



NATRINAI VENTURES LIMITED

Corporate Social Responsibility Policy (Adopted by the Board of Directors on January 31, 2025)

CIN: U40100TZ2015PLC021605

Registered Address: No.114, E4, 4th Floor, Sreemathi Mariammal Towers, Race Course, Coimbatore Racecourse,
Coimbatore, Coimbatore South, Tamil Nadu, India, 641018

CSR POLICY

Preamble

Natrinai Ventures Limited (“the Company” or “Natrinai”) through the recommendations made by the Corporate Social Responsibility Committee (‘CSR Committee’) has developed a Corporate Social Responsibility Policy (hereinafter to be referred as ‘CSR Policy’) in alignment with its objective, principles and values, for delineating its responsibility as a socially and environmentally responsible corporate citizen.

Policy Statement

Corporate Social Responsibility (“CSR”) at Natrinai portrays a deep symbiotic relationship that the Company enjoys with the communities it is engaged with. As a responsible corporate citizen, Natrinai believes in incorporation of a holistic CSR perspective within Company’s strategic planning and core operations so that the Company is managed in the interest of a broad set of stakeholders, particularly the community, to achieve maximum economic and social value over the medium to long term. Natrinai remains committed to touch the marginalized section of the societies through its focused CSR initiatives. The Company aims to integrate CSR activities into its business operations leading to alignment of business growth with sustainability of the social and environmental fabric of the end communities.

Legal Framework of CSR Policy

Section 135 of the Companies Act 2013 (hereinafter referred to as the Act), effective from 01.04.2014 read with Schedule VII of the Act and the Companies (Corporate Social Responsibility Policy) Rules 2014, as amended from time to time, lays down the legal framework for the Company’s CSR policy.

Definition and Interpretation

1. **“Act”** means The Companies Act, 2013 including any statutory modification or re-enactment thereof;
2. **“Administrative overheads”** means the expenses incurred by the company for ‘general management and administration’ of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.
3. **“Board”** means the Board of Directors of the Company
4. **“Company”** means **Natrinai Ventures Limited**
5. **“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 these rules, but shall not include the following, namely:-
 - (i) activities undertaken in pursuance of normal course of business of the company;

Provided that any company engaged in research and development activity of new vaccine, drugs and



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new medical devices in their normal course of business may undertake research and development activity of vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that-

- (a) such research and development activities shall be carried out in collaboration with any of the institutes or organisations mentioned in item (ix) of Schedule VII to the Act;
 - (b) details of such activity shall be disclosed separately in the Annual report on CSR included in the Board's Report;
 - (ii) any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
 - (iii) contribution of any amount directly or indirectly to any political party under section 182 of the Act;
 - (iv) activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
 - (v) activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
 - (vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India;
6. **"CSR Activities"** means such programmes and projects as may be approved by the Board in terms of this CSR Policy.
7. **"CSR Committee"** means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act;
8. **"CSR Policy"** means a statement containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan;
9. **"CSR Rules"** means the Companies (Corporate Social Responsibility Policy) Rules, 2014 issued by Ministry of Corporate Affairs, as amended from time to time.
10. **"CSR Expenditure"** means the amount recommended by the CSR Committee to be incurred on the CSR Activities in India in terms of the Act and the CSR Rules as approved by the Board from time to time.
11. **"Director"** means a member of the Board of the Company.
12. **"Net Profits"** means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:-
- (i) any profit arising from any overseas branch or branches of the Company (whether operated as a separate company or otherwise); and
 - (ii) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act;



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13. **"Ongoing Project"** means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification;

Words and expressions used and not defined in this policy but defined in the Act and/or CSR Rules shall have the same meanings respectively assigned to them in the Act or CSR Rules.

Scope & Applicability

This policy shall be applicable to all CSR initiatives and activities undertaken by Natrinai Ventures Limited either directly or through entities as mentioned in Rule 4 of the Companies (Corporate Social Responsibility) Rules, 2014 for the benefit of different segments of the society.

