

SCOPE AND OBJECTIVE OF THIS POLICY

BACKGROUND

In compliance with the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, the Company is, inter alia, required to spend, in every financial year, at least two per cent of the average Net Profits before Tax (PBT) of the Company, made during the three immediately preceding financial years, in pursuance of its CSR Policy.

PHILOSOPHY

Corporate Social Responsibility (CSR) is a public spirited cause that has been well introduced by the new Companies Act 2013. Through the CSR there is a formation of a dynamic relationship between a company on one hand and the society and environment on the other. CSR is traditionally driven by a moral obligation and philanthropic spirit which resonates with the policy of the Company.

FOCUS AREAS

The main responsibilities of the Company towards society at large are to eradicate hunger and education of girl child. Brindavan Hydropower Private Limited is committed to operate and grow its business in a socially responsible way with a vision to be an environmental friendly corporate citizen. Our passion in these activities make us more responsible year after year. As a responsible corporate citizen, we try to contribute for possible social, educational and environmental causes on a regular basis. We firmly believe that to succeed, an organisation must maintain highest standards of corporate behaviour towards its investors, stakeholders, employees and societies in which it operates.

FORMULATION OF CSR POLICY

Formulation of a Corporate Social Responsibility Policy has become mandatory under the Companies Act, 2013. Accordingly, our Company has formulated this CSR Policy which encompasses its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs.

In terms of section 135 of the Companies Act, 2013 and the Rules made thereunder, Board of Directors of the Company at its meeting held on 26th August, 2021 formulated a CSR policy. Since constitution of CSR committee is mandatory only if obligation of CSR amount exceeds 50 lakhs, no Committee is formed and the functions of such Committee will be undertaken by the Board comprising of following members:

SI No.	Name	Designation
1	Mr. K R Pradeep	Director
2.	Mr. Raghuraj Gujjar	Managing Director
3.	Mr. Ajit Setu Ram	Whole-Time Director

The terms of reference of the Board shall include the following:

- a) To frame a CSR Policy, which shall indicate the activities to be undertaken by the Company towards corporate social responsibilities.
- b) The following activities shall be included as part of the CSR activities:
 - Work actively in areas of preventive health and sanitation, education, skills for employability, livelihoods and income generation, waste resource management and water conservation for host communities for enhancing Human Development Index.
 - Work actively in areas of eradication of hunger and poverty, provide opportunity and financial assistance for the promotion of education, provide medical aid to the needy and down trodden.
 - Collaborate with likeminded bodies like governments, voluntary organizations and academic institutes in pursuit of our goals.
 - Interact regularly with stakeholders, review and publicly report our CSR initiatives.
- c) To spend an amount to be incurred on the activities specified.
- d) To establish a monitoring mechanism so as to monitor the progress of the CSR activities. This will include recording the various details of the CSR activities and preparation of a report on the same. The details to be incorporated in the Report on CSR activities, which shall subsequently be disclosed in the Board Report, shall be as per the format prescribed in Annexure 1 hereto.
- e) To ensure a constant flow of CSR initiatives, which shall, in-turn, avoid carry forward of funds allocated for each CSR initiative.
- f) To formalise an operational and organisational structure of each CSR activity.

FUNDING AND IMPLEMENTATION

- a) Pursuant to the provisions of the Act, 2% of the average net profit of an eligible company for the last 3 financial years needs to be allocated towards CSR activities. From the annual CSR Budget, provision will be made towards the CSR activities on a year-on-year basis.
- b) The Company will ensure monitoring, coordination and supervision of the agency, if any, entrusted with the responsibility for implementation of the project. For efficient and effective execution of the project, the Board shall be required to get the schedules prepared - Schedule-I (List of activities linked with timelines) & Schedule-II (Payments linked with milestones) which shall form an integral part of the agreement to be signed with the implementing agency.
- c) All approved CSR projects are to be implemented in accordance with the timeline prescribed by the Board.
- d) For implementation of in-house projects, the company's pertinent policies related to works and purchases are to be followed in general.

OPERATIONAL FRAMEWORK

The Act envisages a “CSR Foundation” for CSR initiatives. The Board of a company is empowered to decide to undertake CSR activities, through a registered trust or a registered society or a company established by the company or its holding or subsidiary or associate company.

MONITORING AND REPORTING

The following instructions are to be followed for monitoring and implementation of CSR activities:

- Monitoring of CSR projects are absolutely essential.
- For all CSR projects / activities, close Supervision & Monitoring have to be done by the Board.
- With a view to derive the optimum mileage/visibility of the various CSR endeavors, appropriate and adequate measures shall be taken using all existent communication tools/media to project the company’s contributions.

