



ANUPAM RASAYAN INDIA LTD.

CIN: U24231GJ2003PLC042988

Preamble:

The Anupam Rasayan India Limited's Corporate Social Responsibility Policy (Policy) has been developed in consonance with Section 135, Companies Act, 2013 (the Act) on CSR and in accordance with the CSR Rules (Rules) notified by the Ministry of Corporate Affairs, Government of India. 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.

Vision Statement & Objectives:

- (i) The Company aspires to be a responsible Corporate Citizen, by contributing to nation building through CSR Projects/ Programmes, in true letter and spirit, as enshrined in the Act.
- (ii) The Policy, which has been formulated in alignment with the Vision of the Company, lays down guidelines and mechanisms to be adopted by the Company in order to carry out CSR Projects/ Programmes.
- (iii) All CSR interventions will be conceived and implemented through a focused approach towards target beneficiaries for generating maximum impact.
- (iv) CSR initiatives of the Company will be carried out in partnership with credible Implementing Agencies and by the Company itself too.

CSR Budget

- (i) The Board of the Company will ensure that in each financial Year (FY), at least two percent (2%) of the average net profits (calculated as per prescribed guidelines under the Act) accrued during the three immediately preceding FY's and is spent on CSR projects/ programmes.
- (ii) In the event that the amount indicated above is not spent in its entirety in that FY, the reasons thereof will be outlined as is required under the Act.
- (iii) Projects/ Programmes will be identified and budgets allocated for such through a process incorporating identification of suitable implementation agencies, need assessment (where required) and clear outlining of the desired outcomes.
- (iv) List of Activities and projects under Schedule VII of Companies Act, 2013 for investing/expending in CSR Initiatives to be undertaken by the Company:-
 - 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;



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- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
 - 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.**
 - Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes other backward classes, minorities and women;
 - Contribution or funds provided to technology incubators located within academic institutions which are approved by the CG
 - Rural development projects
- (v) 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.
- (vi) 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.

Planning and Implementation:

The CSR activities shall be in the form of Projects/ Programmes, which will as far as possible, entail the following components:

- a) Need Based Assessment/ Baseline Survey/ Study where considered necessary/ feasible;
- b) Identification of specific & measurable objectives/ goals in identified sectors and geographies;
- c) Identification of timelines-
- d) Annual financial allocation wherever possible.
- e) Identification of beneficiaries
- f) Identification of milestones for complete duration of the project if possible;
- g) Preparation and signing of agreement with implementing agencies;
- h) Periodic reviews and monitoring
- i) Evaluation & assessment

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Opportunities for complementing/ supplementing Government Initiatives/ programmes will be explored.

The Company would assign priority to projects/ programmes of medium (1-3 years) or longer duration (more than 3 years) in order to ensure emphasis on long term outcomes/ impacts.

The Company will lay emphasis on the sustainability of its projects/ programmes to ensure they remain relevant and viable even upon disengagement at the end of the project period.

The Company will explore possibilities for collaborating/ co-operating with other Corporates/ National/ Multi-National/ Bi-lateral International Agencies in order to synergies its efforts and increase both financial resources as well as outcomes and impact.

The Company may also consider participating in larger Projects/ Programmes where more than one Corporate/ National/ Multi-lateral/ Bi-lateral/ International Agency is involved.

The Company will endeavour at all the times to build and develop the skills of its CSR team and enhance levels of CSR awareness within the organisation.

The Company will also endeavour to build and develop the skills of the Implementing Agency that it engages whenever necessary.

Monitoring and Evaluation

A comprehensive Monitoring and Evaluation mechanism will be devised by the Company to ensure that the CSR process functions as mandated by the Act and the Rules, ensuring that all Projects/ Programmes are duly implemented as budgeted. This will be done on the basis of the following:

- i. Allocation of a separate budget for setting up and running the monitoring system;
- ii. Installation of human architecture that can work together to ensure a firm check on speeds and the actual implementation of activities as planned;
- iii. Release of funds only against valid utilisations.

The CSR Committee will be responsible for monitoring approved projects/ programmes.

The monitoring system devised by the Company will include:

- i. Regular field visits to Projects/ Programme site by designated teams;
- ii. Comprehensive documentation/ compilation of Field Reports;
- iii. Regular interaction with beneficiary communities to obtain feedback;
- iv. Monitoring of timely fund utilisation to ensure that Projects/ Programmes as budgeted are actually carried out and/ or
- v. Any other activity that the CSR Committee may deem necessary in the larger interest of its CSR initiatives.

Impact Assessment/ Evaluation of CSR



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In order to assess the impact of its CSR Projects and Programmes, maximise outcomes and build-in sustainability, scalability and replicability, the Company shall ensure that the projects/ Programmes undergo concurrent and final evaluation.

Documentation

Meticulous documentation of projects/ programmes is the only way to ensure that progress is continuously tracked, course corrections are provided, lessons learnt and objective feedback received

Comprehensive documentation would include - printed material, audio recordings, video recordings etc. if any. This would also be of great value to the Company in brand building, market positioning, enhancing its competitive advantage and embedding CSR values within the organisation.

Accounting & Auditing

The Company will follow the Accounting and Auditing Guidance Note/ Standards duly approved by the Ministry of Corporate Affairs, Government of India.

Disclosure

The Company shall comply with Sections 135 (2), 135(4)(1) and 134 (3) (o) of the Act thereby ensuring that it makes a full disclosure of its CSR Policy, Strategy, Projects/ Programmes, Activities, monitoring mechanism, Implementing Agencies, Expenditure details as well as the composition of the CSR Committee of the Board.

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