

## CSR POLICY

### **INTRODUCTION**

Pursuant to Section 135 of the Companies Act, 2013 (the Act) read with the Companies (CSR Policy) Rules, 2014 (the Rules), the Company put in place a CSR Policy for the Company as per approval given by the Board of Directors of the Company at its meeting held on 15/06/2020. The said Act and Rules in this regard have been substantially amended with effect from 22<sup>nd</sup> January 2021, necessitating changes to be made in the CSR Policy.

Accordingly, a Policy has been framed for adoption by the Board of Directors incorporating the necessary changes. This Policy shall come into immediate effect.

Company operates in a manner that not just continues to generate an attractive return for shareholders, but also minimizes our impact on the environment and helps in replenishing the planet; while lending a helping hand to the community.

### **Our CSR Vision**

Through sustainable measures, actively contribute to the Social, Economic and Environmental Development of the community in which we operate, ensuring participation from the community and thereby creating value for the nation.

### **Our CSR Mission**

Ensuring socio-economic development of the community through different participatory and need- based initiatives in the best interest of the poor and deprived sections of the society so as to help them to become SELF-RELIANT and build a better tomorrow for themselves.

The Company's CSR is in alignment with the focus initiatives – health, education, environment, women empowerment, infrastructure, rural development, community development and response to natural calamities.

The Policy outlines the company's responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking activities for welfare & sustainable development of the community at large.

### **OUR ACTIVITIES**

The CSR activities we pursue will be in line with our stated Vision and Mission, focused not just around our offices, but also in other geographies based on the needs of the communities.

The four focus areas where special Community Development programmes would be run are:

#### **1. Eradicating hunger, poverty and malnutrition:**

- Provision of food, nutrition supplement, clothes etc. for the poor, children and other deprived sections of the society.
- Promoting sanitation, making available safe drinking water
- Promoting Health care through awareness programmes, health check-ups, provision of medicine & treatment facilities, providing pre-natal & post-natal healthcare facilities, programmes for preventing diseases and building immunity. To provide medical equipment through NGO's like sick beds, wheel chairs, oxygen cylinders etc. at home for sick people in need. To support NGO's in conducting Blood Donation camps.

## **2. Ensuring environmental sustainability and ecological balance through:**

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

## **4. Promotion of education** especially among children, women, elderly and the differently abled including:

- Non-formal education programmes.
- Supporting schools with infrastructure like benches, toilets, potable water, fans etc.
- Supporting other educational institutions.
- Improving educational facilities in general.
- Supporting children for higher education.

## **5. Rural Development Projects**

### **6. Promoting gender equality and empowering women** including:

- Adult literacy for women.
- Promoting and providing credit support to women's self-help and joint liability groups.
- Training in vocations pursued by women.
- Supporting in setting up homes for women & orphans;
- Supporting in setting up old-age homes & other facilities for senior citizens
- Supporting in setting up hostels for working and student women, day care centres for children of working women.

### **7. Other Activities:**

- Promotion of Sports with special focus on training for rural sports, nationally recognised sports, Paralympic sports, Olympic sports.
- Welfare for differently abled persons
- Setting up public libraries
- Reducing inequalities faced by the socially and economically backward groups
- Protection of national heritage, art, culture and handicraft; Restoration of Buildings & sites of historical importance & works of art.
- Welfare of armed forces personnel, war widows and their dependants
- While selecting the activities to be carried out, the Company in addition to the points mentioned above, would also take into account the legal provisions contained in Section 135 and Schedule VII of the Companies Act, 2013 and the rules made thereunder. Further, the Company would consider the well-recognized National and International Goals and as may be recommended by the CSR Committee of the Board and as approved by the Board from time to time.
- Such other activities as the Board may consider being appropriate.

## **MODALITIES OF EXECUTION & IMPLEMENTATION**

### **1. Board**

Board will inter alia do the following:

- Approve the CSR Policy of the Company and make necessary disclosures.
- Ensure that the CSR activities are undertaken by the Company as per Annual Action Plan and as required under law, taking into account the approved timelines, year-wise allocation etc.
- Ensure spending of 2% of Net profits.
- Ensure that the CSR activities are undertaken directly or through the entities specified in the applicable Rules.
- Approve the Annual Report on CSR with the prescribed disclosures and reports & place the same on the Company's website as required under law.
- And generally comply with the provisions of law on CSR.
- Formulate and recommend to the Board an Annual Action Plan in pursuance of a CSR Policy.
- Recommend to the Board the amount of expenditure to be incurred on CSR activities.

