# KREATE ENERGY (I) PRIVATE LIMITED CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

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#### 1. INTRODUCTION

Kreate Energy (I) Private Limited ("KEIPL" or "the Company") is a part of Kreate Group of Companies ("Kreate Group"). KEIPL is one of the top most company in Power and Commodity Trading in India. It's well-defined research and development team ensures that with their innovative solutions, KEIPL keeps the pace with the dynamic Power industry and can create value for its customers. It has helped significantly expand the trading activity in India. With its PAN India presence, vast client base, including 80% of state utilities and membership in both the Power Exchanges, it is able to meet the power requirement of its clients very efficiently and at competitive price.

Under section 135 of the Companies Act, 2013 ("Act") read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("CSR Rules"), as amended from time to time, every Company having net worth of Rs. 500 crore or more; or turnover of Rs. 1,000 crore or more; or net profit of Rs. 5 crore or more is required to constitute a Corporate Social Responsibility Committee ("CSR Committee"). The CSR Committee is required to formulate and recommend Corporate Social Responsibility Policy to the Board of Directors ("Board").

Accordingly, the Board of KEIPL has formed a CSR Committee. The CSR Committee so constituted has formulated a Policy on Corporate Social Responsibility ("CSR Policy") and recommended the same to the Board for its approval.

#### 1.1. OBJECTIVES OF THE POLICY

As a corporate entity, KEIPL acknowledges its obligation to contribute to the economic development of India and its various states while improving the quality of life of its workforce and their immediate families as well as of the community and society. While undertaking statutorily required CSR projects /

programs within India, KEIPL will consistently strive for opportunities to meet the expectation of its stakeholders by pursuing the concept of sustainable development. This Policy shall be read in line with Section 135 of the Act read with the CSR Rules, Schedule VII of the Act and such other rules, circulars, and notifications (collectively referred hereinafter as "CSR Rules") as may be applicable and as amended from time to time and will, inter-alia, include the following:

- a) CSR Commitments of KEIPL;
- b) Implementation schedule of CSR projects or programs;
- c) Modalities of execution of CSR projects or programs;
- d) Development of monitoring process of CSR projects or programs;
- e) Estimated expenditure on CSR projects or programs;
- f) Procedures and reporting mechanism for ensuring the implementation of CSR initiatives in letter and spirit.

# 1.2. CSR COMMITMENTS/FOCUS AREAS

In accordance with the requirements under CSR Rules,, the CSR activities of the Company, amongst others, will focus on the following areas:

S1.	Key Focus	Activities in Schedule VII of	Actions
No.	Area	the Act	
1	Education	Promoting Education	KEIPL's focus on
		including special education	education consist of
		and employment enhancing	following major parts:
		vocational skills especially	a. Promoting women's
		among children, women,	education including
		elderly and differently abled,	providing special
		and livelihood enhancement	education and
		projects;	vocational training to
			women belonging to
			socially and
			economically
			backward group of
			the society, which
			would promote
			upliftment of weaker
			sections of the society;
			b. Providing financial
			assistance including
			scholarship to the

			students of weaker sections of society with a view to encourage them to pursue primary as
			well as higher education; c. Promoting primary as well as higher
			education including setting up and supporting schools/colleges/universities;
2	Skill Development	Promoting Education including special education and employment enhancing vocational skills especially among children, women, elderly and differently abled, and livelihood enhancement projects;	KEIPL, through (Kreate Empowerment & Welfare Foundation) and/or its identified CSR Partner(s) will focus on providing vocational training with special emphasis on skill development to various people including women belonging to socially and economically backward sections of society;
3	Environmental 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 including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Gang	KEIPL would focus on promoting environment sustainability, conservation of natural resources, maintaining quality of soil, air and water through various initiatives including tree plantation as may be deemed appropriate

In addition of the above activities, the scope of the CSR activities of the Company will cover the following areas but not limited to the same and may extend to other specific projects/ programs as permitted under the law from time to time.

- i) Eradicating hunger, poverty, and malnutrition, 'promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available 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, 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.
- 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 and works of art; setting up public libraries; promotion and development of traditional art and handicrafts.
- vi) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows.
- vii) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.
- viii) 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;
- ix) (a) Contribution to incubators or research and development projects in the

field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government and

- (b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting 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.

