



CORPORATE SOCIAL RESPONSIBILITY POLICY OF CONMAT HEAVY INDUSTRIES PVT. LTD.

INTRODUCTION

Conmat Heavy Industries Private Limited (CHIPL), formerly known as KYB-Conmat Pvt. Ltd, a company engaged in manufacturing of Construction Equipment, recognizes that sustainable business success is linked to be a responsible corporate citizen, and profit has no significance if the organization does not play any role in giving back to the society.

The Company has been an early adopter of Corporate Social Responsibility (CSR) initiatives and committed to contributing to the communities in which it operates by supporting initiatives in multiple areas including education, healthcare, environment and other eligible social development activities. Further, the Company promotes employee engagement in its CSR initiatives to foster a culture of collective responsibility toward society.

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

The Company shall constitute a Corporate Social Responsibility ("CSR") Committee in accordance with the provisions of Section 135 of the Companies Act, 2013 and the rules made thereunder, as amended from time to time, whenever applicable. The CSR Committee shall perform such roles, responsibilities and functions as prescribed under the Act, the CSR Rules and this Policy.

In the event the constitution of a CSR Committee is not required under the applicable provisions of the Companies Act, 2013 and the rules framed thereunder, the Board of Directors of the Company shall discharge all such functions and responsibilities as are otherwise required to be performed by the CSR Committee under the Act.

FOCUS AREA

The Company may undertake any CSR activities which the board may decide from time to time, in any area in accordance with Section 135 of the Companies Act, 2013 and the rules framed thereunder, other applicable statutory amendments, circulars and notifications (collectively "the Applicable Law"). The activities to be undertaken by the Company as specified in Schedule VII of the Companies Act 2013 are:

1. 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.

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 [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 arts and handicrafts;
6. measure for the benefit of armed force veterans, war widows and their dependents Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
7. training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sports.
8. contribution to the Prime Minister's National Relief Fund or Prime Minister's Central Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women;
9. 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
10. 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).

11. rural development projects.

12. slum area development.

13. disaster management, including relief, rehabilitation and reconstruction activities.

14. Any other project as may be specified under Schedule VII of the Companies Act, 2013, from time to time.

BUDGET

The CSR corpus shall comprise the amount required to be spent under Section 135 of the Companies Act, 2013, together with any income or surplus arising from CSR activities, which shall be used only for CSR purposes and shall not form part of the business profits of the Company.

The Board shall ensure that, in each financial year, the Company spends the prescribed CSR amount in accordance with Section 135 of the Companies Act, 2013 and the CSR Rules.

If the Company spends an amount in excess of the requirements provided under Section 135 of the Companies Act, 2013 in a financial year, Company may set off such excess amount against the requirement to spend under Section 135(5) for such number of succeeding financial years and in such manner, as may be prescribed by the law as amended from time to time.

IMPLEMENTATION

The Company may undertake CSR activities directly or through eligible implementing agencies having a valid CSR Registration Number, in each case in accordance with the Act and the CSR Rules.

The Company may collaborate with other companies for CSR projects or programmes, provided reporting and accountability requirements are separately identifiable and compliant with applicable law.

GOVERNANCE, REPORTING & PUBLICATION

The Board shall approve the CSR Policy, the Annual Action Plan, approve CSR projects and budgets, monitor utilization of CSR funds, ensure required certifications and disclosures, and oversee compliance with applicable CSR obligations.

The Annual Action Plan shall, inter alia, include the list of focus areas for CSR for the year and the manner of execution. The Board may alter the Annual Action Plan at any time during the financial year, based on reasonable justification and in accordance with the applicable provisions of the Companies Act, 2013 and the CSR Rules.

CSR implementation status shall be reviewed and monitored by the CSR Committee or the Board, as applicable in accordance with Section 135 of the Companies Act, 2013 and the CSR Rules. The Board shall ensure that CSR funds are utilized for approved purposes and that any unspent or excess CSR amount is dealt with in the manner prescribed under the Act and the Rules.

An annual report on CSR shall be included in the Board's Report and placed before the Board for approval in accordance with Section 135 of the Act and the CSR Rules.

The contents of this CSR Policy and the CSR projects approved by the Board shall be disclosed on the Company's website for public access, as required by applicable law.

Where the Company fails to spend the prescribed CSR amount, the reasons for and treatment of such unspent amount shall be reported and addressed in accordance with the Act and the CSR Rules.

LIMITATION, REVIEW & AMENDMENT

In the event of any conflict between the provisions of this Policy and of the Applicable Law, the provisions of the Applicable Law shall prevail over this Policy. Any subsequent amendment / modification to the Applicable Law shall automatically apply to this Policy.

The Board of Directors may revise, modify or amend this Policy from time to time. Any amendment shall be subject to applicable provisions of the Act; the CSR Rules and other regulations as may be in force.

This Policy shall come into effect from the date of its approval by the Board of Directors i.e., September 10, 2026 and shall remain in force until modified or replaced by the Board.