
CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

MANILAM INDUSTRIES INDIA LIMITED

1. PREFACE

- 1.1 As This Corporate Social Responsibility (herein after referred to as 'CSR') Policy is framed in terms of the Companies Act, 2013 (hereinafter referred to as 'the Act') read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as 'the CSR Rules'), as amended from time to time.
- 1.2 The Company is driven by the philosophy of "Long Term" business partnership with Customers through market responsive approach and efficient service.
- 1.3 Every business has responsibility towards society and economy. It should work towards achieving growth of per capita income, employment as well assuming generous approach towards achieving social goals like education, health, sanitation, clean & pollution-free environment to enable the people to deliver their best. These activities are collectively termed as “CSR Activities”.
- 1.4 The Companies Act, 2013 has made it mandatory for profit making Companies to constitute the CSR Committee and spend at least 2% of its average net profit during the 3 immediate preceding financial years (block of 3 years). Accordingly, the Company has decided to carry out programmes, projects, and activities (collectively known as "CSR Activities") in this regard as the subject matter of this Policy, as specified in the Companies Act, 2013 and Rules relating thereto.
- 1.5 Where the amount required to be spent by a company on CSR does not exceed fifty lakh rupees, the requirement for constitution of the CSR Committee is not mandatory and the functions of the CSR Committee, in such cases, shall be discharged by the Board of Directors of the company.

2. CSR POLICY

The Company has undertaken Policy to direct its CSR programmes towards achieving activities as prescribed in Schedule VII of the Act but not limited to the following –

- i. Eradicating hunger, poverty and malnutrition, promoting healthcare 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 centers 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, agro-forestry, 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;

- 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 arts and handicrafts;
- 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 recognized 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 for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- ix. (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).
- x. Rural development projects;
- xi. 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.

- xii. disaster management, including relief, rehabilitation and reconstruction activities.

The Company can pursue any of the above mentioned activities as its social, economic and environmental responsibility.

3. IMPLEMENTATION

The Implementation of the CSR activities of the Company will be governed by the Board of Directors of the Company. The Company may also carry out its CSR Activities through any of the followings:

- i. Any other registered trust or a registered society or a Company established by the Company itself or its holding or subsidiary or associate Company under section 8 of the Companies Act, 2013 or otherwise.
- ii. Any registered trust or a registered society or section 8 Company having a track record of three years in undertaking similar projects, programs or activities, if the same is not established by the Company itself or its holding or subsidiary or associate Company.
- iii. The Company should ensure foregoing Trust or Society is registered with Ministry of Corporate Affairs before making contribution on or after 1st April, 2021.
- iv. The Company may also collaborate with other Companies for undertaking CSR project or programs or activities

4. SCOPE & TERMS OF REFERENCE

The terms of reference of the Board/ Committee (if any) are as follows:

- i. To formulate and recommend, a Corporate Social Responsibility (CSR) Policy related to the CSR activities to be undertaken by the Company as provided in the Schedule VII and any other related provisions, if any, of the Companies Act, 2013 and the rules made there under.
- ii. To institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company.
- iii. To recommend the amount of expenditure to be incurred on the CSR activities as per the requirement of the Companies Act, 2013 and the rules made there under.
- iv. To carry out such other functions as may from time to time, be authorized by the Board and/or required by any Statutory Authority, by the way of amendment and/or otherwise, as the case may be.

5. RESPONSIBILITY/ ROLE OF THE BOARD

The Board shall:

- a) Constitute CSR policy which shall include a list of CSR projects or programs which a company plans to undertake falling only within the purview of the Schedule VII of the Act, specifying modalities of execution of such project or programs and implementation schedules for the same and;
- b) Monitoring process of such projects or programs;
- c) To ensure and undertake the activities as per its CSR policy.

6. GOVERNANCE/ REPORTING

- 6.1 The Company shall specify the projects/ programmes to be undertaken by such an organization, modalities for utilizing funds provided by it.
- 6.2 The Company shall establish a monitoring mechanism to ensure that the allocation is spent for the intended purpose only and shall periodically monitor and evaluate the performance of the Projects and the achievement of targets.

- 6.3 The Board of a company shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the **Chief Financial Officer** or the person responsible for financial management shall certify to the effect.
- 6.4 In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.”
- 6.5 The Board will consider and approve the CSR Plan with such modification that may be deemed necessary; the CSR Plan may also be modified by the Board during the financial year.

The Company shall display the CSR Policy & Projects approved by the Board on its website.

6 UNSPENT CSR MONEY/ EXCESS CSR EXPENDITURE

- 6.1 CSR expenditure will include all expenditures, direct and indirect, incurred by the Company on CSR Program undertaken in accordance with the approved CSR Plan.
- 6.2 Any income arising from CSR Program will be netted off from the CSR expenditure and if in case any surplus arises, such amount will be reported as CSR surplus and used for CSR purpose only.
- 6.3 Expenditure on CSR capacities (of the Co’s personnel or implementing agencies) shall not exceed 5% of the total CSR expenditure in a financial year.
- 6.4 If CSR expenditure in a financial year exceeds the statutory limit, such excess may be set-off against CSR expenditure within next three financial years with the approval of the Board.
- 6.5 In case the Company is not able to spend the money earmarked for CSR expenditure and any income/surplus arising out of the CSR activities, it shall transfer such fund as may be notified in Schedule VII in the following manner –
- A. where the unspent amount is related to an Ongoing Project, such unspent amount shall be transferred to the ‘Unspent Corporate Social Responsibility Account’ within a period of 30 days from the end of the financial year and the same shall be spent within a period of three financial years from the date of such transfer in the manner as prescribed in section 135(6) of the Act and the Rules, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.; and
 - B. Where the unspent amount is not related to an Ongoing Project, such unspent amount shall be transferred to a Fund as may be specified in Schedule VII, within a period of six months of the expiry of the financial year or such other time period as permissible under the Applicable Law.
- 6.6 The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year. Expenditure on CSR capacities (of the Co’s personnel or implementing agencies) shall not exceed 5% of the total CSR expenditure in a financial year.

The Board of Directors are empowered to review this policy periodically and may amend or modify the Policy accordingly, from time to time.

**By and on Behalf of Board of Directors
For Manilam Industries India Limited**

**Sd/-
Manoj Kumar Agrawal
(Managing Director)
DIN: 00067194**
