



Corporate Social Responsibility Policy

Introduction

Corporate Social Responsibility (CSR) is strongly connected with the principle of sustainability; an organisation should make decisions based not only on financial factors, but also by considering the social and environmental consequences. As a corporate citizen receiving several benefits from society, it is our coextensive responsibility to pay back to society in a multitude of ways such as helping needy people, adhering to the best industrial practices and adopting best technologies to keep the environment safe and clean, and such like. It is the company's intent to make a positive contribution to the society in which it operates.

CSR and the legal framework in India

The new Companies Act, 2013 (hereinafter referred to as 'the Act'), has brought the idea of CSR to the forefront. Its 'Comply-or-Explain' mandate decrees qualifying companies to constitute a Corporate Social Responsibility Committee to effectively monitor CSR activities of the company. Further, the Companies (Corporate Social Responsibility Policy) Rules, 2014, (hereinafter referred to as 'CSR Rules') lay down the framework and modalities of carrying out CSR activities which are specified in Schedule VII of the Act.

Scope and Objective

This CSR Policy covers current activities as well as those proposed to be undertaken by the company. It covers CSR activities being carried out in India only and includes strategy that defines plans for future CSR activities.

The CSR Policy focuses on addressing social, environmental and economic needs of the underprivileged sections of society. The policy is aimed at benefitting the community at large and creating social and environmental impact.

The company would like to carry out its CSR activities in different areas, such as healthcare, medical aid, sanitation, drinking water, education, rural development, vocational skills, entrepreneurship skills, employment opportunities, special employment opportunities for women, environment protection, conservation of natural resources, contributions to funds set up by the central or state governments for development and welfare of scheduled castes, scheduled tribes and minorities, contribution to technology, incubators located within academic institutions, Go Green initiatives and/or any other area as may be prescribed by Schedule VII as may be amended from time to time.

The company will review the sectors from time to time

and make additions/deletions/ modifications in them.

Constitution of the CSR Committee

Composition

The CSR Committee shall consist of three or more directors, out of which at least one shall be an independent director.

Role

The Committee, referred to above, shall:

- Formulate and recommend to the Board the CSR Policy and any amendments thereto which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Companies Act, 2013
- Recommend the amount of expenditure to be incurred on the activities, as per CSR Policy
- Be responsible for implementation and monitoring of CSR projects or programs or activities of the company
- Take up any other matter as may be considered expedient by the members in furtherance of and to comply with the CSR Policy of the company

Meetings

The CSR Committee shall meet as and when deemed necessary but at least twice a year.

Sitting Fees

The Sitting Fees for attending meetings shall be payable to the members of the Committee as determined from time to time by the Board of Directors.

Quorum

The quorum for meetings of the CSR Committee shall be one-third of the total strength or two directors, whichever is higher. The CSR Committee may invite executives, advisors, representatives of social organisations, auditors of the company and such other person(s) as it may consider necessary to attend the meeting.

Powers of the CSR Committee

- Review CSR Policy from time to time and recommend it to the Board of Directors of the company for approval
- Recommend CSR activities, as stated in Schedule VII of the Act
- Approve to undertake CSR activities in collaboration with other companies, firms, NGOs etc. and to separately report the same in accordance with the CSR Rules

- Recommend the CSR budget
- Spend the allocated CSR budget on CSR activities once it is approved by the Board of Directors of the company in accordance with the Act and CSR Rules
- Create a transparent monitoring mechanism for implementation of CSR initiatives in India, particularly in and around the locations of the company's plants
- Submit reports to the Board in respect of the CSR activities undertaken by the company
- Monitor activities/the charter of the Joint Working Group (JWG) authorised to ensure effective implementation of the company's CSR activities
- Authorise executives of the company to attend meetings of the CSR Committee

CSR Plan

The CSR Plan is a yearly plan of CSR activities that will be placed before the Board of Directors of the company, based on the recommendations of its CSR Committee. It will outline the following aspects of the company's CSR initiatives:

- Tailor-made CSR projects depending upon allocated spends and geographical presence
- Partnering agencies/companies/firms
- Project proposals
- Targeted beneficiaries and their needs
- Alignment with Schedule VII of the Act
- Project goals and milestones
- Activities and timelines including expected closure dates
- CSR budget with projections
- Monitoring mechanism
- Progress reporting and frequency of reports
- Risks and mitigation strategies
- Any other information as may be required by the CSR Committee

Publication of CSR Report

As per CSR Rules, the contents of the CSR Policy shall be included in the Directors' Report. These will also be displayed on the company's website.