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Corporate Social  
Responsibility &  
Sustainability





## A Journey of Commitments

As we pursue our business objectives, Kram Infracon Private Limited remains committed to being a responsible corporate citizen, aiming to maximize social impact. Embracing the concept of Corporate Social Responsibility (CSR), we recognize its significance not only ethically but also as a statutory requirement post the enactment of the Companies Act, 2013.

In line with legal mandates, our Corporate Social Responsibility Committee (CSR Committee) was established during a Board Meeting on 8th August 2019. This committee was entrusted with formulating a CSR Policy, aligning with Section 135 of the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014.

After diligent formulation, the CSR Committee presented this Corporate Social Responsibility Policy for approval during a Board meeting on 17th October 2019. The Board promptly approved and adopted this policy with immediate effect.

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**Our commitment to CSR is a dynamic journey, and this policy is subject to periodic amendments in accordance with our CSR goals and the prevailing provisions of the Act.**



## 1.1 CSR Vision

We, Kram Infracon Private Limited, strongly believe in the concept of a better quality of life for everyone, now and for generations to come, whilst achieving a stable economic growth. Our vision is a world in which we contribute to provide basic requirements of people such as education, health care, sanitation etc. in an environmentally, socially and economically sustainable way. We believe, as a responsible corporate citizen, it is our duty to ensure that the benefits of our growth are not just shared by the stakeholders of our organisation but also by the local communities in which we operate.

## 1.2 Objectives of the Policy

This Policy shall be read in line with Section 135 of the Act, read with Rules and such regulations, circulars, and notifications (collectively referred hereinafter as 'Regulations') as may be applicable and as amended from time to time and will, inter-alia, provide for the following:

- Commitment to continue work for social good through activities conducted to enhance social benefit.
- Establishing guidelines for compliance with the provisions of Regulations, to dedicate a percentage of Company's profits for social projects.
- Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.



## 1.3 Definitions

In this policy:

- (a) 'Act' refers to the Companies Act, 2013, including any modifications or amendments.
- (b) 'Corporate Social Responsibility' aligns with the definition in Section 135 of the Act and the CSR Rules.
- (c) 'Ministry' pertains to the Ministry of Corporate Affairs.
- (d) 'Net Profit' is as defined in Section 135 of the Act and CSR Rules.
- (e) 'CSR Committee' represents the Committee of the Board of Directors, as constituted by the Board in adherence to Section 135 of the Act and CSR Rules.
- (f) Words and expressions used in this CSR Policy, not explicitly defined herein but defined in the Act, shall carry the meanings respectively ascribed to them in the Act/rules made thereunder.

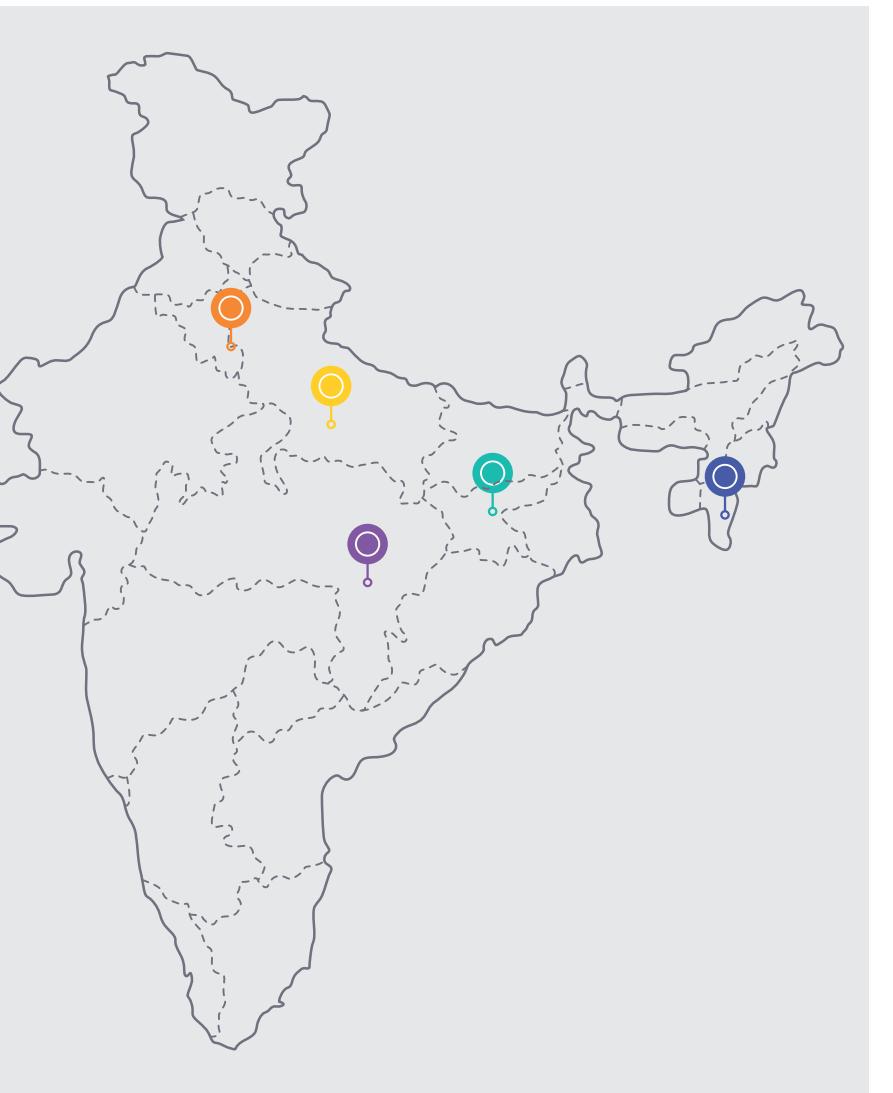
## 1.5 Annual Spends/ Allocation of Funds

In adherence to Section 198 of the Act and CSR Rules, the Company commits to allocate not less than 2% of the average Net Profits over the preceding three financial years for CSR initiatives.