Further the CSR Activity may be done by the Company itself or through-

- (a) A Company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
- (b) A company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State government; or
- (c) Any entity established under an Act of Parliament or a State Legislature; or
- (d) A company established under section 8 of the Act, or a registered public trust or a society, registered under section 12A and 80G of the Income Tax Act, 1961,

and having an established track record of at least three years in undertaking similar activities.

# 1.3. THE GEOGRAPHIC RESEARCH

In terms of CSR Rules, the Company shall give preference to the local area where it operates and areas around it, for spending the amount earmarked for CSR projects or programs. Since the operations of the Company are carried out at Panipat, Haryana, Himachal Pradesh, therefore, the Company may take initiative to undertake CSR activities in these areas and/or any other areas, as it may deem fit in line with the recommendations of CSR Committee.

# 1.4. ANNUAL EXPENDITURE/ALLOCATION OF FUNDS FOR CSR

The Company would spend not less than 2% of its average net profits made during the three immediately preceding financial years. The surplus arising out of the CSR activities will not be part of business profits of the Company. The corpus would thus include the 2% of average net profits, as aforesaid, any income arising there from and surplus arising out of CSR activities.

# 1.5. PROGRAM IMPLEMENTATION SCHEDULE

The CSR Committee shall prepare an implementation schedule of CSR projects at the beginning of every financial year in the format specified under Annexure III.

#### 2. CSR COMMITTEE

#### 2.1. CONSTITUTION

As per the requirement of the CSR Rules , the CSR Committee will consist of at least two directors at all times, or such higher number of directors as may be required in CSR Rules provided that the composition of Board of the Company so permits. Presently, the Board of the Company consists of two directors, all of whom shall be the members of the CSR Committee. Accordingly, the composition of CSR Committee is as follows:

#### 1. Mr. Kulbhushan Mittal, Chairman

He is a result driven and a self-motivated person. He believes in innovations and technological solution, to meet the dynamic requirements of the clients. Mr.

Kulbhushan travelled across the world and explored the emerging market requirements. With his sharp and visionary mind he launched Kreate Energy (I) Private Limited for trading of commodities and trading and generation of power and textile respectively. With his persistence and passion he paved a growth path for Kreate Group.

#### 2. Ms. Arti Mittal

She hails from a very reputed business family and is actively engaged in social activities. She is a philanthropist and is also actively engaged in day to day business affairs.

# 2.2. FREQUENCY OF MEETINGS

Meetings of CSR Committee shall be held at such times as the CSR Committee deems appropriate by giving a notice of not less than 3 days and in any event, shall be held not less than once in a year. The meetings can be called at a shorter notice with the consent of all the members of the CSR Committee.

# 2.3. QUORUM OF THE MEETINGS

A quorum of two members is required to be present for the proceedings to take place. The CSR Committee members may attend the meeting physically or via such audio-visual means as permitted under the Act. A duly convened meeting of the CSR Committee at which a quorum is present shall be competent to exercise all or any of the authorities, powers and discretions vested in or exercisable by the CSR Committee. The Committee shall have the authority to call such employee(s), senior official (s) and or externals, as it deems fit.

# 2.4. SECRETARY

Company Secretary and in his absence, any other officer as may be authorized by the Board shall act as a Secretary of the CSR Committee. The Secretary shall keep a record of the membership of and the dates of any changes to the membership of the CSR Committee.

### 2.5. REPORTING PROCEDURES

The CSR Committee shall:

- a) Report to the Board on its proceedings after each meeting on all matters within the scope of its duties and responsibilities;
- b) formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely:
  - i. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
  - ii. the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
  - iii. the modalities of utilization of funds and implementation schedules for the projects or programmes;
  - iv. Monitoring and reporting mechanism for the projects or programmes; and
  - v. details of need and impact assessment, if any, for the projects undertaken by the company:
- c) Report its responsibilities and activities during the financial year in a CSR report to be given to the Board;

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

# 2.6. FUNCTIONS OF CSR COMMITTEE

The functions of the CSR Committee shall include:

- a. to formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Act;
- b. to identify the projects / programs for carrying out CSR activities proposed to be undertaken by the Company in pursuance of its CSR Policy;

- c. to recommend the amount of expenditure to be incurred on the activities referred to in clause (a);
- d. to monitor implementation of the CSR Policy of the Company from time to time;
- e. to institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company;
- f. to nominate members of CSR Steering Group;
- g. to receive reports from and review activities of CSR Steering Group (as defined below);
- h. to monitor compliances with the CSR policy and to review performance against agreed targets;
- i. to publicize the CSR Policy and initiatives, especially through mailers, screensaver and Policy documentation and upload(s) on website.
- j. to plan and carry out workshops to increase employee awareness on various projects and initiatives.
- k. To carry out such other activities as may be directed by the Board of the Company and/or as deemed appropriate and expedient by the CSR Committee for the furtherance of CSR objectives of the Company, in terms of the CSR Rules.

