



Konstelec Engineers Limited

CONSULTING ENGINEERS & EPC CONTRACTORS

CIN: U45203MH1995PLC095011

Policy guidelines for Corporate Social Responsibility

Approved and adopted vide Board resolution dated: 20/10/2023



Policy guidelines for Corporate Social Responsibility:

Philosophy	As a responsible Corporate citizen and its part of its endeavour towards the development of society and community at large, Konstelec Engineers Limited recognizes the significance of the philosophy and the concept of CSR, which will add value to the operations and contribute towards the long term sustainability of the business and eventually, enhance the interest of the stakeholders and the society.
Objective	<p>In pursuing the philosophy aforesaid, Konstelec Engineers Limited will put efforts to make contribution towards society and nature.</p> <p>This will enable Konstelec Engineers Limited Company to promote</p> <ul style="list-style-type: none">• Public purposes• Social Responsibilities• General charities• Development of community and society at large• Maintenance of Eco- Friendly and harmonious environment• Education and health purpose of the Society
Preference Areas	The CSR initiatives, by the Company shall give preference to the local areas (Mumbai) where the registered office of the company is situated or the nearby rural area.
What is not CSR	<p>CSR activities will not, however, include the following:</p> <p>Activities undertaken in pursuance of Company's normal course of business;</p> <p>Activities which benefit only the employees of the Company and their families;</p> <p>Contribution directly or indirectly to any political parties;</p> <p>Activities undertaken outside the country;</p>
Sanctioning Authority	<p>CSR committee would be authorized for sanctioning amount for any specific activity within the overall Ceiling Limit and/or to delegate authority from time to time to Directors of the company.</p> <p>To allocate amount for any such specific activity within the overall Ceiling limit.</p>
Ceiling Limit	For each financial year, 2% of the average net profits (as defined under the Companies Act, 2013 and the applicable rules there under) made during three immediately preceding financial years or such higher amount as may be resolved by the Board of Directors/ CSR committee /Competent



	<p>Authorities, as applicable.</p> <p>In case of no such profit in any financial year, CSR activities may be carried out in that year in terms of the approval accorded by the Board of Directors/ CSR committee/ Competent Authorities, as applicable.</p>
CSR Committee	<p>CSR Committee, consisting of following Members: (Minimum -3 Directors with at least one Independent Director)</p> <ol style="list-style-type: none">1. Biharilal Shah – Chairman cum Managing Director2. Amish Shah-Whole Time Director3. Manisha Lalan- Non Executive Independent Woman Director
Implementation Authority/ Monitoring Authority/ Implementation Procedure	<p>The modalities for execution of the CSR activities/ projects/ programs, implementation schedule/ monitoring process of projects/ programs shall be prescribed by CSR Committee from time to time.</p> <p>a) <u>The CSR Committee shall meet at least once in a year to discuss and review the CSR activities and policy.</u></p> <p>b) <u>Duties and Responsibilities of CSR Committee:</u> The CSR Committee constituted in pursuance of Section 135 of the Companies Act, 2013 shall be required to carry out the following activities:</p> <ul style="list-style-type: none">• To formulate and recommend to the Board, a CSR policy;• To review and recommend the amount of expenditure to be incurred on the activities to be undertaken for approval of the Board;• To monitor the CSR policy and the CSR activity and report to the Board from time to time;• Review the various proposals and identify the eligible entities/agencies for allocation of CSR amount;• Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules;• Monitor and review periodically the CSR activities and submit the reports to the Board in respect of the CSR activities undertaken by the Company. <p>c) <u>CSR medium / Operation:</u></p> <p>i) CSR activities will be undertaken directly or through a registered trust or a registered society/agencies or a company established by the Company or its holding or</p>