The Company may invest in enhancing the CSR capacities of its personnel or implementing agencies, but such expenditure will not exceed five percent of the total CSR expenditure in a financial year. Any surplus generated from CSR projects or activities will not be considered part of the Company's business profit.

## 1.4 The Geographic Reach

Our CSR activities primarily focus on the National Capital Region, Uttar Pradesh, Madhya Pradesh, Jharkhand, Mizoram, and other states where the Company operates. The CSR Committee holds the authority to identify additional locations, beyond those mentioned, and propose them to the Board for approval.



## 1.6 Meetings of the Committee

To ensure the Committee's effective operation, members will convene as follows:

- a. Meetings will be held as necessary, complying with legal requirements and Board stipulations. The members may agree with the timing and location decided mutually by committee members.
- b. A quorum for CSR Committee Meetings will consist of one-third of its total strength (any fraction rounded off as one) or two members, whichever is higher.

### CSR Activities under the Act:

Recognizing that Corporate Social Responsibility (CSR) extends beyond mere compliance, our policy signifies a commitment to work for social good. Activities will align with the following focus areas outlined in Section 135 of the Companies Act, 2013, and CSR Rules:

- i. Eradicating hunger, poverty, and malnutrition; promoting healthcare including preventive healthcare, and sanitation, including contributions to the Swachh Bharat Kosh for sanitation and ensuring 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, establishing homes and hostels for women & orphans, old age homes, day care centres, and facilities for senior citizens; addressing 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, works of art, public libraries, and the promotion 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 recognized sports, Paralympic sports, and Olympic sports.
- viii. Contributions to the Prime Minister's National Relief Fund or other funds for socio-economic development, relief, and welfare of scheduled castes, tribes, other backward classes, minorities, and women.
- ix. Contributions to incubators funded by the Central Government or State Government, public-funded universities, Indian Institutes of Technology (IITs), national laboratories, and autonomous bodies engaged in 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;



## Planning, Implementation & Monitoring

Once the activities are approved by the CSR Committee, the Board may choose to execute the activities itself or through designated trusts, societies, or companies as specified in the Act. To maximize social impact, the CSR Committee may designate a Nodal Agency to oversee the implementation of CSR activities. The Nodal Agency will handle activity selection, maintain separate accounts, receive and deposit contributions, provide regular progress updates, undergo audits, and submit comprehensive reports to the CSR Committee.

## Reporting in Annual Report

The Annual Report on CSR activities will be incorporated into the Board's Report, adhering to the formats outlined in the Act. The Company's CSR Policy and a report on its CSR activities will be made available on the Company's website.

In cases where the required amount is not spent on CSR activities, the Board will specify the reasons in its report under Section 134(3)(o) of the Act.

Unspent amounts from ongoing projects will be transferred to a special Unspent Corporate Social Responsibility Account within 30 days from the end of the financial year. The Company is obligated to utilize this amount in alignment with its CSR Policy within three financial years, or transfer it to a specified fund in Schedule VII.

As approved in the meeting dated 17th October 2019,

## CSR Initiatives for F.Y. 2023-2024

### Rural Development Projects



Our commitment to Corporate Social Responsibility extends to rural development projects that aim to uplift and empower rural communities. We believe in fostering sustainable growth by investing in initiatives that address the unique challenges faced by rural areas. These projects may include infrastructure development, access to education and healthcare, promoting sustainable agriculture practices, and creating avenues for skill development and employment. By actively participating in rural development, we aspire to contribute to the overall well-being and prosperity of these communities.

### Slum Area Development:

In line with our dedication to social responsibility, we actively engage in slum area development projects. Recognizing the specific needs of marginalized urban populations, we focus on initiatives that enhance living conditions, provide access to basic amenities, and promote community well-being. Our efforts may encompass infrastructure improvements, healthcare accessibility, education programs, and skill development initiatives tailored to uplift the residents of slum areas. Through these projects, we aim to create positive and lasting impacts, fostering a sense of dignity and empowerment within slum communities.

### Disaster Management, including relief, rehabilitation, and reconstruction activities

Our CSR initiatives extend to disaster management, encompassing relief, rehabilitation, and reconstruction activities. Recognizing the profound impact of natural or man-made disasters on communities, we are committed to supporting those affected. Our efforts may involve immediate relief measures, long-term rehabilitation projects, and sustainable reconstruction activities. By actively participating in disaster management, we aim to contribute to the resilience and recovery of communities facing adversity.

CSR activities are undertaken as distinct projects, programs, or activities, excluding those conducted in the normal course of business. The Company may decide, based on the recommendations of the CSR Committee, to initiate new or continue ongoing projects in India.



## CSR Composition



Navin Kumar Mittal  
Whole Time Director



Avadhesh Chandra Shrivastava  
Director