# 2.7. TRANSPARENT MONITORING MECHANISM

The CSR Committee shall prepare a transparent monitoring mechanism for ensuring proper implementation of the projects / programs / activities proposed to be undertaken by the Company in pursuance of its CSR Policy. The CSR Committee shall have the authority to obtain professional advice from external sources and shall have full access to the information contained in the records of the Company as well as the powers to call any employee / external consultant or such other person(s) and for such purpose as may be deemed expedient for the purpose of accomplishments of overall CSR objectives laid down under CSR Policy.

#### 2.8. AUDIT OF CSR EXPENDITURE

The CSR Committee may get the amount of CSR spent audited from a reputed professional(s) in order to confirm whether the amount is actually being spent for the CSR projects, programs or activities as laid down in the CSR Policy and approved by the Board of the Company.

# 3. PROCEDURES

#### 3.1 FUNDING

3.1.1 Subject to the CSR Rules, the Company will create a CSR Reserve at the beginning of every financial year and shall transfer the aggregate amount of estimated expenditure (not being less than 2% of the average net profits of the Company made during the three immediately preceding financial years) in the CSR Reserve.

Out of the total estimated expenditure set aside in the CSR Reserve, the CSR Committee shall allocate the amount of expenditure to be incurred on different CSR projects of the Company from time to time.

- 3.1.2 The CSR Committee shall represent such allocation of CSR expenses to the Board in the format specified in Annexure II. The same may be amended annually according to the financial year after the review by the CSR Committee or at such time, as the CSR Committee may deem fit.
- 3.1.3 Any unutilized CSR allocation of a particular year, will be carried forward to the following year, i.e. the CSR budget will be non-lapsable in nature.

Provided that the Company shall make all reasonable efforts to ensure full utilization of annual CSR allocation in the respective year only. However, if the Company fails to spend such amount, the Board shall, in its report under clause (o) of sub-section (3) of section 134 of the Act, specify the reasons for not spending the amount.

- 3.1.4 Tax treatment of CSR expense incurred will be in accordance with the Income Tax Act, 1961 and other rules, regulations and/or notification(s) as may be issued by Central Board of Direct Taxes or other authority.
- 3.1.5 The Company may collaborate or pool resources with other companies forming part of Kreate's Group to undertake CSR activities within India.

# 3.2 PLANNING AND IMPLEMENTATION

- 3.2.1 The Company will undertake its CSR programs/projects or CSR Activities primarily through Kreate Empowerment & Welfare Foundation. However, the Company may also undertake CSR programs/projects through such other external agency (i.e. either a society or trust or company formed under Section 8 of the Act) herein collectively referred to as 'CSR Partner' or 'CSR Partner(s)' as may be approved by the CSR Committee from time to time.
- 3.2.2 The CSR Committee will approve appointment of any CSR Partner(s) after assessing such parameters, including the following, as it may deem appropriate:
  - a) The CSR Partner has a permanent office/address in India;
  - b) The CSR Partner is a Trust, Society, or Section 8 Company having an established track record of three years in undertaking similar CSR programs or projects as laid down in CSR Policy of the Company;
  - c) The antecedents of the CSR Partner are verifiable;
  - d) The CSR Partner has requisite framework to report progress/status of the projects on a quarterly basis on agreed parameters;
  - e) The CSR Partner maintains a required level of auditable records on the CSR initiatives as agreed mutually.
- 3.2.3 The CSR Committee, in consultation of the Board of the Company, will identify suitable projects amongst the CSR projects mentioned in the CSR Policy of the Company which can be implemented through XYZ Foundation and/ the identified CSR Partners.
- 3.2.4 If and when the CSR Partner and the CSR project/program to be implemented through such CSR Partner are finalized and approved by the CSR Committee, the Company and the CSR Partner will enter into an agreement as per the standard MOU requirements covering the various aspects related to implementation of such CSR projects/programs.
- 3.2.5 The Company may build CSR capacities of its personnel and/or personnel of XYZ Foundation and/or those of its CSR Partner(s) but such expenditure shall not exceed five percent of total CSR expenditure of the Company in one financial year.

