



## **PENTAGON ASSEMBLY AUTOMATION PRIVATE LIMITED**

**CIN: U29299PN2006PTC128866**

### **REGISTERED OFFICE**

PLOT NO. 294-295, SECTOR NO. 7, PCNTDA, BHOSARI,  
PUNE, MAHARASHTRA, INDIA, 411026

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## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

(as approved vide Board Resolution dated 15.12.2025)



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## 01

### ABOUT THE COMPANY

#### The Company

**Pentagon Assembly Automation** was originally incorporated in 2001 as a partnership firm and operated from a small facility at Chinchwad, Pune. The business began to grow as a result of quality product, optimum cost and excellent customer service.

In 2006, it was registered as an Indian Non-Government Private Limited Company Limited by Shares namely - **Pentagon Assembly Automation Private Limited Company** (Hereinafter referred to as (**“Pentagon”**); and shifted to a new location at Bhosari, Pune. In 2023, a new unit opened at Akrudi, Pune.

The Company has grown from a small unit to a global supplier catering to variety of industries. In our early operational years, we were serving Indian customers, but today the company is no longer just at home, but has a presence in Europe, Asia, and America.

At **Pentagon**, we keep a high-quality standard and always urge to achieve better quality not only in manufacturing but also in service. We assist our clients by accepting their challenges and develop machines which equip them for the future.

We are always in touch with latest technologies which suits with our motto ‘In touch with tomorrow’.

### Business Activities of the Company

**Pentagon** is primarily engaged in the business of Designing and manufacturing custom assembly automation systems, special purpose machines (SPMs), and test rigs; Developing software for PLC (Programmable Logic Controllers), SCADA (Supervisory Control and Data Acquisition), motion control, robotics, and vision systems, and integrating data; Supplying manufactured equipment to various industries both in India and globally (Europe, Asia, and America); Providing commissioning, training, and post-sales support services. In nutshell, **Pentagon** provides automation solutions to diversified end-user industry base.

**Pentagon** has gained a special recognition in the automation industry where the components to be handled are very minute and assembly requires high level of precision.

### Locations

Unit I	Unit II
<b>Pentagon Assembly Automation Private Limited</b>	<b>Pentagon Assembly Automation Private Limited</b>
Plot No D1-15 and 15/A part, MIDC, Pimpri Chinchwad Industrial Area, Pune, Maharashtra, India, Pin Code 411 019	Plot No 294/295, Sect 7, PCNTDA, Bhosari, Pune, Maharashtra, India, Pin Code 411 026

## CSR POLICY

## PREAMBLE AND PHILOSOPHY

- ✓ Corporate social responsibility (CSR) is based on the belief that businesses have a greater duty to society than just providing jobs and making profits. It is the commitment of companies to provide resources and support activities focussed on enhancing economic and social development; and effort made by companies to improve the living conditions of the local area in which they operate and the society at large. The activities taken up as a part of corporate social responsibility reflect the intent to create a positive impact on society without seeking any commensurate monetary benefits.
- ✓ CSR has been a long-standing commitment at **Pentagon** and forms an integral part of our activities. Being a responsible corporate citizen, the Company is committed to performing its role towards the society at large.

## Statement of Commitment

**Pentagon** is committed to conduct business in an economically, socially, and environmentally sustainable manner, adhering to principles of transparency and ethics, by going beyond business goals and contributing to the well-being of the society at large.

## VISION

**Pentagon** strives to be a catalyst for positive societal transformation by integrating social responsibility into core business, creating a thriving environment for all stakeholders.

## MISSION

**Pentagon** is committed to achieve the goals stated in the vision by partnering with credible organizations, ensuring environmental stewardship, focusing on holistic community development, and empowering marginalized groups for sustained growth.

## VALUES

- ✓ **Integrity:** Operating with transparency and ethical conduct.
- ✓ **Compassion:** A willingness to help and build a better society.
- ✓ **Sustainability:** Protecting the environment & using resources responsibly.
- ✓ **Focus:** Considering employees, communities & society's interests.
- ✓ **Impact:** Striving for meaningful, effective, and lasting results.

