



KINTECH SYNERGY

PRIVATE LIMITED

(CIN: U29120GJ1995PTC027101)

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

(Revised CSR Policy incorporating the amendments made in CSR Rules, 2014 approved by the Board of Directors at their meeting held on March 5, 2021)

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POLICY ON CORPORATE SOCIAL RESPONSIBILITY (CSR)

1) CONCEPT AND INTRODUCTION:

Kintech Synergy Private Limited is a forum of technical zealot having been enlisted in technical consultation and Project execution in the field of Power Generation and Distribution. In Non-Conventional Power Generation project, our expertise unfolds right from the recognition of the sites and Machinery, Installation & Commissioning there after Operation & Maintenance of the Project. The project execution work includes Civil, Erection and Electrification. Besides these, we hold workshop facilities for repairing of electronics, hydraulic and pneumatic equipments and fabrication of structure.

The Company, as a corporate concern, understands its social and environmental responsibility towards the environment, its consumers, employees, and other stakeholders and is continuously committed to perform with full dedication, enthusiasm and strength towards the improvement of society and thereby is willing to fulfill its national obligations as a corporate citizen.

Considering this, the Company through its CSR policy and programmes reaches out to make a difference in a myriad ways in the areas of Health and Education. Through its initiatives, the Company reaches out to the community that it forms as a part of, finding new expressions for its mission to create healthier communities globally.

The Ministry of Corporate Affairs (“MCA”) has introduced the concept of Corporate Social Responsibility (“CSR”) in the Companies Act, 2013. CSR is a Company’s sense of responsibility towards the community and environment in which it operates. It is a continuing commitment by businesses to behave ethically and contribute to economic development of the society at large and building for sustainable livelihoods.

Kintech Synergy Private Limited has formulated and adopted this Corporate Social Responsibility Policy (“CSR Policy”) in accordance with the applicable provisions of Section 135 of Companies Act, 2013 (“Act”) and the Companies (Corporate Social Responsibility) Rules, 2014 framed thereunder (including any statutory amendments, modifications). This Policy aims to lay down guidelines for CSR activities and to bring a positive impact on the society and environment where it operates as a part of its social objectives.

This policy titled as the 'Kintech Synergy Private Limited - CSR Policy' encompasses the Company's philosophy for CSR, its responsibility as a corporate citizen and provides the broad guidelines and framework for undertaking programmes that can have a meaningful impact on the communities of which the Company forms a part of and the society at large. The policy shall apply to all the CSR initiatives undertaken by the company at various locations in keeping with the guidelines enlisted in the Schedule VII of the Companies Act, 2013. CSR policy will be periodically reviewed and appropriately revised by the CSR Committee and the Board of Directors of the Company from time to time. The approach of Kintech Synergy Private Limited (KSPL) towards CSR will be oriented to identify and formulate projects in response to the need of society and to implement them with full involvement and commitment in a time bound manner and to take all the reasonable steps for fulfillment of projects to be undertaken as a part of CSR activities alongwith providing all the facilities which are required for the targeted beneficiaries.

2) CSR VISION:

"To actively contribute to the social and economic development of the society in which we operate. In so doing, build a better, sustainable way of life for the weaker sections of society and raise the country's human development index".

3) CSR ACTIVITIES:

Activities proposed to be carried out in future by the Company as specified in Schedule VII of the Companies Act, 2013 of our CSR vision would include the following:

- i) 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.
- 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 art and handicrafts;
- vi) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- vii) Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports;
- viii) 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 govt. for socio economic development and relief and welfare of the schedule caste, 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); 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.

Explanation - 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.

Any other project as may be specified under Schedule VII of the Companies Act, 2013 by way of amendments or notification or circular or clarification issued by Ministry of Corporate Affairs from time to time relating to CSR activities shall be deemed to form part of this CSR Policy.

CSR Policy and initiatives/activities thereunder will be based on Social Commitment and necessarily be community oriented with focus on an integrated, overall, inclusive, equitable and collective approach. The CSR Policy will aim at socio-economic development schemes with the primary goal of ensuring that its benefits reach the targeted beneficiaries.

The Company shall also ensure that in identifying its CSR Projects, preference shall be given to the local area and areas around which the Company (including its Units) operates. However, this shall not bar the Company from pursuing its CSR objectives in other areas, as prescribed under Schedule VII of the Act and the amendments thereto.

The CSR activities will include Research and Development work for COVID-19 i.e. new drugs, vaccines and medical devices related to COVID 19, for the financial year 2020-21, 2021-22 and 2022-23, which are carried out in collaboration with the institutes or organizations mentioned in item (ix) of Schedule VII of the Act.

❖ EXCLUSIONS :

The CSR Projects shall include all the activities undertaken by the Company in pursuance of its statutory obligation laid down in section 135 of the Act and in accordance with the provisions contained in CSR Rules, but shall not include the following:

- a) Activities undertaken in normal course of business;
- b) Activities undertaken outside India;
- c) Political contribution under section 182 of the Companies Act, 2013;
- d) Activities benefiting employees of the Company as defined in section 2(k) of Code of Wages, 2019;

- e) Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- f) Any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
- g) Activities carried out for fulfilment of any other statutory obligation.