Policy Objective

The objective of this policy is:

- (a) To set guiding principles for carrying out CSR activities by the Company
- (b) To recognize and frame the segments the Company shall chase towards achieving its CSR objectives
- (c) To formulate the execution, implementation and monitoring of the CSR activities to be undertaken by the Company.
- (d) To initiate projects that benefit communities
- (e) To generate goodwill in communities where Natrinai operates or are likely to operate

Governance Structure

The Company has a well-defined and robust governance structure to oversee the implementation of the CSR Policy, in compliance with the requirements of Section 135 of the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014.

- A. Board of Directors
- B. CSR Committee



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CSR Budget and CSR Expenditure

1. The Board shall ensure that at least 2% of the average net profit calculated as per Section 198 of the Act read with CSR Rules (average net profit) accrued during the three immediately preceding Financial Years is allocated and made available for application towards the CSR Activities and the same is spent in each financial year on CSR initiatives to be undertaken by the Company in accordance with the Act and the Rules and the CSR Policy.
2. All expenditure towards the CSR Projects / Programs to be diligently documented and the Board shall ensure that the administrative overheads shall not exceed 5% of total CSR expenditure of the Company for the financial year.
3. Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company and shall only be re-allocated to the CSR Activities being undertaken in pursuance of this CSR Policy and the annual action plan of the Company or such surplus amount arising out of the CSR Activities be transferred to a Fund specified in Schedule VII, within a period of 6 months of the expiry of the financial year.
4. In an event where CSR expenditure is in excess of requirement as provided under Section 135 of the Act, such excess amount may be set off up against the requirement to spend as per Section 135 of the Act, up to immediate succeeding three financial years⁹ subject to the conditions that –
 - a) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any; and
 - b) the Board of the Company shall pass a resolution to that effect.

Treatment of unspent CSR amount

In the event the Company fails to spend the required amount in its entirety earmarked for CSR activities in a particular financial year, the treatment of unspent CSR amount shall be as under:

(a) In case unspent amount not relating to ongoing Project:

- The Board of Directors in their Annual Report pertaining to that particular Financial Year shall specify the reasons for not spending the amount; and
- The Company shall transfer such unspent amount to a Fund specified in Schedule VII, within a period of 6 (Six) months of the expiry of the said financial year.

(b) In case unspent amount relating to any ongoing Project or in case the project undertaken is to be considered as an ongoing project:

- The Company shall pass a Board Resolution to approve the project as “on-going” if it has not been already identified as an ongoing project;



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- The Company shall open a special account for that financial year in any scheduled bank to be called “Unspent Corporate Social Responsibility Account” and transfer such unspent amount on approved CSR project within a period of 30 (Thirty) days from the end of that financial year to above mentioned account;
- The Company shall spend such amount within a period of 3 (Three) financial years from the date of such transfer to the “Unspent Corporate Social Responsibility Account” of the Company to ensure completion of the project in pursuance of its obligation towards the Corporate Social Responsibility Policy.
- If after completion of third financial year also the amount remains unspent, the company shall transfer the same to a Fund specified in Schedule VII, within a period of 30 (Thirty) days from the date of completion of the third financial year.

Territory for CSR spending

The Company shall give preference to the local areas around its operations for spending the amount earmarked for CSR activities for the benefit of marginalized, deprived and underprivileged sections of the society, however not limited to Tamil Nadu but can be extended/covered in other parts of India region.