As per Companies Act, 2013 read with the Corporate Social Responsibility (Rules), 2014 as amended from time to time and various circulars, notifications, press releases, guidance notes, FAQs etc. issued by the Ministry of Corporate Affairs and other professional bodies, every company crossing the threshold limits wr.t. the net worth, turnover, net profits etc. (the limits as specified under the above-stated Act / Rules etc, as amended from time to time, and prevailing as on date), is required to spend a specified percentage of adjusted average profit (as calculated in accordance with the Act, rules etc mentioned hereinabove) towards CSR activities.

As far as **Pentagon** is concerned, the company crossed the threshold limits as on 31<sup>st</sup> March, 2025 and accordingly, the CSR provisions became applicable to the Company effective from the financial year 2025/2026. Since **Pentagon** is exempt from constituting a separate CSR Committee, the board of directors is entrusted to discharge the duties of CSR Committee.

Accordingly, the board of directors have formulated and approved this comprehensive CSR Policy for implementation and monitoring of CSR activities and not only to ensure the compliances under the Companies Act, 2013 but to achieve the primary goal of benefitting the society at large.

**CSR POLICY –OBJECTIVES AND SCOPE**

**Pentagon** is committed to conduct business in an economically, socially, and environmentally sustainable manner, ensuring transparency and ethical behaviour in all our operations. This policy outlines our approach to Corporate Social Responsibility in accordance with applicable legal and regulatory requirements

**Pentagon** aims to create value for the community and promote sustained societal growth. Key objectives include operating responsibly, considering stakeholder interests, defining CSR projects and programs in line with legal requirements, and establishing implementation, monitoring, and evaluation mechanisms. This policy applies to all CSR initiatives by **Pentagon** in India, prioritizing local areas and surrounding regions for spending.

**Pentagon** concentrates on areas including addressing poverty, promoting education and health, supporting gender equality, ensuring environmental sustainability, protecting heritage, assisting armed forces veterans, promoting sports, engaging in rural and slum development, education, healthcare, senior citizen welfare, food distribution, sustainable farming, vocational training, and youth empowerment, maximum utilisation of renewable energy sources, helping NGOs and social organisations in welfare activities etc.



OBJECTIVES IN BRIEF	
✓	<b>Strengthen Community Well-being:</b> To improve the quality of life, health, and economic well-being of the communities where the company operates, especially for disadvantaged and marginalized sections.
✓	<b>Promote Environmental Sustainability:</b> To minimize the company 's environmental footprint by focusing on initiatives like waste reduction, energy efficiency, water conservation, and promoting renewable energy solutions.
✓	<b>Support Inclusive Growth:</b> To promote equity and create opportunities for marginalized groups, thereby contributing to the social and economic development of society at large.
✓	<b>Foster Ethical Business Practices:</b> To ensure the company operates with integrity, transparency, and high ethical standards, adhering to fair labour practices and anti-corruption principles.
✓	<b>Build Stakeholder Trust and Engagement:</b> To strengthen relationships with customers, employees, suppliers, investors, and local communities by consistently showing a commitment to social and environmental responsibility.
✓	<b>Ensure Legal Compliance:</b> To meet and exceed the regulatory requirements and guidelines related to CSR as stipulated by applicable laws (e.g., the Companies Act, 2013 in India).
✓	<b>Drive Long-Term Social Impact:</b> To create measurable, long-lasting change through focused and scalable programs rather than one-off donations.

SCOPE OF CSR POLICY	
✓ <b>Geographical Focus:</b>	Defining the areas where CSR activities will be implemented, often prioritizing local communities near company operations.
✓ <b>Activity Areas:</b>	Specifying the types of projects and programs covered, which often align with legal guidelines. Examples include promoting health, education, environmental sustainability, gender equality, preserving heritage, rural development, and disaster relief.
✓ <b>Stakeholder Coverage:</b>	Outlining which stakeholders are included in the policy's application, typically employees and often extending to suppliers and contractors and public / society at large
✓ <b>Exclusions:</b>	Clearly identifying activities that do not qualify as CSR, such as standard business operations, projects solely benefiting employees, or political contributions.
✓ <b>Implementation and Oversight:</b>	Establishing the process for carrying out CSR activities, including the role of a CSR committee / Board, funding allocation, and methods for monitoring and reporting progress.