4) CSR ANNUAL ACTION PLAN AND LOCATION OF CSR EFFORTS:

The CSR Committee shall decide on the locations for CSR activities and formulate and recommend to the Board for approval of a CSR annual action plan, which shall include the following, namely: -

- (a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- (b) the manner of execution of such projects or programmes;
- (c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- (d) monitoring and reporting mechanism for the projects or programmes; and
- (e) details of need and impact assessment, if any, for the projects undertaken by the Company.

The Board may modify the annual action plan as per the recommendations of the CSR Committee at any time during the financial year, based on reasonable justification.

5) IMPLEMENTATION:

- a) Keeping in line with Section 135 of the Companies Act, 2013 and the Rules made thereunder, the Company has constituted CSR Committee under the chairmanship of any Director as may be decided by the Board of Directors which has formulated and recommended the CSR Policy to the Board of Directors, and henceforth shall recommend the amount of expenditure to be incurred on CSR activities every year in lines with the statutory provisions and monitor the implementation of the CSR policy periodically.
- b) The Board shall be responsible for implementing the mandate of the CSR Policy and shall ensure that the CSR activities are carried out in accordance with the CSR Policy read with

the Act and CSR Rules and the annual action plan formulated and recommended by the CSR Committee.

- c) CSR projects or programs or activities shall be undertaken in India Only.
- d) The CSR Activities may be undertaken by the Company directly or with the prior approval of the Board, through any of the following entities as “Implementation Agency” being duly registered with the Ministry of Corporate Affairs website and having a unique CSR Registration Number (with effect from 1 April 2021):
- e) Company established under section 8 of Indian Companies Act 2013, or registered public trust, or registered society under section 12-A and 80-G of the Income Tax Act 1961, being established by the Company, either singly or along with any other company;
- f) Company established under section 8 of Indian Companies Act 2013, or registered Trust, or registered Society, being established by (Indian) Central Government or (Indian) State Government;
- g) Company established under section 8 of Indian Companies Act 2013, or registered public Trust, or registered Society registered under section 12-A and 80-G of the (Indian) Income Tax Act 1961, and having an established track record of at least three years in undertaking similar CSR activities; or
- h) Any entity established under an act of (Indian) Parliament or a (Indian) State Legislature.
- i) The Company shall conduct due diligence prior to selection of an entity as its implementation agency, to *inter alia* verify the credentials and ensure that the proposed implementation agency is eligible and capable to be appointed as such.
- j) The Company may engage international organizations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR policy as well as for capacity building of their own personnel for CSR.
- k) The Company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with Companies (Corporate Social Responsibility Policy) Rules, 2014 (including any statutory amendments and modifications).

6) **FUNDING AND ALLOCATION:**

- a) For achieving its CSR objectives through implementation of meaningful & sustainable CSR programs / projects / Activities, KSPL will allocate at least 2% of its average Net Profits

(calculated as per Section 198) made during the immediately preceding three financial years, as its Annual CSR Budget, or as stipulated in the relevant statute from time to time. The Annual CSR Budget shall be spent on projects / activities as laid down in this Policy.

- b) “Administrative Overheads” expenses incurred by the Company will be used for ‘General Management & Administration’ of the Corporate Social Responsibility functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.
- c) Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR Policy and Annual Action Plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- d) Transfer of unspent CSR amount - Until a separate fund is specified by the Government, the unspent CSR amount, if any, shall be transferred by the Company to a fund specified in Schedule VII of the Act.
- e) The company shall continue to focus on group projects, new & ongoing projects and give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility activities.

Note : “Ongoing Project” means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification;

- f) Total expenditure in the CSR Annual Plan shall be approved by the Board upon recommendation by the CSR Committee.
- g) In case the Company fails to spend the statutory minimum limit of 2% of Company's average net profits of the immediately preceding three years, in any given financial year, the unspent amount, relating to a project, other than ongoing project, shall be transferred to any fund included in Schedule VII of the Act (until a fund is specified in Schedule VII of the Act) within a period of six months from the expiry of the financial year and Board shall specify the reasons for the same in its report in terms of clause (o) of sub section {3} of

section 134.

