



Department of Human Resource & Training

Subject : CSR Policy		Policy No : 80	
Prepared by : Head – H R & Admn	Approved by : BOD	Effective Date 11.04.2014	Version 1

Objective and Purpose

The key purpose of this Policy is to:

- Outline the development areas in which the Company shall get involved in.
- Define governance structure for CSR management within the Company.
- Serve as a guiding document aiding in identification, execution and monitoring the CSR projects.
- Describe the treatment of surpluses from CSR activities.

Alignment with Synthite Values

We believe to drive our CSR policy with the same values which directs Synthite. Hence, this CSR Policy absorbs Synthite's core values and is aligned in the following manner to its CSR strategy:

- Being Accountable for what we do: Synthite considers itself accountable for contributing back in a meaningful way to the society/ Nation.
- Embrace Diversity: Synthite believes in embracing diverse views and opinions which lead to a better solution. Accordingly, for execution of its CSR objectives Synthite plans to partner, where necessary, with NGOs/ other charitable organizations to meet the CSR objectives.
- Collaborate to Win: Collaborating with other NGOs/ charitable organizations, with footprint/ expertise in areas selected, is a key aspect of Synthite's strategy to make a positive impact in its CSR activities.

Applicability

CSR Policy is applicable to the Company and its Indian subsidiaries (collectively referred to as "Synthite") which are mandated with the CSR expenditure obligations as per Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

Scope of CSR Policy

This Policy applies to all CSR projects that will be undertaken by Synthite and shall fulfil all the requirements of Section 135 of the Companies Act, 2013. Synthite shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act, 2013. This Policy will be periodically reviewed and updated in line with the relevant codes of legislation and best practices that can be adopted by Synthite.

Areas to Emphasize

Synthite has broadly selected four areas of focus under its CSR activities, as under:



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Education:

- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.

Environment Sustainability:

- 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;

Medical and other Welfare

- Providing medical relief and rehabilitation to communities who either don't have access to quality health care or cannot afford it;
- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- 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;
- Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- Contribution to the Prime Minister's National Relief Fund or Chief Ministers Relief Fund and any other fund set up by the Central / State Government for socio-economic development and relief and welfare communitives
- Contributions or funds provided to technology incubators located within academic
- Rural development projects;

Emergencies and Natural Calamities

- Synthite shall provide relief, support, rehabilitation etc. in case of natural calamities or emergencies.

Governance Structure:

A governance structure at Synthite is responsible for implementing and administering CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013. The CSR Committee of the Board of Directors of the Company is ultimately accountable for the CSR projects undertaken by Synthite.

Synthite has constituted a CSR Committee at the Board level. The CSR Committee is supported by the CSR Team, comprised of representatives from different sections.

CSR Team:

Dedicated CSR team shall be responsible for implementing the CSR Policy and shall work under the guidance of CSR Committee and will be mainly responsible for:

- Execution of CSR Policy.
- Identify projects and key initiatives pursuant to CSR Policy.



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- Facilitating allocation of funds to the projects as identified for CSR activities.
- Monitoring CSR Projects to establish effectiveness of CSR efforts and appraise the same to CSR Committee.
- Compilation of information & preparation of Annual Reports on CSR activities and presenting the same to CSR Committee.
- Any other activity necessary to ensure achievement of CSR objectives.

CSR Budget

The total budget for the CSR projects in each financial year will be decided by the CSR Committee in accordance with applicable provisions of the Act and the CSR Rules. The CSR Committee shall propose to distribute the budget among the Areas to Emphasize or such of them as the CSR Committee may deem fit in each financial year, in such proportion and in a manner that meets the objectives of the CSR Policy.

For any reason if the CSR team is not able to follow the allocation agreed on in any of the Areas to Emphasize described above, the same shall be utilized in such other Areas to Emphasize as the CSR team may recommend with the reasons therefor, and the CSR Committee may approve.

Monitoring

The CSR Team will monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports etc. Mechanisms to track data and monitor projects will be established to ensure the transparency and efficiency of the implementation process. The projects will be evaluated against the milestones defined in the implementation plan of the project.

Reporting

The CSR Committee of the Board, based on reports presented by the CSR Team, will annually publish report on the CSR projects.

= End of policy =