



CORPORATE SOCIAL RESPONSIBILITY POLICY

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May 24, 2018	May 24, 2018	Original
April 28, 2021	April 28, 2021	V - 1
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Corporate Identity Number: L24100GJ2007PLC051093

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CORPORATE SOCIAL RESPONSIBILITY POLICY - ACUTAAS CHEMICALS LIMITED

1. PREAMBLE

Acutaas Chemicals Limited (“Company”) has formulated the Corporate Social Responsibility Policy in compliance with Section 135 of the Companies Act, 2013 read with relevant rules and Schedule VII of the Companies Act, 2013. It shall apply to all CSR Projects/ Programmes undertaken by the Company as per liberal interpretation of activities listed in Schedule VII of the Act, within the geographical limits of India, preferably towards the benefits of marginalised, disadvantaged, poor and deprived sections of the community and the sustainable environment. Capitalized terms used in this Policy and not defined herein shall have the meaning as ascribed to them under the Act. This policy was initially adopted by the Board on May 24, 2018 and later substituted by the Board on April 28, 2021.

2. OBJECTIVE

- (i) The main objective of the CSR Policy is to lay down guidelines for ACUTAAS CHEMICALS LIMITED to make CSR as one of the key focus areas to adhere to company's interest in health, environment and society that focuses on making a positive contribution to society through effective impact and sustainable development programs.
- (ii) This Policy covers the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities.

3. SCOPE AND COVERAGE

The CSR activities of the Company shall include, but not limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 amended from time to time. Further, the Company shall review the sectors/activities from time to time and make additions/ deletions/ clarifications to the above sectors/activities.

4. DEFINITIONS

“Company” means Acutaas Chemicals Limited or “ACL”.

“Act” means The Companies Act, 2013 and includes the Companies (Corporate Social Responsibility Policy) Rules, 2014 and all other applicable rules and any statutory modifications, re-enactment thereof.

“Board” means the Board of Directors of the Company.

“Corporate Social Responsibility” CSR means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in Companies (CSR Policy) Amendment Rules, 2021.

“CSR Committee” means the Corporate Social Responsibility committee constituted under Section 135(1) of the Act.

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“Net Profit/Profit” refers to the average net profits of the Company, calculated in the manner as provided under the Act.

5. CONSTITUTION OF THE CSR COMMITTEE

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR shall be appointed by the Board of Directors of the Company, the composition of which shall be in accordance with Section 135 of the Companies Act, 2013 as amended from time to time.

The CSR Committee of the Company shall be responsible for:

- a) Formulating and recommending to the Board, the CSR Policy which shall indicate activities to be undertaken in line with Section 135 read with Schedule VII of the Act.
- b) Recommending to the Board, the CSR expenditure to be incurred.
- c) Monitoring the implementation of the CSR Policy of the Company from time to time.
- d) Formulation of Annual action plan for CSR expenditure, projects or programmes, utilization of funds, implementation schedules and monitoring and reporting mechanism.

6. CSR OPPORTUNITIES

In accordance with Schedule VII to the Companies Act, 2013, activities relating to following may be included by the Company in its Corporate Social Responsibility Policy:

- (i) 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;
- (ii) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) 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;
- (iv) 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 Clean Ganga Fund set- up by the Central Government for rejuvenation of river Ganga;
- (v) 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;

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- (vi) 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;
- (vii) Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports;
- (viii) 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 Government or the State Governments for socio-economic development and relief and funds for the welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- (ix) 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
- (x) 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)
- (xi) Rural development projects;
- (xii) Slum area development.
- (xiii) disaster management, including relief, rehabilitation and reconstruction activities
- (xiv) Any other projects or activities approved by the Central Government pursuant to Section 135 of the Act, from time to time. Keeping in view of the spread of the novel COVID-2019 in India, spending of CSR funds for various activities related to COVID-2019 is an eligible CSR activity

Further, the Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities.