- h) The unspent amount relating to ongoing project shall be transferred within a period of thirty days from the end of the financial year to a special account which will be opened by the Company in that behalf in that financial year in any scheduled bank to be called 'Unspent Corporate Social Responsibility Account and such amount will be spent by the Company in pursuance of its obligation towards the CSR Policy within a period of three financial years from the date of such transfer, failing which the Company will transfer the same to a fund specified in Schedule VII within a period of thirty days from the date of completion of third financial year.
- i) The Company may build CSR capacities of their own personnel or personnel of its Trust or Society, as well as those of the Implementation Agency through institutions with established track records of at least three Financial Years but such expenditure shall not exceed 5% of the Approved Budget of the Company in one Financial Year.
- j) Expenses incurred by the company shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.
- k) Surplus arising out of CSR activities shall not form part of business profits and shall be ploughed back in the same project or shall be transferred to unspent CSR Account and spent in pursuance of CSR policy and annual action plan or transfer such surplus amount to a fund specified in Schedule VII within a period of six months of the expiry of the financial year.
- l) An amount spent in excess of the requirements, such excess amount may be set off against the requirements to spend upto immediate succeeding three financial years subject to conditions that:
 - i) The excess amount available for set off shall not include the surplus arising out of CSR activities.
 - ii) The Board of the Company shall pass a resolution to this effect;
- m) If CSR amount is spent by the Company for creation or acquisition of a capital asset, it shall be held by Section 8 Company or beneficiaries of said CSR project in form of self-help groups, collectives, entities or a public authority.
- n) The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.

7) MONITORING AND FEEDBACK:

- a) To ensure effective implementation of the CSR projects/programs/ activities undertaken at work center, a monitoring and evaluation mechanism shall be put in place by the work center head.
- b) The progress of the CSR projects/programs/activities under implementation shall be reported to the CSR Committee on periodic basis with full details of cost incurred and results achieved on a regular basis.
- c) Appropriate documentation of any change in KSPL's CSR Policy, annual CSR activities conducted, executing agencies, and expenditure entailed shall be undertaken on a regular basis.
- d) CSR initiatives of the Company will be reported in the Annual Report and the Board's Report in compliance with Section 135 of the Companies Act, 2013 as required by the statutory provisions applicable.
- e) The disbursal of funds shall be submitted to the Board as a part of review along with the details of how the funds have been utilized, which shall be certified by the Company's CFO or the person responsible for financial management shall certify to that effect. In case of an ongoing project, the implementation along with the approved timelines and year-wise allocation will be presented to the Company's Board.

8) CSR IMPACT ASSESSMENT REPORT:

- a) Impact assessment, if and when mandated, will be undertaken by an independent agency and such impact assessment report shall be placed before the Board and annexed to the annual report of CSR.

9) DUTIES AND RESPONSIBILITIES:

i) Board of Directors :-

- a) The Board of Directors shall, after considering the recommendations made by the CSR committee, approve the CSR policy and the Annual CSR Action Plan of the company.
- b) The Board of Directors shall endeavor that the Company spends 2% of the average pretax net profits of the Company made during the 3 immediately preceding financial years in pursuance of its CSR Policy.
- c) The Board of Directors of the Company shall disclose the composition of the CSR

Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.

- d) The Board may extend a non-ongoing project beyond one year based on reasonable justification.
- e) The Board shall ensure that the CSR activities are undertaken by the Company itself or through a registered and eligible Implementation Agency.
- f) The Board of the Company shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- g) In case of ongoing project, the Board of the Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- h) The Board may alter the CSR Annual Action Plan at any time during the financial year, as per the recommendation of its CSR Committee, based on reasonable justification to that effect.
- i) The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.
- j) Where the Company spends an amount in excess of requirement, such excess amount may be set off by the Board against the requirement to spend up to immediate succeeding three financial years subject to the conditions that – (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any. (ii) the Board of the Company shall pass a resolution to that effect.

ii) CSR Committee:-

The role of CSR Committee is:

- a) To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of Section 135 of the Companies Act 2013.
- b) To recommend the amount of expenditure to be incurred on the specified activities in a financial year.
- c) To monitor the Corporate Social Responsibility Policy of the Company from time to time

alongwith the CSR Plan and also shall keep record of the total funds utilized for the above activities by the organization and also other expenditure incurred for the purpose of implementing the said policy. For this purpose, the CSR Committee shall meet at regular intervals with at least once every year.

- d) To recommend the Board on the guiding principles for selection, implementation and monitoring of CSR activities.
- e) To formulate and recommend to the Board, an Annual CSR Action Plan in pursuance of its CSR policy.
- f) To recommend the Board to alter the Annual CSR Action Plan at any time during the financial year based on the reasonable justification to that effect.
- g) Any other matter/thing as may be considered expedient by the members in furtherance of and to comply with the CSR Policy of the Company.
- h) In discharge of CSR functions of the Company, the CSR Committee shall be directly responsible to the Board for any act that may be required to be done by the CSR Committee in furtherance of its statutory obligations, or as required by the Board.

10) REVIEW & AMENDMENTS:

- a) The provisions of the Act and the CSR Rules (as amended from time to time) and any Notification/ Circular/ clarifications issued by Authorities, shall automatically apply and be part of this CSR Policy.
- b) This policy shall be reviewed by the CSR Committee and/or Board as and when any changes are to be made in the Policy. Any changes or modification in the Policy as recommended by the Committee shall be presented to the Board for their approval.

Approved by the Board at its Meeting held on April 22, 2016 and further amended and approved by Board of Directors of the Company at its meeting held on March 05, 2021.