Committee of the company comprises 2 (Two) member, the composition of committee as follows-

- a) Sh. Mohan Goel–Chairman of the CSR Committee
- b) Sh. Krishna Goyal–Member of CSR Committee

CSR Policy & Projects Approved by Board:

Our Company believes in helping hands. And over the years we have embarked on the journey of social change through inclusive growth dedicated to the cause of our future and future generations. With children at the core, our CSR efforts revolves around, eight strong pillars of Health & Nutrition, Education, Skill Development, Sanitation, Healthcare, Environment, Heritage Conservation and other Humanitarian Causes. These pillars not only move hand in hand with the ones envisioned by the government but are also a part of United Nations Sustainable Development Goals. Most of our CSR activities revolve around improving the lives and livelihood of communities where we operate.

The Corporate Social Responsibility Policy approved by the Board on 18.04.2020.

PREAMBLE

SHEEL OIL & FATS PRIVATE LIMITED is a private limited company by eminent people and registered in the year 2009, since then the promoters are constantly working relentlessly to reach the goals of the company and achieved the same with a great success.

As per the provisions of Section 135 of the Companies Act, 2013, read with rules framed there under, every company including its holding or subsidiary and a foreign company, which fulfills the criteria specified in sub-section (1) of section 135 of the Act shall comply with the provisions of Section 135 of the Act and its rules and our Company is falling under any criteria specified in sub-section (1) of section 135 of the Act.

The Board of Directors of company acknowledged that by integrating Social environment and ethical responsibilities into the governance of business would ensure the long term success and sustainability of the Projects undertaken under CSR. The Company believes that decisions should not only be based on financial considerations, but also keeping in mind the affect of such decision on the social environment. The Company will thus puts to Practice Policies keeping social responsibility at the core. The Company as a good corporate citizen has corporate social responsibility as part of its culture in its pursuit of goals.

GUIDING PRINCIPLES

The Company recognizes and is always committed towards sustainable development and inclusive growth. We strive to ensure strong corporate culture which emphasizes on integrating CSR values with business objectives. We also pursue initiatives related to quality management, environment preservation and social awareness.

SCOPE OF CSR POLICY

The policy pertains to all activities undertaken by the Company towards fulfilling its corporate social responsibility objectives. The policy also ensures compliance with section 135 of the Companies Act, 2013, Schedule VII of the Companies Act, 2013 and the rules made thereunder.

OBJECTIVES OF THE POLICY/ CSR VISION

This Policy shall be 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/notified from time to time and will, inter-alia, provide for the following:

- Establishing a guideline for compliance with the provisions of the Regulations to dedicate a percentage of Company's profits for CSR activities.
- Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.
- Creating opportunities for employees to participate in socially responsible initiatives.

CSR Projects/Activities

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged by one or more of the following focus areas as notified under Schedule VII of Section 135 of the Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014:

The Board of Director of the company approved following projects or programs for CSR Expenditures:

- a. Eradicating hunger, poverty and malnutrition, promoting health care including preventinve health care and sanitation including contribution to the Swach

- Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- b. Promoting education, including special education & employment enhancing vocation skills especially among children, women, elderly & the differently-abled & livelihood enhancement projects;
 - c. Promoting gender equality, empowering women, setting up homes & hostels for women & orphans, setting up old age homes, day care centers & such other facilities for senior citizens & measures for reducing inequalities faced by socially & economically backward groups;
 - d. Ensuring environmental sustainability, ecological balance, protection of flora & fauna, animal welfare, agro-forestry, conservation of natural resources & maintaining quality of soil, air & water including contribution to the Clean Ganga fund set up by the central government for rejuvenation of river ganga.
 - e. Protection of national heritage, art & culture including restoration of buildings & sites of historical importance & works of art; setting up public libraries; promotion & development of traditional arts & handicrafts;
 - f. Measures for the benefit of armed forces veterans, war widows & their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
 - g. Training to promote rural sports, nationally recognised sports, Paralympic sports & Olympic sports;
 - h. Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development & relief & welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities & women;
 - i. (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
 - j. (b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council

of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);

- k. Rural development projects
- l. Slum area Developments
- m. disaster management, including relief, rehabilitation and reconstruction activities

Our Company Undertakes CSR activities as projects, programs or activities (either new or ongoing) as per schedule VII of Companies Act, 2013 excluding activities undertaken in pursuance of the normal course of business of the Company.