	<p>subsidiary or associate company under Section 8 of the Companies Act, 2013.</p> <p>ii) If any donation/contribution is to be given to any other entity for CSR activity, preference will be given to such entities/Trust having track record in undertaking similar programs or projects.</p> <p>iii) Further, in such a case, the Company will specify the project or programme to be undertaken through these entities, the modalities of utilization of funds on such projects or programs and the monitoring and reporting mechanism.</p> <p>iv) The Company may also collaborate with other companies for undertaking projects or programs in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programs in accordance with the prescribed CSR Rules.</p> <p>v) The entities that conduct social projects on behalf of the company or receive funds to realise programs must have knowledge and experience in the respective area, be transparent and integrity in their operations and have no other goal than the common good.</p> <p>vi) The Company may build CSR capacities of its own personnel as well as those of the implementing agencies through institutions with established track records, subject to the prescribed CSR rules.</p> <p>vii) Implementation will be done as per the requirement of the project or programme which is envisaged. Endeavour will be made to implement it over a year or so. However, as per the specific requirements of the activity, the schedule may be over a longer duration.</p> <p>viii) The CSR Cell may also work with any NGO's or institution to design and implement innovative projects independently or through partnership between institutions/trust.</p> <p>ix) The time period/duration over which a particular programme will be spread, will depend on its nature, extent of coverage and the intended impact of the programme.</p>
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	<p>x) The process for implementation of CSR programs will involve the identification of programs, area of CSR activities, project based approach, time period, cost of the project etc.</p> <p>xi) All proposals under CSR activity would be referred to the CSR Cell. After evaluation, CSR Cell may put forward the proposals of CSR along with their comments to CSR Committee.</p> <p>xii) The CSR Committee would recommend the proposal of CSR and the amount of expenditure to be incurred on the same to the Board for its approval.</p> <p>d) <u>Monitoring & Assessment:</u></p> <p>i) Release of funds for CSR Project/Program: The amounts sanctioned for a CSR project or programme, will be released in stages or instalments as per progress, as may be determined by the CSR Committee. CSR Committee may design the procedure/ guidelines applicable from time to time and release of funds to any project in a year shall be as per the guidelines finalized by the CSR Committee.</p> <p>ii) Review by the Board/CSR committee: On a quarterly basis, the Board of Directors and CSR Committee will review the implementation of CSR and financial reports (controlling of funds).</p> <p>iii) Utilization Certificate: Funds released/to be released to the implementing agency would be based on satisfactory utilization certificate duly certified by an authorized officer/CEO of the donee entity and satisfactory performance report submitted by the said person, as may be decided by the CSR Committee.</p> <p>iv) Audit: The amount spent on CSR by the Company will be subject to audit.</p> <p>v) Reporting in the Annual Report of the Company: CSR Policy and initiatives of the Company will be reported in the Annual Report of the Company in the manner prescribed under the CSR Rules. All the CSR and Sustainability projects would be documented and hosted on the Company website also.</p>
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To achieve the aforesaid objective, we shall work towards

Scope	Purpose	Activity	Events/Areas/ Modalities
Donation/ Contribution / Promotion /Facilitation	Contribution for public purpose	Promoting gender equality/ Reducing inequalities among different social groups etc.	Promoting gender equality and empowering women, setting up homes and hospitals/clinics/ dispensaries for women and orphans, setting up old age homes, day care center and such other facilities for senior citizens and measures for reducing inequalities faced by the socially and economically backward groups.
		Promoting utility services of mass use	Bus for mass transport, Shed at Bus Stop, etc. Street lighting, Beautification of parks etc.
		Protection/restoratio n of National heritage / promotion of Art and Culture etc.	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
	Contribution for Social purpose	Enhancement of Education/ knowledge /Academics/Skill/ Building/ Training	Sponsor under privileged and / or distressed students with brilliance for Higher studies or for training and provide Scholarship for those students with distinct brilliance
			Sponsor Educational institution/ Vocational Training Institutions promoting skill building activities/education / special



			<p>education for distressed people/children/women/elderly and the differently able and livelihood enhancement projects etc.</p> <p>Sponsor Conference/ Seminar of relevance</p> <p>Contributing to rural development projects.</p>
		Facilitating Sports & cultural activities	Sponsor Sports & Games of national, state level, regional, significance Para Olympic and Olympic sports
		Facilitating Health & hygiene initiatives/ eradicating hunger and poverty, etc.	<p>Support to Eye Camp, Pulse Polio campaign. Health Checkup& Blood Donation camp organized through relevant agencies/authorities, etc.</p> <p>Support Conference promoting awareness of Health & Hygiene</p> <p>Eradicating hunger & poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.</p>
		Facilitating Environment Protection & promoting Sustainable Development	Plantation & Forestation initiatives and/or other relevant identified programs/ projects including projects initiated by/ through relevant forums/ platforms etc for maintaining ecological balance, conservation of natural resources and maintaining quality of soil, air and water.