[Annexure -II]

Format for the Annual Report on CSR Activities to be Included in the Board's Report For Financial Year Commencing on or After 1st Day of April, 2020

1. Brief outline on CSR Policy of the Company.
2. Composition of CSR Committee:
3. Provide the web-link where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company.
4. Provide the details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social responsibility Policy) Rules, 2014, if applicable (attach the report).
5. Details of the amount available for set off in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social responsibility Policy) Rules, 2014 and amount required for set off for the financial year, if any

SI. No.	Financial Year	Amount available for set-off from preceding financial years (in Rs)	Amount required to be set-off for the financial year, if any (in Rs)
1			
2			
3			
	Total		

6. Average net profit of the company as per section 135(5).
7. (a) Two percent of average net profit of the company as per section 135(5).
 - (b) Surplus arising out of the CSR projects or programmes or activities of the previous financial years.
 - (c) Amount required to be set off for the financial year, if any:
 - (d) Total CSR obligation for the financial year (7a+7b-7c).
8. (a) CSR amount spent or unspent for the financial year:

Total Amount Spent for the Financial Year. (in Rs.)	Amount Unspent (in Rs.)				
	Total Amount transferred to Unspent CSR Account as per section 135(6).		Amount transferred to any fund specified under Schedule VII as per second proviso to section 135(5).		
	Amount.	Date of transfer.	Name of the Fund	Amount.	Date of transfer.

- (b) Details of CSR amount spent against ongoing projects for the financial year:

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
SI. No.	Name of the Project.	Item from the list of activities	Local area (Yes/No).	Location of the project.	Project duration.	Amount allocated for the	Amount spent in the current	Amount transferred to Unspent CSR	Mode of Implementation - Direct (Yes/No).	Mode of Implementation - Through Implementing Agency

		es in Schedule VII to the Act.		State.	Distri ct.		project (in Rs.).	t financial Year (in Rs.).	Account for the project as per Section 135(6) (in Rs.).		Na me	CSR Registrati on number.
1.												
2.												
3.												
	Total											

(c) Details of CSR amount spent against **other than ongoing projects** for the financial year:

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	
Sl. No.	Name of the Project	Item from the list of activities in schedule VII to the Act.	Local area (Yes/ No).	Location of the project.		Amount spent for the project (in Rs.).	Mode of implementation - Direct (Yes/No).	Mode of implementation - Through implementing agency.	
				State.	District.			Name.	CSR registration number.
1.	-	-	-	-	-	-	-	-	-
2.									
3.									
	Total								

(d) Amount spent in Administrative Overheads

(e) Amount spent on Impact Assessment, if applicable:

(f) Total amount spent for the Financial Year (8b+8c+8d+8e):

(g) Excess amount for set off, if any

Sl. No.	Particular	Amount (in Rs.)
(i)	Two percent of average net profit of the company as per section 135(5)	
(ii)	Total amount spent for the Financial Year	
(iii)	Excess amount spent for the financial year [(ii)-(i)]	
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any	
(v)	Amount available for set off in succeeding financial years [(iii)-(iv)]	

9. (a) Details of Unspent CSR amount for the preceding three financial years:

Sl. No.	Preceding Financial Year.	Amount transferred to Unspent CSR Account	Amount spent in the reporting	Amount transferred to any fund specified under Schedule VII as per section 135(6), if any.	Amount remaining to be spent in

		under section 135 (6) (in Rs.)	Financial Year (in Rs.).	Name of the Fund	Amount (in Rs.)	Date of transfer.	succeeding financial years. (in Rs.)
1.							
2.							
3.							
	Total						

(b) Details of CSR amount spent in the financial year for ongoing projects of the preceding financial year(s):

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Sl. No.	Project ID.	Name of the Project.	Financial Year in which the project was commenced.	Project duration.	Total amount allocated for the project (in Rs.).	Amount spent on the project in the reporting Financial Year (in Rs.).	Cumulative amount spent at the end of reporting Financial Year. (in Rs.)	Status of the project - Completed /Ongoing.
1								
2								
3								
	Total							

10. In case of creation or acquisition of capital asset, furnish the details relating to the asset so created or acquired through CSR spent in the financial year

(asset-wise details).

(a) Date of creation or acquisition of the capital asset(s).

(b) Amount of CSR spent for creation or acquisition of capital asset.

(c) Details of the entity or public authority or beneficiary under whose name such capital asset is registered, their address etc.

(d) Provide details of the capital asset(s) created or acquired (including complete address and location of the capital asset).

11. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5). –

For Brindavan Hydropower Private Limited

Sd/-
Raghuraj Gujjar
Managing Director
DIN: 02734451