CSR Focus Areas

1. The Company shall undertake CSR Projects / Programs that are aligned with areas listed in Schedule VII of the Act, within the geographical limits of India, for the benefit of marginalized, disadvantaged and underserved sections of the community. The Board shall ensure that the CSR Projects / Activities that are undertaken by the Company should be within the scope of the following activities:

- (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, woman, 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, 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;



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- (vi) Measures for the benefit of armed forces veterans, war windows 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 social-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 purpose 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 law for the time being in force;
 - (xii) Disaster management including relief, rehabilitation and reconstruction activities; and
 - (xiii) Any other project as may be specified under Schedule VII of the Companies Act, 2013, from time to time.
2. The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely: -
- (i) The list of CSR projects or programmes to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - (ii) The objectives and expected results of the CSR Activity;
 - (iii) The relevant sector and the nature of the CSR Activity;
 - (iv) The location for implementation of the CSR Activity;
 - (v) The manner of execution – whether the CSR Activity should be undertaken directly or by any Implementing Agency or in collaboration with any other company;
 - (vi) The modalities of utilisation of funds and amount to be allocated towards the CSR Activity;
 - (vii) The implementation schedules for the projects or programmes with indicative timelines for completion of the CSR Activity;
 - (viii) The manner of execution – whether the CSR Activity should be undertaken directly or by any Implementing Agency or in collaboration with any other company;
 - (ix) Monitoring and reporting mechanism for the projects or programmes;
 - (x) details of need and impact assessment, if any, for the projects undertaken by the company; and



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- (xi) Such other details as it may deem necessary.
3. The Board shall approve the CSR activities of the Company for a given financial year that may be undertaken by the Company, based on the recommendations of the CSR Committee.

Activities not to be counted as CSR by the Company

1. Activities undertaken in pursuance of normal course of business of the company;
2. Any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
3. Contribution of any amount directly or indirectly to any political party under Section 182 of the Act;
4. Activities benefitting employees of the company as defined in clause (k) of Section 2 of the Code on Wages, 2019 (29 of 2019);
5. Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services; and
6. Activities carried out for fulfilment of any other statutory obligations under any law in force in India.

Role and Responsibility of the Board of Directors

The role and responsibility of the Board of Directors ("Board") shall be as under:

- (a) To ensure that the CSR Committee is formed as per relevant provisions of the Act
- (b) To ensure that the CSR Committee is functioning as per the defined roles.
- (c) To approve the CSR Policy recommended by the CSR Committee after making modifications as the Board may deem fit;
- (d) To disclose the contents of such policy in its report ("Board Report") and also place it on the Company's website;
- (e) To ensure that the amount sanctioned for the CSR Expenditure is available to the CSR Committee for application towards the CSR Activities.
- (f) To ensure that the activities proposed in the CSR Policy are undertaken;
- (g) To ensure that the Company spends, in every financial year, at least 2% of average net profits of the Company made during the 3 immediately preceding financial years, as required under Section 135 of the Act and the CSR Rules;
- (h) In the event the Company fails to spend the sum as mentioned above, then the Board shall, in its Board Report specify the reasons for not spending the amount.

CSR Committee

1. Constitution

The CSR Committee will comprise of all the directors on the Board of the Company. The



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composition of the CSR Committee is presently as follows:

Name of the Director	Designation	Member / Chairman
Mr. Ezhil Govindasamy	Non – Executive Director	Chairman
Mr. Dinesh Kumar Venkatachalam	Independent Director	Member
Mr. Eazil Sudharman	Wholetime Director & CEO	Member
Mr. Eazil Sathyanthan	Managing Director	Member

2. Meetings

- (i) The CSR Committee shall meet at such times as the Chairman of the CSR Committee deems appropriate.
- (ii) The meeting shall be held either at the registered office of the company or any other place, as may be decided by the members.
- (iii) The Committee shall meet in person or through video conferencing or other audio visual means, in accordance with the procedure prescribed in the Companies (Meetings of Board and its powers) Rules, 2014 as amended and Secretarial Standard on Meetings of the Board of Directors issued by the Institute of Company Secretaries of India (ICSI).
- (iv) The Members of the Committee shall not be paid any sitting fees for attending meetings of the Committee.
- (v) The minutes of the meetings of the CSR Committee shall be recorded and maintained in accordance with the relevant provisions of the Companies Act, 2013, as amended and Secretarial Standard on Meetings of the Board of Directors issued by the ICSI.

3. Quorum

The quorum for meetings of the CSR Committee shall be at either two members or one-third of the members of the CSR Committee, whichever is higher.