In the event where the Company makes any surplus or profit from pursuing its CSR projects/programmes, these will not form part of the business profit (but will, instead, be carried forward to the following year/s as part of either the CSR corpus or as a supplement to the CSR budget).

For all contributions received from other companies/sources towards the CSR Corpus/Budget, the Company will claim CSR expenditure only for funds that are provided from its own resources.

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7. FOCUS AREAS AND GOALS

In accordance with requirements of the Act, Company's CSR activities, amongst others, will focus on the following areas:

- (i) Promotion of education and healthcare, and,
- (ii) Eradication of hunger,
- (iii) Betterment of the society through respect for universal human rights and the environment
- (iv) Taking up programmes that benefit the communities in vicinity wherever the Company operates and results, over a period of time, in enhancing the quality of life & economic wellbeing of the local populace.

- (v) Collaborating with communities and institutions to contribute to the national mission of eradicating poverty and hunger, especially in rural areas, through agricultural research and knowledge sharing, conservation and development of forest resources, empowering women economically, supplementing primary education and participating in rural capacity building programs and such other initiatives.

8. RESOURCES AND CSR BUDGET

To achieve the above goals, the Company shall allocate funds at such per cent. of the average net profits of the company made during the three immediately preceding financial years, as prescribed under section 135 of the Companies Act, 2013 or under any applicable rules made thereunder, as its annual CSR Budget. The surplus arising out of the CSR activities if any, shall be re-invested into CSR initiative only, and shall not form the part of business profit. And such surplus shall be in addition to funds allocated by the Company every year for the annual CSR budget. Until a fund is specified in Schedule VII for the purposes of subsection (5) and (6) of section 135 of the Act, the unspent applicable CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act.

9. IMPLEMENTATION:

Company will implement its CSR activities in accordance with Section 135 of the Companies Act 2013 and rules notified thereunder. The Company may undertake and/or initiate CSR activities by setting up registered Trust/ Societies/ Company under section 8 of the Companies Act, 2013 or established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature.

Company may also conduct/implement its CSR programmes through registered public Trusts, registered Societies registered under section 12A and 80G of the Income Tax Act, 1961, or Section 8 Companies operating in India in respect of which Form CSR 1 is filed with ROC, which are not set up by the Company itself. Such spends may be included as part of its prescribed CSR spend only if such organizations are registered and have an established track record of at least three years in carrying on activities in related areas. Further, the Company may donate funds to registered trust/society/ Section 8 Company- Companies with Charitable Objects etc., where it is created exclusively for

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undertaking CSR activities or where the corpus is created exclusively for a purpose directly relatable to a subject covered in schedule VII of the Companies Act, 2013.

It may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that the CSR Committees of respective companies are in a position to report separately on such projects or programs in accordance with these rules.

10. MONITORING

It will be the responsibility of the CSR committee to monitor periodically the implementation of the projects/programmes /activities under this CSR policy. The Board of Directors will monitor and review the progress of CSR activities undertaken/ completed. Project selection and progress of projects will additionally be reviewed by the CSR committee on a regular interval. Committee shall also have powers to ratify any CSR related expenditure incurred by the Company on the areas/activities as per schedule VII of the Act.

11. DISCLOSURE

The Company shall comply with provisions of section 134 & 135 of the Act thereby ensuring that it makes disclosure of its CSR Policy, Projects/ Programmes, Activities, Implementing Agencies, Expenditure details as well as the composition of the CSR Committee of the Board, as required under the Act. The contents of the CSR Policy composition of the CSR Committee, and Projects approved by the Board shall be included in the Directors' Report and the same shall be displayed on the Company's website www.acutaas.com .

12. REVIEW MECHANISM

The Policy shall be reviewed and revised as and when required by the CSR committee subject to the approval of board of directors but will, at all times be subject to the applicable laws.

13. INTERPRETATION

In case of any conflict between the provisions of this Policy and provisions of any applicable law, the provisions of the applicable law shall prevail over this Policy. Any subsequent amendments/modifications in the provisions of applicable law shall automatically apply to this Policy.
