

SINTEX-BAPL LTD.

(Formerly known as BRIGHT AUTOPLAST LIMITED)

2011, 2nd Floor, Farena Corporate Park, Hadapsar - Kharadi bypass Road, Hadapsar, Pune - 411013.

Tel: +91 20 71055600 E-mail : info@brightautoplast.com



SINTEX-BAPL LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

A. Introduction

As per the Companies Act, 2013 constitution of a Corporate Social Responsibility (CSR) Committee of the Board and formulation of a Corporate Social Responsibility Policy is required for certain class of companies.

SINTEX-BAPL LIMITED is committed to utilize its Human and Financial Resources for the benefit of needy people as mandated by Indian Companies Act, 2013 and rules made there under. SINTEX-BAPL LIMITED believes that by taking up appropriate activities and projects, and carefully targeting beneficiaries, it can help in raising human development index as well as transform the lives of the beneficiary for better living on sustainable basis.

SINTEX-BAPL LIMITED is conscious of its obligations as a responsible corporate entity to promote social harmony, increasing opportunities for socially and economically disadvantaged sections of the society. SINTEX-BAPL LIMITED will endeavor to carry out various activities which have been stated in Schedule VII of the Companies Act, 2013 and rules made there under."

B. CSR Object

The Company firmly believes that CSR is primarily, the responsibility of the Company in relation to the impact of its decisions and activities on the society and also the environment, through a transparent and ethical behavior which is:

- (a) consistent with sustainable development and welfare of society,
- (b) takes into account the expectations of stakeholders,
- (c) is in compliance with applicable law

C. SCOPE

- i) eradicating hunger, poverty and malnutrition, promoting health care including 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;

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- (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 recognised sports, paralympic sports and Olympic sports;
- (viii) contribution to the Prime Minister's National Relief 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 classed, minorities and women;
- (ix) contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) Rural development projects;
- (xii) slum area development and
- (xiii) Any other activity as may be prescribed by the Central Government from time to time.

D. Definitions

In this Policy, unless the context otherwise requires:

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1. **"Act"** shall mean the Companies Act 2013, including any modifications, amendments or re-enactment thereof.
2. **"Rules"** shall mean the Companies (CSR Policy) Rules, 2014 under Companies Act 2013.
3. **"Agency"** (or Agencies) means any Section 8 Company or a registered trust/ society/NGO/ institution, performing social services for the benefit of the society and excluding a registered trust/society/ NGO/institution/ Section 8 Company which is formed by the Company or its holding or subsidiary company/companies.
4. **"Approved Budget"** shall mean the total budget as approved by the Board of the Company upon the recommendation of the CSR Committee, which is to be utilized for CSR Projects.
5. **"Approved Projects"** shall mean each individual projects approved by the Board recommended by CSR Committee from time to time.

Projects/activities/ programs/ initiatives undertaken in pursuance of normal course of business of the Company and projects which benefit only the employees of the Company and their families shall not be considered as CSR Projects.

6. **"Board"** shall mean the Board of Directors of the Company.
7. **"Company"** shall mean SINTEX-BAPL LIMITED and wherever the context requires, shall signify the Company acting through its Board.
8. **"CSR Committee"** shall mean the Corporate Social Responsibility Committee constituted by the Board of the Company in accordance with the Act, consisting of three or more directors, out of which at least one director shall be an independent director.
9. **"CSR expenditure"** means all CSR expenditure of the Company as approved by the Board upon recommendation of the CSR committee, including the following:
 - i. contribution to CSR Projects which shall be implemented and/or executed by the Company;
 - ii. Any other contributions covered under Schedule VII.

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Contribution of any amount directly or indirectly to any political party under section 182 of the Act, shall not be considered as CSR expenditure.

10. **"CSR Officer"** shall mean an official of the Company for carrying out activities envisaged in the CSR Policy; having due comprehension, understanding, drive and passion for such activities and designated as such, who will be assisted by the 3-4 other officials, provided further that the CSR Officer and the officials to assist him shall be nominated by the Board of the Company.
11. **"CSR Policy"** shall mean the present Corporate Social Responsibility Policy of the Company, which covers the activities to be undertaken by the Company as specified in Schedule VII to the Act and the CSR Expenditure thereon.
12. **"Financial Year"** shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.
13. **"Net profit"** shall mean the net profit as per the Act and Rules based on which the specific percentage for CSR expenditure has to be calculated.
14. **"Thrust Areas"** shall have the meaning as ascribed to them as per provision E of the Policy.

