

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. Corporate Social Responsibility Policy

"In compliance with Section 135 of the Companies Act, 2013, KVGGN Synergy Private Limited (hereinafter referred to as "KVGGN Synergy") has developed a Corporate Social Responsibility (CSR) Policy with the objective of making meaningful contributions to society. This CSR Policy is applicable to KVGGN Synergy and its subsidiaries, collectively referred to as the 'Company.'"

2. Objectives

KVGGN Synergy, a renewable energy company, aims to develop greenfield solar and wind parks, as well as acquire existing assets in underserved and less developed regions of India. A key objective of KVGGN Synergy's strategy is to provide skills, employment, and entrepreneurship opportunities to local communities, with a special focus on women, youth, and marginalized groups, including individuals with disabilities. This aligns with the goal of ensuring a just transition to low-carbon power generation by creating additional job opportunities for local populations.

Many communities living around large utility-scale power projects lack access to energy and electricity, relying instead on kerosene or firewood for lighting, cooking, and daily chores. KVGGN Synergy aims to provide clean, decentralized energy solutions—such as solar lanterns, rooftop solar PV systems, and biogas technologies—to these communities. Leveraging its technical expertise and business capabilities, KVGGN Synergy seeks to contribute to sustainable development outcomes, including improvements in education, livelihoods, and healthcare.

In addition, the company plans to offer training programs for semi-skilled and low-skilled workers, improve access to clean energy in areas surrounding its projects, and foster skills development, employment, and entrepreneurship opportunities for local populations. KVGGN Synergy will collaborate with relevant government organizations, NGOs, and other civil society groups to ensure the successful and meaningful implementation of these initiatives.

3. Coverage of Corporate Social Responsibilities as per Schedule VII of the Companies Act, 2013:

The following table includes the activities as prescribed under the Companies Act, 2013 which may be undertaken by KVGGN Synergy and its subsidiaries as CSR activities. Any activity before implementation shall be approved by the CSR Committee:

Sr. No.	Activities
1	Eliminating hunger, poverty, and malnutrition, "promoting healthcare, including preventive healthcare," and supporting sanitation efforts, including contributions to the Swachh Bharat Kosh established by the Central Government for promoting sanitation and ensuring access to safe drinking water.
2	Promoting education, including special education, and enhancing employment skills, particularly among children, women, the elderly, and differently abled individuals, as well as supporting livelihood enhancement projects.
3	Promoting gender equality, empowering women, establishing homes and hostels for women and orphans, creating old age homes, day care centers, and other facilities for senior citizens, as well as implementing measures to reduce inequalities faced by socially and economically disadvantaged groups.
4	Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources, and maintaining the quality of soil, air, and water, including contributions to the Clean Ganga Fund established by the Central Government for the rejuvenation of the Ganga River.
5	Protection of national heritage, art, and culture, including the restoration of historically significant buildings and sites, as well as works of art; establishment of public libraries; and the promotion and development of traditional arts and handicrafts.
6	Measures for the welfare of armed forces veterans, war widows, and their dependents, as well as veterans and dependents, including widows, of the Central Armed Police Forces (CAPF) and Central Paramilitary Forces (CPMF).
7	training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports
8	Contributions to the Prime Minister's National Relief Fund, the Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund), or any other fund established by the Central Government for socio-economic development, relief, and the welfare of Scheduled Castes, Scheduled Tribes, Other Backward Classes, minorities, and women.
9	Contributions to incubators or research and development projects in the fields of science, technology, engineering, and medicine, funded by the Central Government, State Government, Public Sector Undertakings, or any agency of the Central or State Government.
10	Contributions to publicly funded universities, Indian Institutes of Technology (IITs), national laboratories, and autonomous bodies established under various departments such as the Department of Atomic Energy (DAE), Department of Biotechnology (DBT), Department of Science and Technology (DST), Department of Pharmaceuticals, Ministry of AYUSH (Ayurveda, Yoga and Naturopathy, Unani, Siddha, and Homoeopathy), Ministry of Electronics and Information Technology,

Exclusions:

The following activities shall be excluded from the CSR expenditure of KVGGN Synergy and its subsidiaries:

- Activities which are exclusively for the benefit of employees of the company or their family members.
- Activities undertaken in pursuance of the normal course of business of the Company.
- Direct or indirect contribution to political parties.
- Expenditure on item/s not in conformity with Schedule VII of the Companies Act 2013

4. CSR Committee Composition:

a) KVGGN Synergy and its subsidiaries, as private limited companies, are subject to the provisions of Section 135 of the Companies Act, 2013. Accordingly, the composition and constitution of the CSR Committee shall be governed by these provisions. The authority to constitute the CSR Committee, where necessary, shall rest with the respective Boards, in compliance with the requirements set forth in the Companies Act, 2013.

b) For KVGGN Synergy, the Environment & Social and Development Impact Committee (E&S and DI Committee) of the Board will serve as the CSR Committee. The composition and functions of the E&S and DI Committee align with those outlined for the CSR Committee under the Companies Act, 2013.

5. Meetings of CSR Committee

The CSR Committee may meet at least once in six months. The meeting shall be held either at the registered office of the company or any other place, as may be decided by the members.

Function and Responsibilities of the CSR Committee

a) To formulate & recommend to the Board of Directors, a CSR Policy indicating the activities to be undertaken as specified in Schedule VII of the Companies Act, 2013 and modify / amend the same as required.

b) To review and approve annual budgets with respect to CSR programs.

c) To develop and institutionalize a CSR reporting mechanism in light with Section 135, Rule 8 of the Companies Act 2013;

d) To ensure that the corporate website displays the approved CSR policy of the company.

e) To recommend to the Board for approval the CSR projects to be undertaken by the Company to Monitor the CSR Policy, Projects and Programs from time to time and report the implementation status to the Board from time to time.

6. Implementation mechanism

In accordance with the provisions of the Companies Act, 2013, the Company may undertake and implement CSR programs either directly or through registered trusts, societies, and/or Section 8 (formerly Section 25) companies that have a proven track record of at least three years in carrying out activities in the relevant areas, or as per the guidelines issued by the Ministry of Corporate Affairs through circulars/notifications.

The Company may also collaborate or pool resources with other companies to carry out CSR activities, with any expenditure incurred on such collaborative efforts being eligible for inclusion in the calculation of CSR spending.

The relevant functions will report the progress of these projects to the CSR Committee during its meetings, and the project progress reports will also be presented to the Board for their review and suggestions.

The CSR Committee will be responsible for the day-to-day management of the Company's CSR activities. The team will provide periodic reports to the CSR Committee regarding the financial and programmatic progress of CSR projects.

All projects undertaken by the Company will be subject to regular monitoring. The CSR team will have the authority to appoint an external third party to monitor, review, or audit the financial and programmatic progress of the CSR projects.

7. Effective Date

The CSR Policy shall be effective from the date of its approval by the Board of Directors.

8. Amendments to the CSR Policy

CSR Policy may be updated to align it with the changing requirements or changes in the legal and regulatory framework. Any revision in the Policy shall be approved by the Board of Directors.

Composition of the Corporate Social Responsibility Committee (Known as Environment & Social and Development Impact Committee)

S.NO.	NAME	DESIGNATION
1.	Mr. Kunal Kishore	Chairman
2.	Mr. Vivek Sachan	Member
3.	Mrs. Sonia	Member
4.	Mrs. Meenaxi Vyas	Member