

PITAMBARI PRODUCTS PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

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ABBREVIATIONS:

“Act” shall mean the Companies Act, 2013 including any modifications, amendments or re-enactments thereof.

“Rules” shall mean the Companies (Corporate Social Responsibility) Rules, 2014 including any modifications, amendments or re-enactments thereof.

“CSR” shall mean Corporate Social Responsibility.

“Financial Year” shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.

“Net Profits” shall mean the net profits of the Company as defined under the Act and the Rules based on which a specific percentage for CSR expenditure has to be calculated.

“Company” shall mean Pitambari products Private limited.

“Board” shall mean the Board of Directors of the Company.

“Approved Budget” shall mean the total budget as approved by the Board of the Company, which is to be spent or utilized for CSR activities.

“Annual Plan” shall mean the annual plan for CSR expenditure for the year.

“CSR Committee” shall mean the Corporate Social Responsibility Committee as constituted by the Board of Directors of the Company in accordance with the Act and the Rules made thereunder.

“CSR Policy” shall mean the Corporate Social Responsibility Policy of the Company.

“CSR Activities” shall mean all the Corporate Social Responsibility activities/programs/initiatives of the company, either ongoing or new specified in Schedule VII to the Act (as amended from time to time), as recommended by the CSR Committee and approved by the Board.

“CSR Expenditure” shall mean all CSR expenditure as recommended by the CSR Committee and approved by Board of Directors.

1. Short title

The Corporate Social Responsibility policy of the Company encompasses its philosophy as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large.

This policy shall apply to all CSR initiatives and activities taken up by the Company for the benefit of different segments of the society.

2. Aim and Objectives

As a responsible corporate entity, the Company consistently strives for opportunities to meet the expectation of its stakeholders by pursuing the concept of sustainable development with focus on the social welfare activities and cover the activities as per Schedule VII of the Act as mentioned below.

3. Activities under Corporate Social Responsibility

The Company endeavors to adopt an integrated approach to address the community, societal & environmental concerns by taking up a range of the following activities, which shall be taken up strategically, in a focused manner to the extent possible and allowed as per Section 135 of the Act and the applicable rules and regulations as may be prescribed in this regard, including any modification (s) thereof.

CSR activities:

CSR activities will include the following activities relating to:

- a. 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.
- b. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- c. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- d. 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.
- e. 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;

- f. 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];
- g. Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
- h. Contribution to the prime minister's national relief fund 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;
- i. (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 Organisation (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).]
- j. Rural Development Projects
- k. 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.

- l. Disaster Management, including relief, rehabilitation and reconstruction activities.

Any other activities in relation of the above and all other activities which forms part of CSR as per **Schedule VII** of the Act as amended from time to time.

4. Prohibited activities under CSR

The Company will abstain from carrying out the following activities under CSR that may create dissatisfaction in any section of the Society:

- a. Activities disturbing social harmony in any manner.
- b. Activities exclusively for the benefit of employees of the company or their family members.
- c. Such other activities as may be prohibited by Central Government.

Further, the CSR activities of the Company will not include the activities undertaken in pursuance of normal course of business of the Company. Any contribution directly or indirectly to any political party or any religious groups will not be considered as CSR activity.

5. Implementation mechanism

- a. The Company will work in partnership with other organizations also which shall include collaborating with various organizations which are registered as a Trust or Section 25 Company under Companies Act, 1956 / Section 8 Company under the Act.
- b. The Company may also collaborate with society or NGO's or any other form of entity incorporated in India that specializes in CSR activities.
- c. The Company shall also take into consideration and verify the prescribed previous track records of the organizations through it proposed to implement the CSR expenditure.
- d. The Company shall constitute a CSR committee as per the provisions of Act which shall devise and recommend various plans for implementation of CSR expenditure of the Company.
- e. The Board of the Company shall also keep a check and ensure the implementation of various initiatives which are recommended by the CSR committee.
- f. The duration of a particular CSR project shall depend on its nature, extent of coverage and the intended impact of the project.

6. Planning and Co-ordination

- a. The CSR committee shall prepare an annual plan for CSR activities for each year within the budgetary provisions.
- b. The CSR Committee shall recommend the annual plan to the Board for their approval.
- c. The Board shall give its approval based on the recommendation of the Committee and in compliance of this policy which shall be then executed by the Company.

7. Monitoring and Evaluation

Regular updates on the CSR initiatives undertaken and/ or to be undertaken shall be given to the CSR Committee and/or the Board. The impact of the CSR activities may be quantified to the extent possible.

8. Allocation of Funds

- a. The CSR committee shall calculate and recommend to the Board the amount to be spent as CSR expenditure as per the provisions of Companies, 2013.
- b. The said CSR expenditure shall be approved by the Board and shall be earmarked for implementation of CSR programmes.
- c. The surplus arising out of the CSR projects or programs or activities shall not form part of the business profits of the Company.

9. Miscellaneous Provisions

- a. In case of any doubt with regards to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the CSR Committee. In all such matters, the decision of the CSR Committee shall be final.
- b. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Act rules and regulations as may be prescribed by the Central Government, from time to time.
- c. The CSR Policy may be modified from time to time by the Board of the Company on recommendation of the CSR Committee.