



**SINTERCOM**  
India Ltd.

**CORPORATE SOCIAL RESPONSIBILITY POLICY**

This policy has been instituted based on the Corporate Social Responsibility (CSR) provisions of Section 135 of the Companies Act, 2013 read with Schedule VII of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2013. This policy will at all times be subject to the provisions of the aforesaid act and rules (as amended from time to time). This Policy will come into force with effect from 29th November, 2017.

## **CSR COMMITTEE:**

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The objective of the Policy is to determine materiality of events or information of the Company and disclosure of events or information to Stock Exchanges in compliance with the SEBI Listing Regulations and to ensure good corporate governance.

### CSR Committee comprises of Three Board of Directors of the Company

1. Ms. Preeti Ramdasi - Chairman
2. Mr. Jignesh Raval- Member
3. Mr. Hari Nair- Member
4. Mr. Harald Neubert- Member

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## **CSR PROJECTS AND PROGRAMMES**

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The Company shall undertake specific corporate social responsibility (“CSR”) projects and programmes, as approved from time to time by the Board in its capacity as the CSR Committee of the Company, within the following CSR categories:

- i) Eradicating hunger, poverty and malnutrition promoting healthcare 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 arts and handicrafts;
- vi) Measures for the benefit of armed forces veterans, war widows and their dependents;
- vii) Training to promote rural sports, nationally recognized 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 classes, 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;

All CSR projects and programmes shall be carried out only in India.

No specific CSR projects or programmes shall be undertaken in pursuance of normal course of business of the Company.

In furtherance of specific CSR projects or programmes, the Company may collaborate with NGO's and other like-minded stakeholders, including other companies, registered trusts and societies, in order to leverage upon the collective expertise, wisdom and experience that such relationships may bring.

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## **BUDGET**

In accordance with CSR Requirements, the Company shall seek to spend annually 2 per cent of the average net profits of the Company, made during the three immediately preceding financial years, on specific CSR projects and programmes.

The Company shall take steps to ensure that any surplus arising out of the Company's CSR projects and programmes or activities shall be set aside for later use in CSR projects and programmes and in no event shall form part of the Company's business profits.

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## **OUR APPROACH TO IMPLEMENTATION AND MECHANISM**

Whilst a large part of the CSR efforts of Sintercom will be implemented by an in-house CSR team of employees, the company will also partner with credible organizations - individually or as a consortium - to design, fund, implement and review projects. Partner agencies will be selected based on well-defined selection criteria.

Two authorised members of the CSR team will submit the following reports to the CSR Committee on event and quarterly basis:

1. Selection Report;
2. CSR Spending Report; (event basis and quarterly);
3. Further Plans;
4. In respect of activities undertaken through outside Trust/Society/NGO's etc. there will be mechanism of monthly reporting of progress on each such activities and the amount incurred thereon;
5. Progress Report (Quarterly Basis)

After the approval from the Committee the CSR team can process for their further action.

The Company may, in every financial year, spend such amounts on its CSR activities as the CSR Committee may authorise from time to time subject to the limits as approved by the Board of Directors.

Any surplus arising out of CSR projects, programs and activities shall not form part of the business profits of the Company.

To measure the impact of the work done, a social satisfaction survey / audit is carried out by a legal and finance team of the Company.

CSR Committee and CSR team shall ensure that a transparent monitoring mechanism is put in place.

*Without prejudice to the generality of the contents of this policy, the Company may undertake CSR projects, programs and activities as permitted under the framework of Companies Act, 2013 from time to time (including any amendments, clarifications, circulars, notifications or other official communications from time to time). The Company may also carry out the purposes of this CSR policy in accordance with any amended position of law from time to time notwithstanding that such amended position is not reflected in this policy.*

FOR AND ON BEHALF OF  
SINTERCOM INDIA LIMITED

**SINTERCOM INDIA LIMITED**

**JIGNESH RAVAL**

Managing Director