### **2. CSR Committee:**

CSR Committee will inter alia do the following:

- Formulate and recommend to the Board a CSR Policy for the Company.
- Monitor the implementation of the CSR Policy of the Company from time to time.
- Review the CSR projects / initiatives from time to time.

### **3. CSR Team:**

CSR Team will have the following responsibilities:

- The CSR activities shall be implemented by the CSR Team appointed by the senior management of the Company.
- Implementation will be done as per the requirement of the project or programme. As per the specific requirements of the activity, the schedule of a project may be over a multi-year duration as well.
- The CSR Team may also work with any NGO or institution to design and implement innovative projects independently or through partnership between institutions/trust.
- The time period/duration over which a particular programme will be spread, will depend on its nature, extent of coverage and the intended impact of the programme.
- The process for implementation of CSR programs will involve the identification of programs, area of CSR activities, project-based approach, time period, cost of the project etc.
- All proposals under CSR activity would be first referred to the CSR Team. After evaluation, the CSR Team may put forward the proposals of CSR along with their comments to the Committee. Appropriate technology will be leveraged to facilitate the functioning of the CSR team.

### **4. CSR Vehicle:**

- CSR activities will be undertaken either by the Company directly or through a Section 8 Company/registered Public Trust or a registered Society, having such registrations as required under the said Act/Rules.
- Where such an entity is not established by the company, its track record in undertaking similar programs or projects would be considered while granting any contribution.
- The Company will specify the project or programme to be undertaken through these entities, the modalities of utilization of funds on such projects or programs and the monitoring and reporting mechanism.

- The Company may also collaborate with other companies for undertaking projects or programs 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 the prescribed CSR Rules.
- The Company may build CSR capacities of its own personnel as well as those of the implementing agencies through institutions with established track records, subject to the prescribed CSR Rules.

## MONITORING AND ASSESSMENT

- **Release of funds for CSR Project/Programme:** The amounts sanctioned for a CSR project or programme, will be released in full or in stages or installments as per progress, as may be determined by the CSR Committee. CSR Committee may design the procedure/ guidelines applicable from time to time and release of funds to any project in a year shall be as per the guidelines finalized by the CSR Committee.
- **Review by Board / CSR committee:** On a periodical basis, the Board of Directors, CSR Committee will review the implementation of CSR.
- **Utilisation Certificate:** Funds released/to be released to the implementing agency would be generally based on satisfactory utilization certificate duly certified by an authorized officer / CEO / CFO of the donee entity and satisfactory performance report submitted by the said person, as may be decided by the CSR Committee.
- **External Agency assessment:** The impact assessment/evaluation of major projects may be carried out by an external agency to critically assess the fulfillment of project objectives, subject to the applicable CSR Rules.
- **Audit:** The amount spent on CSR by the Company will be subject to audit as may be determined by the CSR Committee and as per applicable laws.
- **Reporting in the Annual Report of the Company:** The Company shall include an annual report of its CSR activities undertaken for the financial year in its Board's Report as per the format prescribed under the Companies (Corporate Social Responsibility Policy) Rules, 2014.

## GUIDING PRINCIPLES FOR FORMULATION OF ANNUAL ACTION PLAN

- The CSR Committee shall formulate and recommend to the Board every year an Annual Action Plan (AAP) in pursuance of this Policy.
- The AAP will list down the CSR projects or programs to be undertaken by the Company in the areas or subjects mentioned in Schedule VII of the Act.
- Execution of such projects or programs shall be done directly or through any of the entities specified in the applicable Rules.
- AAP will contain provisions regarding the modalities of utilization of funds and implementation schedules for the projects or programs.
- AAP will contain details of need and impact assessment as may be considered necessary for the projects to be undertaken by the Company and as per applicable laws.
- AAP will be subject to review and revision from time to time by the CSR Committee or Board, based on reasonable justification for the same.

## **GENERAL**

The CSR Policy referred to above is to be read in conjunction with the Companies Act, 2013 and Companies (CSR Policy) Rules, 2014, as amended from time to time.

This Policy is subject to review from time to time.

For **DEON TAPES INDUSTRIES PRIVATE LIMITED**

Jignesh Doshi  
Director  
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