



KARO
S A M B H A V
Closing Material Loops



Time is Now!

Let's make

circular economy

possible.

Corporate Social Responsibility

Policy Document

Table of Contents

1. Preamble	3
2. Visions and Objectives	3
3. Focus Area	3
4. Implementation Approach	4
5. Governance Structure	4
6. CSR Budget	4
7. Monitoring and Reporting	4
8. Treatment of Surplus and Assets	4
9. Amendments	5

1. Preamble

Karo Sambhav Private Limited ("the Company") believes that responsible business growth must go hand in hand with social and environmental stewardship. The Company is committed to contributing to sustainable development and creating positive impact for communities, the environment, and the wider ecosystem in which it operates.

This CSR Policy has been formulated in accordance with the provisions of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time. Even where statutory thresholds may not be applicable in a particular year, the Company endeavours to pursue CSR initiatives voluntarily in line with its values and long-term vision.

2. Visions and Objectives

The objectives of the CSR Policy are to:

- Contribute to environmental sustainability and conservation of natural resources;
- Support community development and inclusive growth;
- Promote awareness and responsible behavior towards waste management and circular economy;
- Strengthen grassroots initiatives through collaboration with credible partners;
- Ensure that CSR projects create measurable, long-term social impact.

3. Focus Area

The Company shall undertake CSR projects and programs falling within the activities specified in **Schedule VII** of the Companies Act, 2013. Key focus areas include:

1. Environmental Sustainability

- Conservation of natural resources and promotion of renewable energy
- Ecological balance, waste reduction, recycling, and circular economy initiatives
- Awareness on responsible consumption and waste management practices

2. Community Development

- Capacity building of community groups and informal sector workers
- Livelihood enhancement and socio-economic empowerment
- Support for education, skill development, and digital inclusion

3. Awareness & Outreach

- Public campaigns on responsible e-waste and solid waste management
- Collection drives and citizen engagement programs
- Partnerships with institutions, schools, local bodies, and civil society

4. Implementation Approach

- CSR activities may be implemented **directly by the Company** and/or **through implementing agencies** such as registered trusts, societies, Section 8 companies, NGOs, or government bodies having valid CSR registration.
- The Company may collaborate with other companies or stakeholders to leverage collective expertise and maximize impact.
- Projects may be undertaken at local, regional, or national level depending on need and relevance.

5. Governance Structure

- Where applicable under law, the Board shall constitute a **CSR Committee** to recommend projects, budgets, and monitoring mechanisms.
- In cases where CSR Committee constitution is not mandatory, the **Board of Directors** shall discharge these functions.
- The Board shall approve the annual CSR plan and oversee its implementation.

6. CSR Budget

- The CSR expenditure shall be in line with the requirements of the Companies Act, 2013, as applicable to the Company for the relevant financial year.
- Unspent amounts, excess spending, and set-off shall be treated in accordance with applicable rules.

7. Monitoring and Reporting

- The Company shall institute appropriate monitoring mechanisms including progress reviews, utilization tracking, and outcome assessment.
- Details of CSR activities shall be disclosed in the Board's Report and other filings as required under law.
- Impact assessment shall be undertaken wherever mandated or considered necessary.

8. Treatment of Surplus and Assets

- Any surplus arising out of CSR projects shall not form part of business profits and shall be redeployed for CSR activities only.
- CSR assets, if created, shall be held in the manner prescribed under applicable rules.

9. Amendments

This Policy may be amended by the Board of Directors from time to time to ensure alignment with statutory requirements and the evolving priorities of the Company.



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Thank you!

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