KEY FOCUS AREAS
KINDLY REFER ANNEXURE I FOR KEY FOCUS AREAS

**CSR POLICY - OPERATING FRAMEWORK****AUTHORITY**

At present, **Pentagon** need not constitute a CSR Committee, being exempt, and therefore, the board (board of directors) is entrusted with the authority in respect of any matter related to Corporate Social Responsibility

**FINANCIAL ALLOCATION**

- ✓ A minimum of 2% of the average net profits of the past three years must be allocated for CSR activities.
- ✓ Any surplus from CSR activities should be reinvested in CSR or transferred to a government fund.
- ✓ Administrative costs for CSR should not exceed 5% of the total expenditure
- ✓ Unspent CSR amounts, if any, shall be transferred to a specific fund or an 'Unspent Corporate Social Responsibility Account' within a given timeframe, depending on whether the project is ongoing or not.

## IMPLEMENTATION MODALITIES

**Pentagon** can implement CSR activities either:

- ✓ Directly through its own employees or in-house team.
- ✓ Through Implementing Agencies such as a registered trust, registered society, or a Section 8 company with an established track record of at least three years in similar activities.
- ✓ In collaboration with one or more other companies, provided each company reports separately on their progress.

## MONITORING

**Pentagon** shall monitor CSR activities by:

- ✓ Preparing and monitoring Annual Action Plan for CSR funds utilization
- ✓ Review of periodic progress report by the board (progress includes physical as well as financial progress)
- ✓ Obtaining invoices, Purchase Orders, utilization certificates and / or such other necessary documents wr.t. CSR spends
- ✓ Regular field visits and site inspections and / or proofs showing social activities undertaken such as photos, videos etc.

## REPORTING AND DISCLOSURES

By adhering to these policy points and reporting requirements, **Pentagon** ensures legal compliances and demonstrate its commitment to responsible corporate citizenship -

- **Board's Report:** The Board of Directors' report must include a detailed annual report on CSR activities in the format specified by law (Form AOC-4/CSR-2 annexures)
- **Website Disclosure:** The approved CSR Policy, the composition of the CSR Committee, and details of the projects must be displayed on the company's official website for public access.
- **Form CSR-2 Filing:** Every eligible company must annually file Form CSR-2 with the Registrar of Companies as an addendum to their financial statements (Form AOC-4)
- **Reasons for Unspent Funds:** If the company fails to spend the mandatory 2%, the Board's report must specify the reasons for the shortfall.
- **Impact Assessment Reports:** Companies with a significant CSR obligation (average of ₹10 crore or more) must undertake an independent impact assessment for projects with outlays of ₹1 crore or more and annex the reports to their annual CSR report.

## CSR POLICY – DUTIES OF BOARD

At **Pentagon**, the Board holds the ultimate responsibility for CSR compliance and governance. Since the constitution of CSR Committee is exempt at present, the board ensures the following:

- ✓ Formulating CSR Policy, outlining projects aligned with Schedule VII of the Companies Act.
- ✓ Approving the budget and expenditure for CSR activities and developing Annual Action Plan with details on execution, fund utilization, and monitoring.
- ✓ Monitoring the implementation and progress of the CSR policy and projects and reviewing impact assessment reports for large projects, as and when applicable / necessary.
- ✓ Ensuring CSR activities comply with company objectives and legal frameworks and that at least 2% of the average net profits of the preceding three financial years are spent on CSR activities.
- ✓ Satisfying themselves that CSR funds are utilized as approved and obtaining a Fund Utilisation Certification to this effect.
- ✓ Adhering to all reporting and disclosure requirements
- ✓ Handling unspent CSR amounts by transferring them to a special account for ongoing projects or to a Schedule VII fund in other cases.

## CSR POLICY – OTHER IMPORTANT POINTS

### POLICY APPROVAL

This Corporate Social Responsibility Policy has been approved by the Board of directors of **Pentagon** unanimously vide Board Resolution dated 15<sup>th</sup> December, 2025

### POLICY REVIEW AND AMENDMENTS

The policy shall be subject to periodic annual review by the board of directors of **Pentagon**, allowing for updates based on changing needs, regulatory amendments, and feedback from stakeholders

### FEEDBACKS AND SUGGESTIONS

Any feedbacks or suggestions or grievances with respect to the CSR activities being carried out by **Pentagon** pursuant to this policy shall be reported to: [accounts@pentagonassembly.com](mailto:accounts@pentagonassembly.com)

### CLOSING STATEMENT BY THE BOARD

This CSR Policy reflects our unwavering commitment of **Pentagon** to operating the business in a responsible and sustainable manner. **Pentagon** believes that integrating social and environmental considerations into its core operations not only benefits our communities and planet, but also drives long-term value for **Pentagon** and all its stakeholders. **Pentagon** is dedicated to the transparent execution and continuous improvement of these initiatives, striving for a future where business success and social progress go hand in hand.

