

**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 ("The Company") 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. The Company 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 beneficiaries for better living on sustainable basis.

The Company 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. The Company will endeavor to carry out various activities in areas or subjects specified 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:

- (a) is 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;
- (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;

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- (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) contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Biotechnology (DBT), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) 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 ;
- (xii) disaster management, including relief, rehabilitation and reconstruction activities 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:

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.

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3. **"Agency"** (or Agencies) means a company established under Section 8 of the Act or a registered trust or a registered society, established by the company, either singly or alongwith any other company or a company established under Section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature.
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 corpus or on CSR Projects or programs which shall be implemented and/or executed by the Company;
  - ii. Any other contributions within the areas or subjects specified in Schedule VII of the Act.

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 Policy"** shall mean the present Corporate Social Responsibility Policy of the Company, which covers the activities to be undertaken by the Company in areas or subjects specified in Schedule VII to the Act and the CSR Expenditure thereon.
11. **"Financial Year"** shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.
12. **"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.
13. **"Thrust Areas"** shall have the meaning as ascribed to them as per provision E of the Policy.

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## E. THRUST AREAS:

While the Company is eligible to undertake any suitable/rightful activity in areas or subjects 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 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) 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;
- (v) training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports; and
- (vi) slum area development, disaster management, including relief, rehabilitation and reconstruction activities."

## 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 Committee 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 Committee may engage external professionals/firms/agencies if required, for the purpose of implementation of its CSR Projects.

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3. The company may decide to undertake its CSR activities approved by the CSR Committee, through agency i.e.
  - (a) a company established under section 8 of the Act or a registered trust or a registered society, established by the company, either singly or along with any other company, or
  - (b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature.
4. 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.

## II. Indirect Method

The Company may implement the identified CSR Projects through a Company established under Section 8 of the Act or a registered trust or a registered society, other than those covered under the definition of Agency, provided that such Company or trust or society shall have an established track record of three years in undertaking similar programs or projects and the Company has specified the projects or programs to be undertaken, the modalities of utilization of funds of such projects and programs and monitoring and reporting mechanism.

## 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

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c. Implementation Schedules

3. Total expenditure in the CSR Annual Plan shall be approved by the Board upon recommendation by the CSR Committee
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 Committee is authorized 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 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 is displayed on the Company's website.

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**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 CSR Policy every three years unless such revision is necessitated earlier.

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