4. Invitees

The CSR Committee may invite any representative of the implementing agency or expert consultant, as it considers appropriate to attend and participate at its meetings.

5. Notice, circulation of agenda, supporting papers and resolutions

All notices to the CSR Committee will be in accordance with the Companies Act, 2013. The agenda papers along with requisite supporting documents and resolution shall be sent to all Members at least seven (7) days before the relevant meeting, which may be waived by the Members through a shorter

notice consent by a simple majority of the Members. A resolution proposed to be passed by circulation should be sent, together with necessary papers, to all the Members.

6. Role

The terms of reference of the CSR Committee will be –

- (i) To formulate and recommend to the Board, a corporate social responsibility policy stipulating, amongst others, the guiding principles for selection, implementation and monitoring the activities as well as formulation of the annual action plan, which shall indicate



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the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act and the rules made thereunder and make any revisions therein as and when decided by the Board;

- (ii) To review and recommend the amount of expenditure to be incurred for the corporate social responsibility activities, being at least two-percent of the average net profits of the Company made during the three immediately preceding financial years in pursuance of its corporate social responsibility and the distribution of the same to various corporate social responsibility programmes undertaken by the Company;
- (iii) To identify corporate social responsibility policy partners and corporate social responsibility policy programmes;
- (iv) To formulate and recommend to the Board, an annual action plan in pursuance to the corporate social responsibility policy, including any modifications thereof which shall include the following, namely:
 - (a) the list of corporate social responsibility projects or programmes that are approved to be undertaken in areas or subjects specified in the Schedule VII of the Companies Act, 2013;
 - (b) the manner of execution of such projects or programmes as specified in Rule 4(1) of the Companies (Corporate Social Responsibility Policy) Rules, 2014;
 - (c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - (d) monitoring and reporting mechanism for the implementation of the projects or programmes; and
 - (e) details of need and impact assessment, if any, for the projects undertaken by the company.

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Provided that the Board may alter such plan at any time during the financial year, as the recommendations of the Corporate Social Responsibility Committee, based on reasonable justification to that effect.

- (v) Identifying and appointing the corporate social responsibility team of the Company and delegate responsibilities to such team and supervise proper execution of all delegated responsibilities;
- (vi) To review and monitor the Corporate Social Responsibility Policy of the company and its implementation from time to time, and issuing necessary directions as required for proper implementation and timely completion of corporate social responsibility programmes;
- (vii) To take note of the compliances made by implementing agency (if any) appointed for the corporate social responsibility of the Company;
- (viii) To perform such other duties and functions as the Board may require the corporate social responsibility committee to undertake to promote the corporate social responsibility activities of the Company and exercise such other powers as may be conferred or perform such responsibilities as may be required by the corporate social responsibility committee in terms of the provisions of Section 135 of the Companies Act;
- (ix) Any other matter as the Corporate Social Responsibility Committee may deem appropriate after approval of the Board or as may be directed by the Board from time to time and/or as may be required under applicable law, as and when amended from time to time.

7. Minutes of Committee Meetings:



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Proceedings of all CSR Committee meetings must be maintained in form of minutes and signed by the Chairman of the Committee and tabled at the subsequent Board and CSR Committee meeting,

