



SILVERLINK TECHNOLOGIES PVT. LTD.

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PREAMBLE

India is one of the largest growing economies in the world. However, it continues to be deluged with various problems and challenges of poverty, health hazards, environmental degradation, illiteracy, poor educational standards, inadequate infrastructure, power crisis gender bias and the largest number of undernourished children as well as uneven distribution of wealth which many believe, is the root cause of social unrest.

The concept and need for Corporate Social Responsibility (CSR) has gained prominence from all avenues. The Government as well as regulators has framed various guidelines pertaining to responsibilities of business as well as the mandatory Corporate Social Responsibility provisions under the Companies Act, 2013 and rules made there under.

It is recognized that integrating social, environmental and ethical responsibilities into the governance of businesses ensures their long term success, competitiveness and sustainability.

This approach also reaffirms the view that businesses are an integral part of society and have a critical and active role to play in the sustenance and improvement of healthy ecosystems, in fostering social inclusiveness and equity, and in upholding the essentials of ethical practices and good governance.

Silverlink Technologies Private Limited ("Silverlink"), believes that in alignment with its the vision, Silverlink through its CSR initiatives will continue to enhance value and promote social sustainability, sustainable development of the environment and social welfare of the people and society at large, more specifically for the deprived and underprivileged persons.

CSR VISION STATEMENT

Silverlink, through its CSR initiatives, strives to create value in the society and in the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth for the society and community.

OBJECTIVE

The main objective of CSR policy is to make CSR a key business process for sustainable development of the society. Silverlink will act as a good corporate citizen and aims at



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supplementing the role of Government in enhancing the welfare measures of the society within the framework of its policy.

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

The Corporate Social Responsibility Committee shall consist of two members i.e. Mr. Raya Narayan Dhople and Mrs. Janhavi Ashish Dhople. The Committee shall hold meetings as and when required, to discuss various issues on implementation of the CSR Policy of Silverlink.

The CSR Committee shall:

- (a) Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by Silverlink as specified in Schedule VII of the Companies Act 2013 (the Act);
- (b) Recommend the amount of expenditure to be incurred on the activities referred to in clause (a) in a financial year;
- (c) Monitor the Corporate Social Responsibility Policy of Silverlink from time to time.
- (d) Any other matter as may be considered expedient in furtherance of and to comply with the CSR Policy of Silverlink.

CSR ACTIVITIES

Silverlink shall identify any one or more of the following areas for its CSR activities:

1. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and



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- maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
5. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
 6. Measures for the benefit of armed forces veteran, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
 7. Training to promote rural sports nationally recognized sports and Olympic sports;
 8. 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 and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
 9. Contributions or funds provided to technology incubators located within academic Institutions which are approved by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government;
 10. 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);
 11. Rural development projects;
 12. Slum area development (the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force);
 13. Disaster management, including relief, rehabilitation and reconstruction activities.

Preference shall be given to local area and areas around Silverlink for spending the amount earmarked for CSR.



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The Board of Directors shall, after taking into account the recommendations made by the CSR committee, approve the CSR policy for Silverlink and disclose its contents in their report and also publish the details on Silverlink's website, if any, in such manner laid down in the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended and modified from time to time.

The Board of Directors shall ensure that Silverlink spends at least 2% of the average net profits of Silverlink made during the 3 immediately preceding financial years in pursuance of its CSR Policy. The Board of Directors may decide to undertake its CSR activities recommended by the CSR Committee, through a registered Trust or a registered society registered for atleast 3 (three) years.

Silverlink may also collaborate with other Companies for undertaking projects or programs for CSR activities in such a manner that the CSR Committees of the respective Companies are in a position to report separately on such projects or programmes.

CSR EXPENDITURE

For achieving its CSR objectives through implementation of meaningful & sustainable CSR programmes, Silverlink will allocate 2% of its average net profits made during the 3 immediately preceding financial years as its Annual CSR Budget. The Annual CSR Budget shall be spent on activities laid down as under mentioned. CSR projects or programs or activities undertaken in India only shall amount to CSR Expenditure. Any unspent/unutilised CSR allocation of a particular year, will be carried forward to the following year, that is, the CSE Budget will be non-lapsable in nature.

CSR expenditure shall include all expenditure including contribution to corpus, for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity with the CSR Policy.

IMPLEMENTATION

CSR programmes will be undertaken by various work centres/locations of Silverlink to the best possible extent within the defined ambit of the identified Project/ Program. The time period/duration over which a particular programme will be spread, will depend on its nature, extent of coverage and the intended impact of the programme. By and large, it may be ensured that the CSR programmes shall be executed in and around the areas adjoining Company's workplace and factories/ Project sites/ work centres.



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POWERS FOR APPROVAL

CSR programmes as may be identified by each work centre/corporate office will be required to be put up to the CSR Committee of the Board at the beginning of each financial year.

MONITORING AND FEEDBACK

To ensure effective implementation of the CSR programmes undertaken at each work centre, a monitoring mechanism will be put in place by the work centre head. The progress of CSR programmes under implementation at work centre will be reported to corporate office on a monthly/quarterly basis. The CSR Committee at the corporate office will conduct impact studies on a periodic basis, through independent professional third parties/professional institutions, especially on the strategic and high value programmes. Work centres and locations will also try to obtain feedback from beneficiaries about the programmes. Appropriate documentation of Silverlink's CSR Policy, annual CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis.

CSR initiatives of Silverlink will be reported in the Annual Report of Silverlink & the Board's Report in compliance with Section 135 and rules made thereunder.

GENERAL

In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to CSR Committee. In all such matters, the interpretation & decision of the Committee shall be final. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from Government, from time to time. Silverlink reserves the right to modify, add, or amend any of these Policy Rules/Guidelines.

By Order of the Board,
For Silverlink Technologies Private Limited,

Mrs. Janhavi Dhople
Director
DIN: 02772055