## CSR POLICY – ANNEXURE I

### (KEY FOCUS AREAS)

POVERTY & HEALTH	
✓	Eradicating hunger, promoting healthcare, sanitation (Swachh Bharat Kosh), safe drinking water
✓	Promoting healthcare, disability inclusion, and rehabilitation initiatives
✓	Providing meals and basic healthcare support to special-able, handicapped and diagnosed disorder children also including those with disabilities
✓	Provision of nutritious, hygienic, and medically appropriate meals to hospitalized patients for economically weaker and backward sections
✓	Arranging medical camps typically focuses on promoting healthcare, including preventive health, for underprivileged communities
EDUCATION & SKILLS	
✓	Promoting education (special needs, women, elderly), vocational skills, livelihood projects
✓	focusing on investing in learning opportunities, infrastructure, involving activities like building schools, providing scholarships/books, supporting teacher training, inclusive education, skill development and empowerment of special-abled children and underprivileged students.



GENDER EQUALITY & WELFARE	
✓	Empowering women, old age homes, reducing inequalities for backward groups.
ENVIRONMENT	
✓	Ensuring sustainability, protecting flora/fauna, agroforestry, soil/air quality; Investing in renewable energy sources like solar and wind power.
ART & CULTURE	
✓	Protecting heritage, promoting traditional arts, setting up libraries.
DEFENCE & VETERANS	
✓	Benefits for armed forces veterans, war widows, and training for sports.
DISASTER MANAGEMENT	
✓	Relief, rehabilitation, and reconstruction.
TECHNOLOGY & RESEARCH	
✓	Contributions to approved tech incubators and research bodies (like CSIR, ICAR, IITs) for SDGs
✓	Initiatives focused on reducing the ecological footprint, waste minimization, renewable resources, and conservation, often leveraging technology for efficient solutions.

## CSR POLICY – ANNEXURE II (BOARD RESOLUTION)

**CERTIFIED TRUE COPY OF THE RESOLUTION PASSED BY THE BOARD OF DIRECTORS OF THE COMPANY AT ITS MEETING HELD ON 15<sup>TH</sup> DAY OF DECEMBER, 2025 AT THE REGISTERED OFFICE OF THE COMPANY AT 11.00 A.M.**

### APPROVAL OF CSR POLICY AND RELATED MATTERS

**“RESOLVED THAT** pursuant to the provisions of Section 135 and other applicable provisions, if any, of the Companies Act, 2013, read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, (including any statutory modification(s) or re-enactment(s) thereof for the time being in force), the comprehensive draft Corporate Social Responsibility (CSR) Policy of the Company, as placed before the Board and initialed by the Chairperson for the purpose of identification, be and is hereby approved and adopted.

**RESOLVED FURTHER THAT** the Board hereby approves the CSR initiatives outlined in the said Policy and commits to spending at least two percent (2%) of the average net profits of the Company made during the three immediately preceding financial years (or average net profits of preceding two financial years in case of a startup company or any other applicable criteria), in pursuance of the said Policy.

**RESOLVED FURTHER THAT** the approved CSR Policy be disclosed in the Board’s Report for the relevant financial years and be hosted on the official website of the Company at <http://www.pentagonassembly.com/>

**RESOLVED FURTHER THAT** the Board be and is hereby authorized to effectively monitor the implementation of the CSR activities, approve specific annual action plans within the scope of the approved policy, finalize the annual CSR report, and recommend any necessary modifications or amendments to the Policy to the Board of Directors from time to time.

**RESOLVED FURTHER THAT** all or any member of the board and is / are hereby authorised to ensure the compliances under any applicable Act, rules etc.; and ensure necessary disclosures of CSR activities in the books of accounts, financial statements, registers and records maintained by the Company; and is / are authorized to take all necessary steps, actions, and file such e-forms, returns, or other documents with the Registrar of Companies (ROC), or any other regulatory authority as may be required to give effect to this resolution.”

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**THANK YOU**