		Promotion of Road Safety	(i) (a) Promotions of Education, “Educating the Masses and Promotion of Road Safety awareness in all facets of road usage, (b) Drivers’ training, (c) Training to enforcement personnel, (d) Safety traffic engineering and awareness through print, audio and visual media” should be included. (ii) Social Business Projects: “Giving medical and Legal aid, treatment to road accident victims” should be included.
		Support to combat natural calamity	Victims of Flood, Earthquake, Cyclone, and other National Calamities.
		Measures for benefit of armed forces	Measures for benefit of armed forces veterans, war widows and their dependents.
		Promoting Rural Family Community	(a) Capacity building for farmers covering best sustainable farm management practices. (b) Training Agriculture Labour on skill Development (c) Doing our own research on the field for individual crops to find out the most cost optimum and Agri – ecological sustainable farm practices. (Applied research) with a focus



			on water management. (d) To do Product Life Cycle analysis from the soil conservation point of view.
		Promoting Education	Donations to IIMs/ IITs or other institutions for conservation of buildings and renovation of classrooms would qualify as “promoting education” and hence eligible for compliance of companies with Corporate Social Responsibility. b) Donations to schools/ colleges situated in rural areas for conservation of buildings and renovation of classrooms would qualify as “protection of national heritage, art and culture, including restoration of buildings and sites of historical importance” and hence eligible for compliance of companies with CSR.
		Donations for upliftment of under privileged area.	Through renowned/ prescribed organization(s) as may be contemplated/ indicated in the applicable regulations/ rules relating to CSR from time to time, having an established track record of at least three years in the related field.
		Donations for noble cause	Support to individual/ community/ section who achieved distinction at National level but now in distress.



	Contributions for charitable purpose		Medical amenities like Ambulance, x-ray machine or any such medical kits
		Disaster Relief	Disaster relief provided such as (i) Medical aid can be covered under 'promoting health care including preventive health care.' (ii) Food supply can be covered under eradicating hunger, poverty and malnutrition. (iii) supply of clean water can be covered under 'sanitation and making available safe drinking water' (iv) Trauma care around highways in case of road accidents.
		Contribution to Corpus of a Trust/Society/Section 8 Companies	Contribution to Corpus of a Trust/ society/ section 8 companies etc. as long as (a) the Trust/ society/ section 8 companies etc. is created exclusively for undertaking CSR activities or (b) Where the corpus is created exclusively for a purpose directly relatable to a subject covered in Schedule VII of the Act. 'Registered Trust' (as referred in Rule 4(2) of the Companies CSR Rules, 2014) .
			Contribution to the Prime Minister's National Relief Fund



			or any other and fund set up by the Central Government / State Government / Local Authorities for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities, and women.
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The Policy Guidelines of CSR activities entail the following basic principles and core elements and it is the intention of the company to pursue and preserve the same all through:

1. Care for all Stakeholders including interaction with all stakeholders. Sharing information relating to inherent risks and adopting countermeasures thereto.
2. Ethical functioning through promotion of transparency, good governance practices.
3. Respect for Workmen’s Rights and Welfare including development of effective grievance Redressal system, prevention of employment of child labour.
4. Respect for Human Rights.
5. Respect for Environment.
6. Activities for Social Development including education, skill building, health, cultural and social welfare particularly targeting at disadvantaged sections of society.

General Guidelines:

1. The above CSR programs and/ or activities are illustrative and not exhaustive. Further programs and/ or activities can be identified through review, evaluation and assessment by the CSR Committee from time to time. The CSR programs and /or the activities so selected /identified may be carried out by the Company through its officials, employees, representatives, any relevant forum/ platform/ organizations etc. as may be decided by the CSR Committee.
2. The Company may collaborate or pool resources with other companies to undertake CSR activities and any expenditure incurred on these collaborative efforts would qualify for computing statutory CSR spending.



3. The Company can also conduct its CSR activity through Trusts, Societies or Companies formed for charitable purposes, operating in India and having established track record of at least three years in carrying on activities in related areas.
4. Any of the Stakeholders can interact, communicate with/ the CSR Committee Members forwarding their recommendations/suggestions, for consideration by the CSR Committee.
5. Any Surplus arising out of CSR projects or programs or programs or activities shall not form part of the business profit of the Company.
6. The CSR policy as aforesaid may be modified /amended as may be required from time to time.

AMENDMENTS TO THE POLICY:

The CSR Policy referred to above is to be read in conjunction with Companies Act, 2013 and Companies (Corporate Social Responsibilities Policy) Rules, 2014. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from the Statutory Authority from time to time or as decided by the Board of Directors on its own and/or on the recommendation of CSR committee. The above Policy Guidelines are subject to review at suitable intervals and subject to revision accordingly.

For Konstelec Engineers Limited

Sd/-
Biharilal Ravilal Shah
Managing Director
DIN: 00337318

Sd/-
Amish Biharilal Shah
Whole Time Director
DIN: 01415766

Date: 20/10/2023
Place: Mumbai