3.2.6 The CSR plan and the budget shall be placed before the board together with the recommendations of the CSR committee for approval. The company will provide funding only to such projects as may be approved by the board.

#### 3.3 TREATMENT OF UNSPENT, EXCESS, OR SURPLUS CSR AMOUNTS

Until a fund is specified in Schedule VII for the purposes of sub section (5) and (6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act."

#### 3.4 TREATMENT OF UNSPENT CSR FUNDS

- 3.4.1 Transfer to an Unspent CSR Account: Any unspent amount from an ongoing project should be transferred within 30 days of the end of the financial year, to the specifically designated 'Unspent Corporate Social Responsibility Account' to be opened by the company. These amounts should be spent within the next three financial years, in accordance with the company's CSR policy. If these amounts remain unspent even after the three-year period, then they should be transferred, within the period of 30 days from the date of completion of the third financial year, to any fund specified in Schedule VII of the act (such as the PM National Relief Fund, PM CARES Fund, Disaster Management Fund, Clean Ganga Fund, and so on).
- **3.4.2 Transfer to a Schedule VII fund:** If the funds are unallocated to any CSR project, then such unspent amount shall be transferred, within six months of the end of the financial year, to any fund specified in Schedule VII of the act.

#### 3.5 TREATMENT OF SURPLUS CSR FUNDS

If any surplus arises out of the CSR activities, it must be:

- i. Spent on the same project which gave rise to the surplus, or
- ii. Transferred to the Unspent CSR Account of the company, or
- iii. Transferred to a fund as specified in Schedule VII of the act within the period of 6 months of the expiry of the financial year.

#### 3.6 TREATMENT OF EXCESS CSR EXPENSES

If a company has spent amounts more than the mandatory two percent on CSR, the company can set off such excess amounts against the CSR spends in the next three financial years. The board of directors, however, needs to pass a resolution for this. It's important to note that such excess amounts cannot include the surplus arising out of CSR activities.

# 3.7 REVIEW AND REPORTING BY CSR COMMITTEE

- 3.7.1 The CSR Committee shall take a quarterly report from the CSR Steering Group for reviewing the progress of CSR projects/programs and activities undertaken by the Company in pursuance of the CSR Policy.
- 3.7.2 Basis the report received from CSR Steering Group the CSR Committee shall prepare a report which shall include the corrective measures taken up by the CSR Committee, if any and shall submit the same to the Board every six months/such other intervals as deemed fit. The CSR Committee shall take all the necessary and/or corrective steps to ensure the proper implementation of the identified CSR projects.

#### 3.8 DISPLAY OF CSR ACTIVITIES ON ITS WEBSITE

The Board of Directors of the Company shall mandatorily disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.

#### 3.9 CSR REPORTING

The Board's Report of a company covered under these rules pertaining to any financial year shall include an annual report on CSR containing particulars specified.

When the Company having average CSR obligation of Rs.10 Cr. or more in pursuance of sub section (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of 1 crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.

A Company undertaking impact assessment may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed 5% of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is less.

# 4. <u>CSR STEERING GROUP</u>

- 4.1 The administration of the CSR Policy of the Company and the execution of identified projects, programs and activities specified under the CSR Policy shall be carried out under the overall superintendence and guidance of a steering/implementation group ("CSR Steering Group") formed for this purpose.
- 4.2 CSR Steering Group shall prepare and submit to CSR Committee a report covering the status of implementation of CSR Projects/Programs in such format as may be prescribed by CSR Committee on quarterly basis or such other intervals as may be required by the CSR Committee from time to time.

# 5. MONITORING

- 5.1 The Company will report, in the prescribed format as set out herein as Annexure I (or such amended format as may be specified in the CSR Rules from time to time), the details of CSR initiatives and activities of the Company in the Directors' Report and on the website of the Company, as required under the CSR Rules.
- 5.2 Appropriate documentation and amendments of the CSR Policy, annual CSR activities, reports on execution by XYZ Foundation and/or CSR Partner(s) and expenditures will be undertaken on a regular basis and same will be available to the Board of the Company.
- 5.3 The CSR Committee and persons / entities authorized by it will conduct due diligence checks on the CSR projects/CSR partners on a quarterly basis and report anomalies, if any, immediately.
- 5.4 Based on analysis of CSR projects/programs, CSR Committee shall carry out roadmap planning for allocation of budget and selection of projects at least once in a financial year.

