

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. PREAMBLE:

- 1.1 Ambuja Neotia has always believed in utilizing its inherent capabilities and strengths to reach out to people and bring happiness to their lives in whatever way possible.
- 1.2 Herein lays the identity of Ambuja Neotia, which recognizes its greater responsibilities towards the community, to society and to the environment.
- 1.3 It takes inspired decisions that help to not only improve the present but also to empower the future generations to come.

2. SHORT TITLE AND APPLICABILITY

- 2.1 This policy lays down the guiding principles and mechanism for undertaking socially responsible projects for the welfare of the community at large. This policy shall be known as "***Corporate Social Responsibility Policy***" ("***CSR Policy***").
- 2.2 This policy shall apply to all CSR initiatives undertaken or to be undertaken.

3. CORPORATE SOCIAL RESPONSIBILITY COMMITTEE:

- 3.1 A sub-committee of the Board of Directors shall be formed as per the applicable laws "***CORPORATE SOCIAL RESPONSIBILITY COMMITTEE***" ("***CSR Committee***").
- 3.2 The CSR Committee shall be responsible for the implementation / monitoring and review of this CSR Policy and the various projects / activities undertaken under the CSR Policy.
- 3.3 The CSR Committee shall consist of a minimum three directors, including an independent director.
- 3.4 The Board of Directors may amend the constitution of the CSR Committee as and when the Board of Directors of the Company feels it necessary to do so.
- 3.5 The CSR Committee shall hold at-least two meetings in every financial year.
- 3.6 The quorum for the meeting shall be 1/3rd (one-third) of the total strength of the committee or two directors, whichever, is higher;
- 3.7 The CSR Committee shall be entitled to induct such persons in the committee as the CSR Committee deems fit and proper;
- 3.8 The CSR Committee shall be entitled to invite such persons at its meetings as the CSR Committee shall deem fit and proper.
- 3.9 The Company Secretary shall be the secretary of the CSR Committee and shall be its Nodal Officer.

4. FUNDING:

- 4.1 For achieving its CSR objectives through implementation of meaningful and sustainable CSR Programmes, the Company will allocate 2% (two percent) of the average net profits of the Company, made during the 3 (three) immediately preceding financial years (“**CSR Budget**”)
- 4.2 Net profits, for this purpose, shall have the same meaning as ascribed to it under Section 135 of the Companies Act, 2013 and the rules framed thereunder.
- 4.3 The CSR corpus would include the following:
- 4.3.1 CSR Budget;
 - 4.3.2 Any income arising out of the Annual CSR Budget;
 - 4.3.3 Any Surplus arising out of the CSR activities.
- 4.4 Any surplus arising out of the CSR activities will not be part of the business profits of the Company.

5. ACTIVITIES TO BE UNDERTAKEN:

5.1 Contribution towards educational initiatives:

The educational initiatives shall encompass any of the following:

- (i) Support to technical / vocational institutions for their self development;
- (ii) Academic education by way of financial assistance to primary, middle and higher secondary schools;
- (iii) Adult literacy especially amongst populace belonging to the below poverty line;
- (iv) Awareness programmes on girl education;
- (v) Special attention on education, training and rehabilitation of differently abled children / persons;
- (vi) Provide fees for a period of one year or more to the poor and meritorious students, preferably girl students of the schools in the operational area of the Company to enable them to get uninterrupted education;
- (vii) Provide scholarships to poor and meritorious students, preferably girl students to enable to get them uninterrupted education;
- (viii) Provide cycle to needy girl students, who are attending schools in remote and distant areas;
- (ix) Arranging for vocational training courses for training of youths for gainful employment opportunities.

5.2 Contribution towards healthcare initiatives:

The healthcare initiatives shall encompass any of the following:

- (i) Organizing health camps, rural medical camps, blood donation camps, etc.;
- (ii) Awareness programmes on diet and nutrition;
- (iii) Awareness programmes on child and mother care;
- (iv) Diabetics detection and hypertension camps;
- (v) Family welfare;
- (vi) Senior citizen healthcare and wellness clinic;
- (vii) Providing fully equipped mobile medical van to hospitals in the operational area of the Company;
- (viii) To supplement the different programmes of local / state authorities.

5.3 Contribution towards women empowerment initiatives:

The women empowerment initiatives shall encompass any of the following:

- (i) Creating self help groups for gainful employment opportunities;
- (ii) Organizing training programmes for women on tailoring; embroidery designs, pickles, painting, interior decoration, incense stick making and other vocational courses;
- (iii) Adoption / construction of hostels.

5.4 Contribution towards community development initiatives:**(i) Eradicating hunger, poverty and malnutrition**

- (a) Provision of food, nutrition supplement, clothes etc for the poor, children and other deprived sections of the society.
- (b) Supporting nutrition in anganwadi centers and building capacities of anganwadi workers to this effect.
- (c) Provision of shelter for homeless.
- (d) Promoting sanitation, making available safe drinking water

(ii) Ensuring environmental sustainability and ecological balance through

- (a) Plantation drives in schools, villages, our manufacturing units and offices / business premises and other areas in general;
- (b) Reviving endangered plants, promoting agro-forestry;
- (c) Protection of flora and fauna;
- (d) conservation of natural resources
- (e) Maintaining quality of soil, air & water.
- (f) Adoption of wastelands to cultivate plants;
- (g) Promoting biodiversity;
- (h) Animal welfare and veterinary services.
- (i) Technical support and Knowhow for improving farming and building capacities of small farmers.
- (j) Promoting alternate energy resources.

5.5 The above list is illustrative and not exhaustive. The CSR Committee shall be authorised to consider CSR activities on such activities as permitted under the provisions of the Companies Act, 2013.

5.6 Subject to the approval of the Board of Directors; the CSR Committee shall be authorised to amend any provisions with respect to funding of the CSR Corpus.

6. IMPLEMENTATION

6.1 The CSR activities shall be undertaken to the best possible extent on its own and within the defined ambit of the CSR Policy.

6.2 At the same time, the CSR activities may be undertaken in partnership with other players also. This would include:

6.2.1 Collaborating with various organisation, which are registered as a Trust or a section 8 company under the Companies Act, 2013 or Society or NGOs or any

other form of entity incorporated in India that specialise in the aforesaid activities.

- 6.2.2 Contribution to various funds like the Prime Minister's National Relief Fund and / or any other fund set up by the Central Government for socio-economic development and relief for the welfare of Scheduled Castes, the Scheduled Tribes, other Backward classes, minorities and women.
- 6.2.3 Collaborating or pooling resources with other companies to undertake aforesaid CSR activities.

7. MONITORING AND FEEDBACK

- 7.1 The CSR Department will provide periodical progress report to the CSR Committee of the Board.
- 7.2 This report would indicate:
 - 7.2.1 Achievement since last progress report / during the last quarter in terms of coverage compared to the target and reasons for variance.
 - 7.2.2 Actual year-to-date spends compared to the budget and reasons for variance.
 - 7.2.3 In respect of activities undertaken through outside Trust/Society/NGO's etc. the mechanism of quarterly reporting of progress on each such activities and the amount incurred thereon.
- 7.3 The CSR Committee shall submit periodical reports to the Board of Directors.

8. GENERAL:

- 8.1 In case of any doubt with regard to any provision of this CSR Policy and also in respect of matters not covered herein, a reference shall be made to the CSR Committee. In all such cases, the interpretation and decision of the CSR Committee shall be final.
- 8.2 Any or all provisions of the CSR Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by the Central Government, from time to time, by the CSR Committee.