



KEC SPUR INFRASTRUCTURE PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

INTRODUCTION

KEC Spur Infrastructure Private Limited (formerly known as 'Spur Infrastructure Private Limited') is committed to improve the lives of the society in which it operates. The Company believes in “looking beyond business” and strives to create a positive impact on the communities it serves and on the environment. The Company is committed not just to profits, but also towards leaving a deeper imprint on the society as a whole. We understand that there is a need to strike a balance between the overall objectives of achieving corporate excellence vis-à-vis the company’s responsibilities towards the community.

OBJECTIVE

The objective of the policy is to actively contribute to the social, environmental and economic development of the society in which we operate.

CSR COMMITTEE

The Board of Directors will discharge the functions of the CSR Committee till the amount required to be spent by the Company does not exceed Rs. 50 lakh.

CSR ACTIVITIES

The scope of the CSR activities of the Company will cover the activities as covered under Section 135 of the Companies Act, 2013, and may include the following areas but not limited to the same and may extend to other specific projects/programs as permitted under the law from time to time.

- 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.

- 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

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

CSR IMPLEMENTATION

The Board of Directors will be responsible for the following:

- a. Formulate CSR Policy
- b. Review CSR Policy from time to time
- c. Give strategic direction to the CSR initiatives
- d. Formulate an Annual Action Plan for the CSR activities to be undertaken with the execution modalities, implementation schedules etc.
- e. Recommend the amount of expenditure to be incurred on various CSR activities
- f. Monitor the progress on various chosen projects for CSR activities

The Company's CSR initiatives/activities shall be implemented directly and / or through the RPG Foundation for the purposes of accessing expertise/enhancing resources and for support in project implementation. RPG Foundation is registered with Ministry of Corporate Affairs with registration number as CSR000000030 and also under Section-12A and 80G of Income Tax Act, 1961.

CSR SPEND/ SOURCES OF FUNDING

The Board of Directors of the Company shall endeavor to spend atleast 2% of the average net profit during the preceding 3 financial years on CSR activities as enumerated above.

Any surplus arising out of the contribution made for CSR Activities shall not form part of the business profit of the Company and redeployed for such activities.

EXCLUSION FROM CSR

The following activity shall not form part of the CSR activities of the Company: -

- The activities undertaken in pursuance of normal course of business of a company.
- CSR projects/programs or activities that benefit only the employees of the Company and their families.
- Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
- Any CSR projects/programs or activities undertaken outside India.



MONITORING & REPORTING

The Board of the Company will discharge the functions of the CSR Committee i.e. monitor CSR activities, till such time the Company is required to form a CSR Committee mandatorily by law.

The Board of Directors shall review the implementation of CSR as and when required.

OUR IMPLEMENTATION PARTNER

RPG Foundation is a Public Charitable Trust registered under the Bombay Public Trust Act 1950, created to function as a centralized body for implementing CSR activities of the various companies of the RPG Group of Companies.

RPG Foundation will work as the core implementation partner for the Company and will create cross-company/NGO synergies to encourage exchange of CSR ideas, best practices and learning.

The Company also encourages building other partnerships as required with Government Organizations (GOs), Non-Government organizations (NGOs), CSR departments of various companies and Private entities like local Municipal Corporation, other local government bodies, etc. to build sustainable impact and reach out to a large and varied section of the society.

AMENDMENT OF POLICY

The Board of Directors may amend this Policy, inter-alia, upon recommendation of the CSR Committee, if any. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail notwithstanding the provisions hereunder, from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

GUIDING PRINCIPLES UNDER CSR POLICY

Guiding principles for selection of CSR activities and implementation and monitoring of CSR activities are enclosed as an Annexure to this Policy.

ANNEXURE
GUIDING PRINCIPLES UNDER CSR POLICY

I. Guiding principle for selection of activities

The CSR Activities for the Company are carried out either directly by the Company or by RPG Foundation (RPGF), Implementing Partner and following guiding principles for selection of CSR activities shall be followed: -

1. **Activity:** CSR activities permitted in Schedule VII of the Companies Act, 2013 as may be amended from time to time, only should be undertaken in close coordination with RPGF and CSR Committee, if any.
2. **Location:** Preference should be given to the local areas in India where the Company operates, to the extent reasonably possible.
3. **Benefits:** Priority should be given to projects which will bring long term, sustainable and lasting benefits to the community. Emphasis to be given on long term viability of activities which have the potential of remaining viable even upon disengagement at the end of the project period.
4. **Budget allocation:** Company shall spend, minimum two percent (2%) of the average net profits made during the three immediately preceding financial years, for CSR activities. The spend on any identified activity should be decided on the need assessment either undertaken by the Company or RPFG.

II. Guiding principle for implementation and monitoring of activities

1. Once the CSR projects or programs are identified and finalized, RGPF should make a schedule for implementation along with milestone thereof. Unless it is an Ongoing project, the entire CSR activities should be fully implemented before the close of the financial year.
2. For Ongoing project, year wise budget would be allocated and milestones of completion should be defined and adhered to.
3. As far as possible every effort should be made to ensure that approved CSR activities are implemented in line with the implementation schedule(s) which forms part of the Annual Action Plan.
4. For monitoring, RPFG implementing the projects or programs shall place reports/update(s) periodically.
5. Company shall review its average CSR obligation to ascertain the applicability of the impact assessment, if any, through an independent agency, of CSR projects. In such cases, the impact assessment reports should be placed before the Board and shall be annexed to the annual report on CSR, if required.
6. The Guiding principles set out hereunder are indicative and not exhaustive and the Board is permitted to carry out such changes herein, as deemed fit and expedient, from time to time.