THE GEOGRAPHICAL REACH

In the Spirit of the Provisions of the Companies Act, Preference is being given to the local area and the Surrounding Areas, for spending the amount earmarked for Corporate Social Responsibility. However, the Committee may identify such areas other than stated above, and make recommendation to the Board for consideration.

CSR COMMITTEE & ITS MEETINGS

CSR Committee

In compliance with the provisions of section 135 of the Act, a CSR Committee has been constituted by the Board. CSR Committee at all times share comprises a minimum of 2 directors. Constitution of the CSR Committee can be changed by the Board from time to time.

Frequency of Meetings – the Committee will meet as and when required.

Invitees - CSR Committee may at its discretion invite Associates/others, to attend and participate at the meeting.

Resolutions

All decisions shall be taken by simple majority. In case of equality of votes on any matter, Chairman shall have a casting vote. The CSR Committee can also pass the resolution by circulation.

Minutes

Minutes of the proceedings and resolutions of the CSR Committee meetings shall be signed and confirmed by the Chairman of the meeting. Minutes so signed and confirmed shall be conclusive evidence of such proceedings and resolutions. Minutes of all Committee meetings will be open for inspection at any reasonable time on reasonable notice by any member of the Board of Directors of the Company.

Committee Members

S. No.	Names of the Members	Chairman / Member
1.	Mr. Mohan Goel	Chairman
2.	Mr. Krishna Goyal	Member

The members are liable to change as per decision of the Board of Directors.

BUDGET

Budget for expenditure to be incurred on the focused activities to be covered, to achieve the aforesaid goal, would be decided by the CSR Committee from time to time.

IDENTIFICATION OF PROJECTS

1. While all the CSR programs are focused in India, the company shall give preference to the local areas near its registered office and its Corporate Office.
2. The projects or programs shall not be undertaken in pursuance and part of the normal course of business.
3. The activities shall not include activities exclusively for the benefit of its employees and their family members and shall rather be for the benefit of public at large.

CSR THROUGH REGISTERED TRUST, SOCIETY, OTHERWISE

The Board of Directors of the Company may decide to undertake CSR activities approved by the CSR Committee, through a registered trust or a registered society or a company established by the Company or its holding or subsidiary or associate company under section 8 of the Companies Act 2013 or otherwise. Provide that:

- ☐ If such trust, society or company is not established by the Company or its holding or subsidiary or associate company, it shall have an established track record of 3 (three) years in undertaking similar programs or projects;
- ☐ the Company has specified the project or programs to be undertaken through these entities, the modalities of utilization of funds on such projects and programs and the monitoring and reporting mechanism.

ROLE AND DUTIES OF CSR COMMITTEE

Role of CSR committee would as per the terms of reference decided by the Board and inter alia to perform the following functions:

1. Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the CSR activities to be undertaken by the company.
2. To give preference to the local areas in its CSR Activities.
3. Recommend the amount of expenditure to be incurred on the each activity.
4. Fix the time schedule to complete the each CSR Activity.
5. Any other activity (ies) functions as may be assigned by the Board from time to time.

COMPLAINE AND MONITORING

The CSR committee shall have power to constitute such sub-committees as it may deem appropriate for the following:

☒ Implementation of the projects as may be approved or recommended by the CSR Committee.

☒ To monitor the CSR projects/ programmes.

AMENDMENTS

CSR Policy would be subject to revision/ amendment by the Board of Directors of the Company based on the recommendations of the CSR Committee or else in accordance with the guideline on the subject as may be issued, from time to time.

DISCLOSURE

The company shall report about its CSR activities along with its annual report. The information is also available on company website.

REVIEW

This policy is framed pursuant to the provisions of the Companies Act 2013 and rules there under. In case of any subsequent changes in the provisions of the Companies Act 2013 or any other regulations which makes any of the provisions in the policy inconsistent with the Act or regulations, then the provisions of the Act or regulations would prevail over the policy and the provisions in the policy would be modified in due course to make it consistent with law.

This policy shall be reviewed by the CSR Committee as and when any changes are to be incorporated in the policy due to change in regulations or as may be felt appropriate by the Committee. Any changes or modification on the policy as recommended by the Committee would be given for approval of the Board of Directors.