STERLING POWERGENSYS LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Policy:

Sterling Powergensys Ltd (SPL) is committed to operate and grow its business in a socially responsible way. Our vision is to grow our business whilst reducing the environmental impact of our operations and increasing our positive social impact.

This policy outlines our Corporate Social Responsibility agenda. Our aim is to achieve responsible growth and we will inspire to bring this to life by focusing our activities on Solar Products, both in a large Mega Watt (MW) scale by installation and commissioning of Solar Power Plants, and encourage people to embrace this philosophy by offering Solar Power Plants in smaller & affordable Kilo Watt (KW) scale , for Individual Consumers, for home, Agriculture and Offices. Both the above actions will add up to make a big difference.

Corporate Social Responsibility (CSR) Principles:

SPL's CSR Policy is supported by the following principles:

- We are committed to conducting our operations with integrity and respect, in the interest of our stakeholders, and in line with our Code of Business Principles.
- We believe growth and environmental sustainability need not be conflicting. Our business model is designed to deliver sustainable growth. The inputs to the model are our 25 years of experience, our people and our operations. The outputs to the model are sustained growth, lower environmental impact and positive social impact.
- We collaborate and engage with different stakeholders including Governments, NGOs, Suppliers, Farmers, and Channel Partners to tackle the challenges faced by the society.
- In accordance with Section 135(5) of the Companies Act, 2013 (the Act),SPL is committed to spend at least 2% of its average net profits made during the three immediately preceding financial years in some of the identified activities that are listed in Schedule VII (as amended) to the Act.

Governance mechanism:

- We follow structured governance procedures to monitor CSR activities. Our CSR Policy is governed by the Board of Directors of the Company. The Board has constituted a CSR Committee comprising of an Independent Chair and a majority of Independent Directors to monitor the Policy and the programs from time to time.
- The activities described in Annexure A appended hereto are covered under Schedule VII (as amended) of the Act, that lists down permitted activities that constitute such activities. These activities undertaken by the Company are not expected to lead to any additional surplus beyond what would accrue to the Company in the course of normal operations.

- The Policy issued pursuant to the Corporate Social Responsibility Policy Rules, 2013 has been recommended by the CSR Committee of the Board and adopted by the Board of Directors. It can be downloaded from our corporate website www.sterlingpowergensysltd@gmail.com
- Our current CSR activity with it's execution modality and implementation schedule is appended below as Annexure A. The Company may take up other CSR activities as may be appropriate.

| Sr.No: | 1 |
|------------------------|---|
| SPL initiative : | Project Roshni |
| Schedule VII activity: | Design and Built a Efficient Solar Power Plant for Households , on a 'No Profit Basis' who are not connected to the Grid Power Supply. These plants will be fully built and ready to install ,as a Do It Yourself (DIY) kit , along with One Electric Bulb, One Mobile Charger Point , One Fan, and One Induction heater for Cooking. |
| Execution details | The Solar Power will eliminate use a Non Renewable sources being used for cooking like Kerosene, eliminate destruction of forests for fire wood , support Children's Education by providing light in the evening times to study , better connectivity through mobile phones , thus improving their Quality of Life. SPL will work with Rural Entrepreneurs (RE), and with Corporates as their CSR partners, all these supported by SPL's Channel Partners. Products are sold in the normal course at a discounted price. The RE then sells these goods directly to consumers (through home to home selling). |
| Target and timeline : | The company will launch this initiative during the current financial year in the villages in a bid to develop an entrepreneurial mindset and make them financially independent and more empowered. |

Annexure A