E. Thrust Areas:

While the Company is eligible to undertake any suitable/rightful activity as specified in Schedule VII of the Act, however, at present, it proposes to undertake the relevant activities on priority basis in the following three Thrust Areas:

- i) eradicating hunger, poverty and malnutrition, promoting health care including 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;

F. Identification of CSR Projects:

1. CSR Projects need to be identified and planned for approval of the CSR Committee, with estimated expenditure and phase wise implementation schedules, if the project size requires stage-wise implementation.
2. The Company shall 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 objects in other areas.
3. The CSR Officer may engage external professionals/firms/agencies if required, for the purpose of identification of CSR Projects.

G. Implementation of CSR Projects

The Company shall implement the identified CSR Projects by the following means:

I. Direct Method

1. The Company may itself implement the identified CSR Projects presently within the scope as defined in the Policy;
2. The CSR Officer may engage external professionals/firms/agencies if required, for the purpose of implementation of its CSR Projects.
3. The Company, may collaborate with other companies, if required, for fulfilling its CSR objects through the Direct method, provided that the CSR Committees of respective companies are in a position to monitor separately such CSR Projects.

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**II. Indirect Method**

1. The Company may implement the identified CSR Projects through Agencies, subject to the condition that:

- The activities pursued by the Agency are covered within the scope and ambit of Schedule VII of the Act provided
 - i. The Agency has an established track record of at least three years in undertaking similar programs or projects, and
 - ii. The Company has specified the Project to be undertaken through the Agency, the modalities of utilization of funds on such Projects and the monitoring and reporting mechanism which shall be at least once in three months.

H. Monitoring

Monitoring process for CSR Projects shall include the following:

- Evaluation of Planned progress V/s Actual Progress
- Actual expenditure V/s expenditure as per Approved Budget

I. Fund allocation and Others**A. Fund allocation**

1. The Company, in every Financial Year, shall endeavor to spend the feasible amount, which shall not be restricted by the statutory limit of a specified percentage of its average net profits of the immediately preceding three Financial Years. However, the aforementioned expenditure in any Financial Year shall be at least 2% of Company's average Net profits for the three immediately preceding Financial Years.
2. The CSR Committee shall prepare a CSR Annual Plan for the above which shall include:
 - a. Identified CSR Projects
 - b. CSR expenditure
 - c. Implementation Schedules
3. Total expenditure in the CSR Annual Plan shall be approved by the Board upon recommendation by the CSR Committee

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4. 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 Board shall specify the reasons for the same in its report in terms of clause (o) of sub-section (3) of section 134.

B. Others

1. The CSR Committee shall ensure that major portion of the CSR expenditure in the Annual Plan shall be for the Projects in the Thrust Areas. However, there shall not be any preference given to any particular Thrust Area for budgetary allocation and it shall be made purely as per the identified CSR Projects on need basis.
2. The CSR Officer of the Company is authorized severally to decide on Projects to be implemented through the Indirect Method within the allocation as per the Annual Plan.
3. Any surplus arising out of the CSR Projects shall not form a part of the business profit of the Company.
4. The Company may build CSR capacities of their own personnel as well as those of the Agencies 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. Duties and responsibilities**i. Board of Directors**

The Board shall include in its Report the annual report on CSR Projects as per the format provided in the Annexure to the Rules.

ii. CSR Committee

- i. The CSR Committee shall monitor the implementation of the CSR Policy and CSR Plan. For this purpose, the CSR Committee shall meet in accordance with the requirement.
- ii. In discharge of CSR functions of the Company, the CSR Committee shall be directly responsible to the Board for any act that may be

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required to be done by the CSR Committee in furtherance of its statutory obligations, or as required by the Board.

- iii. The CSR Committee shall place before the Board the draft annual report as per the format in annexure to the Rules in Board meeting where annual accounts of the Company proposed to be approved, for Board review and finalization.
- iv. The CSR Committee shall ensure that the CSR Policy and finalized Annual Plan is displayed on the Company's website.

iii. CSR Officer

- i. The CSR Officer shall be responsible for the proper implementation and execution of CSR Projects of the Company.
- ii. The CSR Officer shall be responsible for monitoring the Projects vis-à-vis the Annual Plan.
- iii. The CSR Officer shall send the half yearly CSR report ending September and March every year for review of the CSR Committee and the Board.
- iv. The CSR Officer shall communicate the relevant feedbacks received by him/her to the CSR Committee.
- v. The CSR Officer shall be directly responsible to the CSR Committee for any act that may be required to be done by the CSR Committee in accordance with the Policy.
- vi. The CSR Officer shall be assisted by a select group of individuals who shall be exclusively dedicated and/or available on priority basis to the CSR Officer, including in Units, as and when required in discharge of all or any of his functions as required under the CSR Policy.

H. Review Periodicity and amendment:

- i. CSR Plan may be revised/modified/amended by the CSR Committee at such intervals as it may deem fit.
- ii. The CSR Committee shall review the Policy every three years unless such revision is necessitated earlier.