Implementation of the CSR Policy

1. The Company may carry out the CSR Activities either directly or by partnering with any of the following entities (as **"Implementation Agencies"**)
 - (i) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12-A and 80-G of the Income Tax Act 1961, established by the Company, either singly or along with any other company; or
 - (ii) a company established under section 8 of the Act, or a registered trust or registered Society, established by the Central Government or State Government; or
 - (iii) any entity established under an act of Parliament or a State Legislature; or
 - (iv) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12-A and approved under Section 80-G of the Income Tax Act 1961, and having an established track record of at least three years in undertaking similar CSR activities;
2. The Company shall conduct due diligence and evaluate the credentials prior to selection of an entity as its implementation agency and seek relevant documents, information and details as per **Annexure A** of this Policy to ensure that the proposed implementation agency is eligible and capable to be appointed as such.
3. The Board shall negotiate, finalize, approve and execute appropriate memorandum of understanding, agreements, deeds, writings, confirmations, undertakings or any other documents, as may be necessary, under the Common Seal of the Company or otherwise, on behalf of the Company with eligible Implementing Agencies for the purposes of the CSR Policy and accept modifications, changes and amendments to any such documents / agreements as it may deem fit.
4. The Company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the Board of respective companies are in a position to report separately on such projects or programmes in accordance with these rules.
5. The Board shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it.
6. The Board shall be responsible for implementing the mandate of the CSR Policy and shall ensure that the CSR Activities are carried out in accordance with the CSR Policy read with the Act and CSR Rules and the annual action plan formulated by the Board.
7. The appropriate documentation of the implementing agencies shall be undertaken on a regular basis.

Monitoring Process



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1. The Board shall ensure that a transparent monitoring mechanism is put in place in such manner as it deems fit to ensure that each programs, projects and activities undertaken has targets, timelines and measurable parameters, wherever possible.
2. CSR spends will be closely monitored to ensure that funds are released against verified utilizations as per the approved work plans. The utilization of the amount sanctioned towards CSR Activities should be reported to the Chairman of the Board in such manner as the Board may direct.
3. All projects undertaken by the Company shall be monitored on a regular basis. Regular field visits, comprehensive documentation and interaction with beneficiary communities will be undertaken, as may be considered necessary for monitoring to ensure on-track implementation.
4. In the event any of the CSR Activities are undertaken through an Implementing Agency, the Board shall determine the manner of submission of information, reports, files, etc. by the Implementation Agency as a part of the monitoring process. For the purposes of monitoring, the Board may authorise its representative to also visit the Implementation Agency site to review CSR project, obtain relevant information and carry out inspections from time to time. The Board, on receipt of such information and progress report, may review and deliberate upon such information & reports.
5. In case of ongoing project, the Board 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. CSR spends will be audited in an accountable and transparent manner.

CSR Reporting

- a) The Board's report of the Company pertaining to any financial year shall include an annual report on CSR containing particulars set out in **Annexure B** to this CSR Policy and such other details as may be prescribed from time to time under the Act and the CSR Rules.
- b) In case of failure to ensure the minimum CSR Expenditure i.e. 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years, detailed reasons for the same should be submitted by the Board and the same shall be included in the board of directors report.

Disclosure

The Board will be responsible to ensure that the contents of the CSR Policy, and projects approved by the Board are also made available on the website of the Company.

Amendments to the CSR Policy

CSR Policy may be updated to align it with the changing requirement or changes in the legal and regulatory framework. Any revision in the Policy shall be approved by the Board.



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Effective Date

The CSR Policy shall be effective from the date of its approval by the Board of Directors in their meeting held on dated **January 31, 2025**.

For NATRIMIA VENTURES LIMITED,



WHOLE-TIME DIRECTOR & CEO
DIN : 07261887

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ANNEXURE – A

Indicative list of aspects to be considered while engaging with other entities as Implementing Agencies

1. Due diligence of the implementing agency would be conducted to check the credentials of the organization. The following information from the interested implementing agencies would be sought, as relevant:
 - i. Registration with the Central Government and having a unique CSR Registration Number;
 - ii. Memorandum/Article of Association or Constitution;
 - iii. Registration Certificate;
 - iv. Registration Certificate under Section 12A;
 - v. Audited Accounts (last three years);
 - vi. IT Exemption Certificate under Section 80G;
 - vii. PAN Card;
 - viii. IT Exemption Certificate under Section 35(i), if available;
 - ix. Acknowledgement of Income Tax Return along with IT Return filed (last three years);
 - x. Description of the project.
2. Ensure that the project/ programme is consistent with list of activities in Schedule VII.
3. The team may visit and/or meet the representatives to assess the organization (as required).
4. Quarterly reporting on the progress in implementation of the projects/ programmes and utilization of the amounts.
5. Reserving the rights, to be exercised at its sole discretion, of stopping the funding at any stage of the project, if the program is not being implemented as per program objectives and goals.



