

**KONTACT CONSORTIUM INDIA PRIVATE LIMITED**  
**CORPORATE SOCIAL RESPONSIBILITY POLICY**

**1. INTRODUCTION**

The objective of Corporate Social Responsibility (CSR) is to benefit the society by improving the quality of individuals, their families and local community at large.

KONTACT CONSORTIUM INDIA PRIVATE LIMITED (hereinafter to be referred as "the Company") through its CSR activity intends to participate in the overall development of the society.

The Company's CSR policy has been framed in accordance with Section 135 of the Companies Act, 2013 and the rules framed thereunder. This Policy covers all the internal dimensions of the CSR structure and further captures and sets out the process of implementation of the CSR related activities.

**2. SCOPE**

This Policy shall apply to all the CSR projects undertaken by the Company, whether such project is executed in collaboration with any other company / entity or on its own.

**3. DEFINITIONS**

(a) "Act" means Companies Act, 2013 including any statutory modification or re-enactment thereof.

(b) "Board" means Board of Directors of the KONTACT CONSORTIUM INDIA PRIVATE LIMITED.

(c) "Corporate Social Responsibility" (CSR) means the activities undertaken by the Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in the CSR Rules

(d) "CSR Rules" mean the Companies (Corporate Social Responsibility Policy) Rules, 2014 including any amendment thereof.

(e) "CSR Committee" means Corporate Social Responsibility Committee of the Board, if any.

(f) "CSR Policy/ Policy" means Corporate Social Responsibility Policy of KONTACT CONSORTIUM INDIA PRIVATE LIMITED.

(g) “CSR Activities” means the activities to be undertaken by KONTACT CONSORTIUM INDIA PRIVATE LIMITED in areas or subject specified in Schedule VII to the Act and specified under this Policy.

(h) “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.

#### **4. CSR ACTIVITIES**

The Company may undertake / fund projects, programs or activities of the following nature and also undertake such other activities as may be approved by the Board as per Schedule VII of the Companies Act, 2013.

(i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation.

(ii) promoting education, including special education.

(iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes.

(iv) ensuring environmental sustainability, animal welfare.

(v) protection of national heritage, art and culture, 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,

(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; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies etc.

(x) rural development projects

(xi) slum area development.

(xii) All other projects which can form part of CSR activities

## **5. PROJECT IMPLEMENTATION**

5.2.1 The Board shall ensure that the CSR Activities are undertaken by the Company itself or through any of the following implementing agencies –

(i) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961 (43 of 1961), established by the Company, either singly or along with any other company; or

(ii) 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

(iii) any entity established under an Act of Parliament or a State legislature; or

(iv) company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

## **6. OTHERS**

The Board of the Company or its CSR Committee shall monitor the implementation of the CSR projects as required under the Companies Act 2013 and examine whether the funds provided by the Company are utilized in accordance with the approved plans.

The annual action plan of the Company would include the manner of execution of CSR projects or programmes to be undertaken by the Company, the modalities of utilization of funds and implementation schedules for the projects or programmes, and monitoring and reporting mechanism for the projects or programmes and details of need & impact assessment, if any, for the projects undertaken by the Company.

The Board of the Company or its CSR Committee shall formulate an Annual Action Plan in pursuance of this CSR policy, which shall include the following, namely:

(i) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act.

(ii) the manner of execution of such projects or programmes as specified in sub-rule (1) of Rule 4.

(iii) the modalities of utilisation of funds and implementation schedules for the projects or programmes.

(iv) monitoring and reporting mechanism for the projects or programmes; and

(v) details of need and impact assessment, if any, for the projects undertaken by the company. The Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

#### **7. ROLE OF THE CSR COMMITTEE WITH RESPECT TO UNDERTAKING THE CSR ACTIVITIES**

The CSR Committee of the Company shall:

(i) formulate / make changes from time to time and recommend to the Board for its approval, a CSR Policy which shall indicate the activities to be undertaken by the Company in areas or subject, specified in Schedule VII to the Act.

(ii) recommend the amount of expenditure to be incurred on the CSR activities to be undertaken by the Company.

(iii) monitor the CSR Policy of the Company from time to time.

(iv) formulate and recommend to the Board for its approval, an Annual Action Plan in pursuance of this CSR policy; and

(v) make recommendation to the Board for alteration of Annual Action Plan if required at any time during the financial year based on reasonable justification.

#### **8. ROLE OF THE BOARD WITH RESPECT TO UNDERTAKING THE CSR ACTIVITIES**

The Board of the Company shall:

i. constitute a CSR Committee of the Board, if applicable and required under the Act.

ii. disclose the composition of the CSR Committee in the Board's report, if any.

iii. approve the CSR Policy for the company and disclose contents of such Policy in its report and also place it on the company's website, if any.

iv. ensure that the activities as are included in CSR Policy of the company are undertaken by the Company.

v. ensure that the Company spends, in every financial year, at least two per cent of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this CSR Policy.

vi. if the Company fails to spend such amount as specified above, then in its report made under clause (o) of sub-section (3) of section 134 of the Act, specify the reasons for not spending the amount and, unless the unspent amount relates to any ongoing project referred to in sub-section (6) of section 135 of the Act, transfer such unspent amount to a Fund specified in Schedule VII to the Act, within a period of six months of the expiry of the financial year.

vii. if any amount remaining unspent under sub-section (5) of section 135 pursuant to any ongoing project, transfer within a period of thirty days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall 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 shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

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