



**Symphony Limited**

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***Corporate Social Responsibility  
Policy***

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## I. PREAMBLE

Symphony Limited (together with its subsidiaries, the “Company” or “Symphony”) is committed to providing timely, orderly, sufficient, and reliable material information to shareholders, investors, analysts, media, and the financial markets (all referred to as the “Investment Community”) in a coherent manner. The purpose of this policy is to state the principles followed by the Company for engagement with the Investment Community, ensuring dissemination of accurate and timely communications to the Investment Community in compliance with the prevailing regulatory guidelines.

## II. SCOPE OF CSR POLICY

1. Eradicating hunger, poverty and malnutrition, 2[“promoting health care including preventive health care”] and sanitation 4[including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water.
2. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
3. promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
4. 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 4[including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga].
5. 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 art and handicrafts;
6. measures for the benefit of armed forces veterans, war widows and their dependents;
7. training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports
8. contribution to the prime minister's national relief fund 8[or Prime Minister’s Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
9. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organization (DRDO), 7[Department of Biotechnology (DBT)], Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in

science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).]

10. rural development projects]

11. slum area development.

Explanation - For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.]

12. disaster management, including relief, rehabilitation and reconstruction activities.]

13. Any other activities covered from time to time as may be covered by law.

### **III. IMPLEMENTATION**

In every financial year, the Board of Directors, upon recommendation of Corporate Social Responsibility Committee, shall spend at least 2% of the average net profits of the company made during the three immediately preceding financial years in any of the aforesaid activities.

The Board of Directors shall give preference to the local area and areas around it where it operates or has direct or indirect business presence, for spending amount on aforesaid activities.

In the event of company's non-spending the amount of CSR, the Board shall in its report made under clause (o) of sub section (3) of section 134, specify the reasons for not spending the amount.

The Company's CSR Projects shall be implemented either directly by the Company or through Company established under section 8 of the Companies Act or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, established by the Company or by any third party and having an established track record of at least three years or through any company established under section 8 of the Act or a registered trust or a society established by the Central or State Government, any entity established under an Act of Parliament or a State Legislature.

Every Company who intends to undertake any CSR Activity on behalf of the Company is required to register itself with the Central Government.

In such cases, the Company will specify the CSR Projects which may be undertaken by those Trusts in accordance with their Objects and administrative and accounting processes laid down in the respective Trust Deeds/ Memoranda and Articles of Association.

### **IV. MONITORING**

Corporate Social Responsibility Committee shall monitor Corporate Social Responsibility Policy of the company from time to time and it shall provide its report to the Board of Directors on annual basis.

## V. PROCEDURE

The CSR Committee shall formulate and recommend to the Board an annual action plan which shall include the following:

- i. List of CSR projects to be undertaken as specified in Schedule VII of the Companies Act and as per Guidelines/ directives issued by the Government from time to time.
- ii. Manner of execution of such projects
- iii. The modalities of utilisation of funds and implementation schedules for the projects
- iv. Monitoring and reporting mechanism for the projects
- v. Details of impact assessment if any

## VI. CSR SURPLUS

Surplus arising out of CSR projects or projects or activities shall not form part of the business profit of the Company.

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Revised w.e.f. April 27, 2021