# 6. AMENDMENTS TO THE POLICY

The Board on its own and/or as per the recommendations of CSR Committee can amend this Policy, as and when required or as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the CSR Rules on the subject as may be issued from relevant statutory authorities, from time to time.

- 1. Brief outline on CSR Policy of the Company
- 2. Composition of CSR Committee:

Sl. No.	Name of Director	Designation / Nature of Directorship	Number of meetings of CSR Committee attended during the year

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 required to be set- off for the financial year, if any (in Rs.)

- 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:

			<b>Amount Unspent</b>	(in Rs.)	
Total Amount Spent for the Financial	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).		
Year. (in Rs.)			Name of the		
	Amount.	Date of transfer	Fund	Amount.	Date of transfer.

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

(1)	(2)		(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
		(3)								
S1.	Nam	Item	Local	Location	Proj	Amou	Amoun	Amount	Mode	Mode of
No.	e of	from	area	of the	ect	nt	t spent	transferr	of	Implementat
	the	the list	(Yes/	project.	dura	allocate	in the	ed to	Imple	ion -
	Proj	of	No).		tion.	d for	current	Unspent	menta	Through
	ect.	activiti				the	financi	CSR	tion-	Implementin
		es in				project	al Year	Account		g Agency
		Schedu				(in Rs.).	(in	for the	Dire	
		le VII					Rs.).	project		
		to the						as per	ct	
		Act.						Section		
								135(6)	(Yes/	
								(in Rs.).	, •	
								·	No).	

		Dis tric t.				CSR Regist ration number

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

(1)	(2)	(3)	(4	(5)	(6)	(7)	(8)		
SI. No.	Name of the Project	Item from the list of activities in schedule VII to the Act.	Loc al area (Yes / No).	Location the proj	Amount spent for the project (in Rs.).	Mode of implem entation on Dire ct (Yes/ No)	Throug	nenting agend	

- (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.	Precedin g Financial	Amount transferre d to	Amount spent in the reporting	Amount to specified to per section	Amount remaining to be spent in		
	Year.	Unspent CSR Account U/s 135 (6) (In Rs.)	Financial Year (in Rs.).	Name of the Fund	Amount (in Rs).	Date of transfer.	succeeding financial years. (in Rs.)

(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.	Proje ct ID	Name of the Project	Financial Year in which the project was commenc ed	Projec t durati on	Total amount allocate d forthe project (in Rs.)	Amount spent on the project i nthe reporting Financial Year (in Rs)	Cumulative amount spentat the end of reporting Financial Year. (in Rs.)	Status of the project - Completed /Ongoing.

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).

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

Sd/- (Chief Executive Officer or Managing Director or Director)	Sd/- (Chairman CSR Committee)	Sd/-  [Person specified under clause (d) of sub-section (1) of section 380 of the Act] (Wherever applicable).  (Wherever applicable)
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# **Annexure II**

# Format showing allocation of funds for CSR projects/programs

S.	Project Name	Amount(Rs.)
No	·	
I	Total Amount Available for CSR Activities during FY 2014-	
	15	
II.	Identified Projects:	
a.		
b.		
C.		
d.		
	Total amount for identified projects	
III	Balance amount not yet allocated to any project. To be	
	determined by the CSR Committee during the course of the	
	year.	

The aforesaid projects will be implemented by CSR Committee under the overall supervision and monitoring of the Board of the Company.

# **Annexure III**

# Format of CSR Projects' Implementation Schedule and Execution Modalities

Sl. No.	CSR Projects	Implementation Schedule	Execution Modality

# 1. Brief outline on CSR Policy of the Company

In alignment with vision of the Company, the Company through its CSR initiatives will continue to strive for economic development that positively impacts the society at large with minimal resources.

The Company proposes to serve the society and recognizes that Corporate Social Responsibility is not merely compliance; it is a commitment to support initiatives that improves the lives of underprivileged by adopting one or more of the following CSR projects/programmes/activities as notified under Schedule VII of Section 135 of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014.

#### 2. Composition of CSR Committee:

Sl. No.	Name of Director	Designation / Nature of Directorship	Number of meetings of CSR Committee held during the year	
1.	Mr. Kulbhushan Mittal	Managing Director	1	1
2.	Mrs. Arti Mittal	Director	1	1

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:

https://kreateglobal.com/

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).

