

CORPORATE SOCIAL RESPONSIBILITY POLICY

(Pursuant to section 135 of Companies Act, 2013)

1. Introduction

The Companies Act, 2013 (“Act”) read with the Companies (Corporate Social Responsibility) Rules, 2014 (“CSR Rules”) introduced specific provisions relating to Corporate Social Responsibility. The Act and the Rules have also laid down the criteria for complying with the provisions relating to CSR, nature of projects, programmes and activities that can be undertaken as CSR activities, manner in which CSR activities shall be undertaken, constitution of CSR Committee, formulation of CSR Policy etc. Accordingly, the Board of Directors (the “Board”) of Entremonde Polycoaters Limited has adopted a Policy and standard operating procedures to undertake projects, programmes and activities relating to CSR.

2. Applicability and Effective Date

This Policy shall apply to all CSR activities and initiatives undertaken by the Company for the benefit of different segments of the society. This Policy shall be effective from 01st April 2021.

3. Philosophy

Company being a responsible corporate citizen strives to bring about overall positive impact in societies/local communities living in cities where it has business footprint. It is a deeply committed corporate citizen with its strategies, policies and actions aligned with wider social concerns, through initiatives in areas like education, skill training and other socially relevant areas. The Company believes in making a holistic impact on the communities in which it operates.

4. Definitions

“Act” means the Companies Act, 2013.

“Company” means the Entremonde Polycoaters Limited.

“Chairman” means Chairman of CSR Committee.

“CSR Committee or Committee” means Corporate Social Responsibility Committee of Board of Directors of the Company constituted under Section 135 of Companies Act, 2013.

“Board” means Board of Directors of the Company.

“Policy” means Corporate Social Responsibility Policy.

5. (A) Scope of CSR Activities

Company shall undertake following CSR projects related to the list of activities prescribed under Schedule VII of the Companies Act, 2013 read with Rules made thereunder, as amended from time to time:

- A. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- B. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- C. 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;
- D. 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;
- E. 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;
- F. Measures for the benefit of armed forces veteran, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- G. Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- H. 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;
- I. 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;
- J. 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)

K. Rural development projects;

L. 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.

M. Disaster management, including relief, rehabilitation and reconstruction activities

B) POLICY GUIDELINES

Broad guidelines for implementation for CSR activities are:

1. As outlined in the Companies (Corporate Social Responsibility Policy) Rules, 2014, the Company may undertake CSR projects directly, or through a registered Trust or a registered society or a special purpose Company etc. It may also collaborate with other Companies for undertaking CSR projects.
2. The Company shall give preference to the local areas where it operates, for spending the amount earmarked for CSR activities.
3. The Company shall undertake the CSR projects or programs in accordance with the provisions of Section 135 read with Schedule VII of the Companies Act, 2013 and rules made thereunder, with the approval of Board of Directors on the recommendation of CSR Committee.
4. The Company would have expertise or will develop expertise, taking help from partners/ advisors as required, in the selected CSR activities to be able to execute the programs effectively, and add value to the Programs in addition to providing funds.
5. The Company will maximize opportunities for its employee participation in the selected CSR activities as volunteers to enable them to give back the society.
6. The Company will decide and manage implementation of the selected CSR activities in such a manner to achieve in maximum social good from each Rupee of its CSR spend.
7. The Company considers its CSR spend not as a charity or donation but as an important investment in the welfare of its stakeholders and for better future for the Company and society.
8. The Company will arrange to display its CSR Policy on the Company's Website.

6. Composition of the CSR Committee

The CSR Committee consists of three Directors as its members. The Board may change the composition of the Committee entirely at their discretion, after taking into consideration the statutory requirement.

The following Directors form a part of the Company's CSR Committee:

- Mr. Chandrakant M. Khetan
- Mr. Rajesh S. Khetan
- Mr. Sunil N. Tripathi

7. Responsibilities of the CSR Committee

The responsibilities of the CSR Committee shall include:

- Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken;
- Recommending the amount of expenditure for the CSR activities; and
- Monitoring CSR activities from time to time.

8. Governance of the CSR Committee

The CSR Committee shall undertake activities / initiatives in accordance with the provisions of the Companies Act, 2013 read with Rules made thereunder including any amendment(s) made thereto.

9. Reporting and Disclosures

Apart from the reporting requirement as mentioned herein above in the Policy, following regulatory disclosure shall be followed:

- Composition of the CSR Committee shall be disclosed in the Board Report;
- The Board Report shall include a report on CSR activities in prescribed format;
- If the Company fails to spend the prescribed amount, the Board shall, in its report specify the reasons for not spending the amount;
- The content of Policy shall be displayed on the Company's website if any and a link shall be provided in the Board's Report.

10. REVIEW & AMENDMENT OF POLICY

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 Government, from time to time.

Further the CSR policy will be reviewed from time to time and any changes or amendments, if necessary, will be recommended by the CSR Committee to the Board and shall be approved by the Board.

Activities not covered in the Policy if taken up will be within the prescribed activities listed in Schedule VII of the Companies Act, 2013 and amendments thereof to the Act with approval/ratification of CSR committee of the Board.