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ANNEXURE – B

FORMAT FOR THE ANNUAL REPORT ON CSR ACTIVITIES TO BE INCLUDED IN THE BOARD'S REPORT

1. Brief outline on CSR Policy of the Company.

2. Composition of CSR Committee:

Sl. No.	Name of Director	Designation/Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year

3. Provide the web-link where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company.
4. Provide the executive summary along with web-link(s) of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of Rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, if applicable.
5. (a) Average net profit of the company as per sub-section (5) of Section 135.
(b) Two per cent of average net profit of the company as per sub-section (5) of Section 135
(c) Surplus arising out of the CSR projects or programmes or activities of the previous financial years.
(d) Amount required to be set off for the financial year, if any
(e) Total CSR obligation for the financial year [(b) + (c) – (d)].
6. (a) Amount spent on CSR Projects (both Ongoing Project and other than Ongoing Project).
(b) Amount spent in Administrative Overheads.
(c) Amount spent on Impact Assessment, if applicable.
(d) Total amount spent for the Financial Year [(a)+(b)+(c)].
(e) CSR amount spent or unspent for the financial year:

Total Amount Spent for the Financial Year. (in Rs)	Amount Unspent (in Rs)				
	Total Amount transferred to Unspent CSR Account as per sub-section (6) of Section 135		Amount transferred to any fund specified under Schedule VII as per second proviso to sub-section (5) of Section 135		
	Amount	Date of transfer	Name of the Fund	Amount	Date of transfer

(f) Excess amount for set off, if any

Sl. No.	Particular	Amount (in Rs)
(1)	(2)	(3)
(i)	Two per cent of average net profit of the company as per sub-section (5) of Section 135	



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(ii)	Total amount spent for the Financial Year	
(iii)	Excess amount spent for the financial year [(ii)-(i)]	
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any	
(v)	Amount available for set off in succeeding financial years [(iii)-(iv)]	

7. Details of Unspent Corporate Social Responsibility amount for the preceding three financial years:

1	2	3	4	5	6		7	8
Sl. No.	Preceding Financial Year(s)	Amount transferred to Unspent CSR Account under sub-section (6) of Section 135 (in Rs.)	Balance Amount in Unspent CSR Account under sub-section (6) of Section 135 (in Rs.)	Amount Spent in the Financial Year (in Rs.)	Amount transferred to a Fund as specified under Schedule VII as per second proviso to sub-section (5) of Section 135(6), if any		Amount remaining to be spent in succeeding financial years. (in Rs)	Deficiency, if any
					Amount (in Rs.)	Date of Transfer		
1	FY – 1							
2	FY – 2							
3	FY – 3							

8. Whether any capital assets have been created or acquired through Corporate Social Responsibility amount spent in the Financial Year:

☐ Yes ☐ No If Yes, enter the number of Capital assets created/acquired

Furnish the details relating to such asset(s) so created or acquired through Corporate Social Responsibility amount spent in the Financial Year:

Sl. No.	Short particulars of the property or asset(s) [including complete address and location of the property]	Pincode of the property or asset(s)	Date of creation	Amount of CSR amount spent	Details of entity/ Authority/ beneficiary of the registered owner		
(1)	(2)	(3)	(4)	(5)	(6)		
					CSR Registration Number, if applicable	Name	Registered Address



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(All the fields should be captured as appearing in the revenue record, flat no, house no, Municipal Office/Municipal Corporation/ Gram panchayat are to be specified and also the area of the immovable property as well as boundaries)

9. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per sub-section (5) of Section 135

Sd/- (Chief Executive Officer or Managing Director or Director)	Sd/- (Chairman CSR Committee)	Sd/- [Person specified under clause (d) of sub-section (1) of Section 380 of the Act] (Wherever applicable).]
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