Not Applicable

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 required to be set- off for the financial year, if any (in Rs.)
1.	2020-2021	Rs. 22,97,526 (Surplus Amount from F.Y. 2019-2020)	N.A.

6. Average net profit of the company as per section 135(5).

INR 3,39,31,754.33/-

7. (a) Two percent of average net profit of the company as per section 135(5)

INR 6,78,635.09/-

(b) Surplus arising out of the CSR projects or programmes or activities of the previous financial years.

N.A.

(c) Amount required to be set off for the financial year, if any

N.A.

(d) Total CSR obligation for the financial year (7a+7b-7c)

INR 6,78,635.09/-

# 8. (a) CSR amount spent or unspent for the financial year:

			Amount Unspent	(in Rs.)	-		
Total Amount Spent for the Financial	transferred to Unspent		Amount transferred to any fund specified under Schedule VII as per second proviso to section 135(5).				
Year. (in Rs.)			Name of the				
	Amount.	Date of transfer	Fund	Amount.	Date of transfer.		
INR 18,00,000/-	N	il		Nil			

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

(1	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)

Sl.	Nam	Item	Local	Loca	ation	Proj	Amou	Amoun	Amount	Mode	Mod	e of
No.	e of	from	area	of tl	ne	ect	nt	t spent	transferr	of	Impl	eme
	the	the list	(Yes/	proj	ect.	dura	allocate	in the	ed to	Imple	ntati	
	Proj	of	No).			tion.	d for	current	Unspent	menta	Thro	
	ect.	activiti					the	financi	CSR	tion-	Impl	
		es in					project	al Year	Account		nting	
	l	Schedu					(in Rs.).	(in	for the	Dire	Ager	
		le VII						Rs.).	project		-	-
	ł	to the							as per	ct	l	
		Act.							Section			
	ĺ								135(6)	(Yes/		
			Į						(in Rs.).			
					ĺ					No).		
										1		CSI
					]						Name	
		i		State	Dis							st
					tric							rati
		1			t.							n
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												ber.
1.	_	Promotin	Yes	Hary	Pan		_					-
		g		ana		~	6,78,635.0	18,00,000	N.A.	Yes	<b> </b>	-
		Educatio						/-				
		n					,	ĺ				

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

(1)	(2)	(3)	(4	(5)	İ	(6)	(7)	(8)	
SI. No.	Name of the Project	Item from the list of activities in schedule VII to the Act.	Loc al area (Yes / No).	Location the proj		Amount spent for the project (in Rs.).	Mode of implem entation on Dire ct (Yes/ No)		CSR
				1	11L				

(d) Amount spent in Administrative Overheads

Nil

(e) Amount spent on Impact Assessment, if applicable

Nil

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

INR 18,00,000/-

# (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)	6,78,635.09/-
(ii)	Total amount spent for the Financial Year	18,00,000/-
(iii)	Excess amount spent for the financial year [(ii)-(i)]	11,21,364.91/-
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any	Nil
(v)	Amount available for set off in succeeding financial years [(iii)-(iv)]	11,21,364.91/-

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

SI. No.	Precedin g Financial Year.	Amount transferre d to Unspent CSR Account U/s 135 (6) (In Rs.)	Amount spent in the reporting Financial Year (in Rs.).	specified 1	ransferred to under Scheo 135(6), if an Amount (in Rs).	dule VII as	Amoun t remaini ng tobe spent in succeed ing financi al years. (in Rs.)
			Ni	L			

(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)
SI. No.	Proje ct ID	Name of the Project	Financial Year in which the project was commenc ed	Projec t durati on	Total amount allocate d forthe project (in Rs.)	Amount spent on the project i nthe reporting Financial Year (in Rs)	Cumulative amount spentat the end of reporting Financial Year. (in Rs.)	Statu s of the proje ct Comp leted /Ongo ing.

NIL

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).

**NOT APPLICABLE** 

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

**NOT APPLICABLE** 

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

NOT APPLICABLE

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

NOT APPLICABLE

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

NOT APPLICABLE

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

NOT APPLICABLE

Mr. Kulbhushan Mittal (Managing Director)

Mr. Kulbhushan Mittal (Chairman CSR Committee)

[Person specified under clause (d) of sub-section (1) of section 380 of the Act] (Wherever applicable). Not Applicable