

**SUBA HOTELS LIMITED  
(FORMERLY KNOWN AS SUBA HOTELS PRIVATE LIMITED AND HOTEL SUBA STAR  
PRIVATE LIMITED)**

**CORPORATE  
SOCIAL RESPONSIBILITY  
POLICY**

**SUBA HOTELS LIMITED**  
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In accordance with the provisions of Section 135 of Companies Act, 2013 (the Act) read along with Companies (Corporate Social Responsibility Policy) Rules, 2014 and such other rules, regulations, circulars, and notifications as may be applicable and as amended from time to time, the Corporate Social Responsibility (CSR) Committee of **Suba Hotels Limited (Formerly known as Suba Hotels Private Limited and Hotel Suba Star Private Limited)** (“the Company”) was constituted by the Board of Directors of the Company at their meeting held on Friday, 28<sup>th</sup> June, 2024.

The composition of the said Committee comprises of the below mentioned directors:

Sr No.	Name of the Member	Nature of Directorship	Designation
1.	Mr. Chandrashekar Shivalingappa Payannavar	Non-Executive Independent Director	Chairperson
2.	Mr. Mubeen Mansur Mehta	Whole-time director and CEO	Member
3.	Mr. Mansur Abubaker Mehta	Chairman and Managing Director	Member

## 1. OBJECTIVE

The Objectives of the CSR Policy will be as follows:

- i) To carry out CSR activities in an economically, socially and environmentally sustainable manner that is transparent and ethical.
- ii) To ensure the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.
- iii) To create opportunities for employees to participate in socially responsible initiatives.

## 2. CSR VISION

Our vision is – "to contribute to the social, economic and environmental development of the society and involve ourselves in activities which will build better and sustainable way of life, giving scope for human development."

## 3. SCOPE

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This Policy shall apply to all CSR projects/programmes/activities undertaken by the Company in India as per Schedule VII of the Act and any changes/updates made in the Act thereto will be adopted accordingly. Any other Project / activity not falling within the ambit of the Act under Schedule VII, will not be considered as a CSR Project/activity and the amount spent therein will not be accounted for CSR Expenditure of the Company.

**4. DEFINITIONS**

**4.1. "CSR"** means and includes but is not limited to: -

- (i) Projects or programs relating to activities specified in Schedule VII to the Act; or
- (ii) Projects or programs relating to activities undertaken by the board of Directors of the company (Board) subject to the condition that such Projects will cover subjects enumerated in Schedule VII of the Act.

**4.2. "CSR Committee"** means the CSR Committee of the Board referred to in Section 135 of the Act.

**4.3. "CSR Policy"** relates to the activities to be undertaken by the Company as specified in Schedule VII to the Act and the expenditure thereon, excluding activities undertaken in pursuance of normal course of business of a Company.

**4.4. "Net Profit"** means the net profit of the Company as per its financial statement prepared in accordance with applicable provisions of the Act (Section 198), but shall not include the following namely :-

- (i) Any profit arising from any overseas branch or branches of the Company, whether operated as a separate Company or otherwise and
- (ii) Any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act

Provided that net profit in respect of a financial year for which the relevant financial statements were prepared in accordance with the provisions of the Companies Act, 2013 shall not be required to be re-calculated in accordance with the provisions of the Act.

**5. BUDGET & APPROVAL**

**5.1.** The budgetary allocation for CSR Projects/activities for the year will be based on the profitability of the Company. The budget allocation for the CSR Projects will be minimum 2% of the Average Net Profits of the Company made during the three immediately preceding financial years.

**5.2.** The Board is the Competent Authority for approving the policy on Corporate Social Responsibility

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of the Company based on the recommendation of the CSR Committee of the Board.

**6. CSRACTIVITIES**

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

- i. Eradicating hunger, poverty and malnutrition, promoting preventive 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;
- ii. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- iii. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- iv. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and 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;
- v. 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;
- vi. Measures for the benefit of armed forces veterans, war widows and their dependents;
- vii. Training to promote rural sports, nationally recognized sports, sports and Olympic sports;
- viii. Contribution to the Prime Minister's National Relief Fund or 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;
- ix. (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  
(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE);

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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).

x. Rural development projects

xi. Slum area development

*For the purposes of this item, 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.*

xii. Disaster management, including relief, rehabilitation and reconstruction activities

The above list is illustrative not exhaustive. All activities under the CSR activities should be environment friendly and socially acceptable to the local people and Society.

## **7. IMPLEMENTATION PROCESS**

Education, Environment, Health care and Sustainable Livelihood are most basic requirements and needs of the all sections of the society. To ensure that these requirements reach each and every section of the society is a responsibility of society as a whole. In most of the places, the weaker section of the society always gets deprived of at least one of the above basic necessities. Accordingly, the Company is willing to contribute and perform its CSR in a way which will enhance the possibilities of meeting these requirements of each member of the weaker section of the society.

In order to adhere to its CSR, the Company is exploring various organizations that are working towards upliftment of the weaker sections of the Society. The Company proposes to fulfill its CSR in following manner:

### **In Education, our endeavor is to contribute to:**

- Academic education by way of financial assistance to Primary, Middle and Higher Secondary Schools
- Organizations providing education to weaker sections
- School specifically meant for girl child
- Schools for Blind people
- Schools for Handicaps
- Orphanage Houses

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**In Environment our endeavor is to contribute to**

- Pollution Control
- A forestation, plantation, Social Forestry, Check Dams, Park.

**In Health Care our endeavor is to contribute to:**

- Primary health care centres
- Mother and Child care projects
- Blood donation camps
- Camps for visually impaired and physically challenged people
- Social evils like alcohol, smoking, drug abuse etc.

**In Sustainable Livelihood our endeavor is to contribute to:**

- Organizations providing better livelihood to weaker sections.
- Organizations promoting women empowerment
- Projects undertaking agriculture development

**8. CSRMONITORING ANDREPORTING FRAMEWORK**

The CSR Committee shall monitor the implementation of the CSR Policy through periodic reviews of the CSR activities.

The respective CSR personnel will present their annual budgets along with the list of approved CSR activities conducted by the Company to the CSR Committee together with the progress made from time to time as a part of the evaluation process under the monitoring mechanism.

**9. CSR EXPENDITURE**

The CSR activities undertaken in India only shall amount to CSR Expenditure.

CSR Expenditure shall include all expenditure including contribution to corpus for CSR activities approved by the Board on the recommendation of the CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act.

**10. DISCLOSURE OF THE POLICY**

The CSR policy recommended by the CSR Committee and approved by the Board shall be displayed on the Company's website and shall be disclosed in the Board's report as well.

**11. CSRREPORTING**

The Board Report of a Company shall include an Annual Report on CSR containing particulars

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specified in Annexure to the CSR Rules as per the prescribed format.

**12. FREQUENCY OF MEETINGS**

The meetings of the Committee could be held at such periodic intervals as may be required.

**13. QUORUM**

Minimum two (2) members shall constitute a quorum for the Committee meeting.

**14. MINUTES OF THE COMMITTEE MEETING**

Proceedings of all meetings shall be recorded in the minute's book maintained for that purpose.

**15. AMENDMENTS TO THE POLICY**

This amended policy was adopted on the recommendation of CSR Committee in the Board meeting held on 09<sup>th</sup> August, 2024.

The Board of Directors on its own and/or on the recommendation of CSR committee can amend its policy as and when required deemed fit. Any or all provisions of CSR Policy would be subjected to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.

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