
CORPORATE SOCIAL RESPONSIBILITY POLICY
OF
ARISTOPLAST PRODUCTS PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

INTRODUCTION

Corporate Social Responsibility (“CSR”) at Aristoplast Products Private Limited (“Company”) portrays the deep symbiotic relationship that the Company as a good corporate citizen enjoys with the communities it is engaged with. Along with sustainable economic performance, environmental and social stewardship is also a key factor for holistic business growth. As a responsible corporate citizen, we try to contribute for social and economic development on regular basis. We believe that to succeed, an organization must maintain highest standards of corporate behaviour towards its employees, consumers and societies in which it operates. We are of opinion that CSR underlines the objective of bringing about a difference and adding value in our stakeholder’s lives.

The initiatives taken by the Company is in consonance with projects and programs relating to activities specified under Schedule VII to the Companies Act, 2013 (“Act”) and Section 135 of the Companies Act, 2013 including the Companies (Corporate Social Responsibility Policy) Rules 2014 (“CSR Rules”) as amended from time to time.

GOVERNANCE

Aristoplast Products Private Limited CSR Policy (“CSR Policy”) has been formulated in consonance with Section 135 of the Companies Act, 2013 read with the CSR Rules notified by the Ministry of Corporate Affairs, Government of India.

This Policy shall apply to all CSR projects / programmes undertaken by the Company in India as per the Companies Act, 2013.

VISION AND POLICY STATEMENT

Through sustainable measures, actively contribute to the social, economic and environmental development of the community in which the Company operates ensuring participation from the community and thereby create value for the nation.

The CSR Committee will annually recommend the CSR programmes and projects to the Board for its approval. The Board of Directors of the Company through its CSR Committee will plan and monitor the expenditure of CSR activities.

DEFINITIONS

“Act” means the Companies Act, 2013 (18 of 2013), as amended from time to time.

“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;

“Board” means the Board of Directors of the Company.

“Company” means ‘Aristoplast Products Private Limited’.

“CSR” means Corporate Social Responsibility 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 the CSR Rules.

“CSR Committee” means the Corporate Social Responsibility Committee of the Board referred to in Section 135 of the Act.

“CSR Rules” means Companies (Corporate Social Responsibility Policy), Rules 2014 and amendments thereon.

“CSR Policy” means this Policy.

“CSR Expenditure” shall include all expenditure including contribution to corpus, for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee.

“Net profit” shall have the meaning ascribed to it in the Act and the CSR Rules.

“NGO” means non-governmental organisation.

“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;

“Public Authority” means ‘Public Authority’ as defined in clause (h) of section 2 of the Right to Information Act, 2005 (22 of 2005);

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

CSR PROGRAMMES AND PROJECTS

The Company proposes to adopt one or more of the following CSR activities as prescribed by applicable laws, including Schedule VII of the Companies Act, 2013, as amended from time to time:

- i. To promote education, vocation, social, cultural, community welfare services literacy activities for mentally and physically challenged children in rural and urban areas, to provide opportunities to fulfill the needs of women, rural and tribal students and the deprived sections of society.
- ii. To promote literacy activities to people in villages, organizing school activities for mentally and physically challenged children in rural areas.

- iii. To provide guidance to the farmers in the field of agriculture in the rural areas.
- iv. To provide care and free veterinary medical services to the livestock, to take up activities like providing shelters to the needy, taking up of irrigation projects, sanitation facilities, and drinking water facilities.
- v. To promote development of all kind of outdoor and indoor sports activities, including coaching/training, providing better facilities, sports for improvement of health amongst the youth, ladies and children.
- vi. 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.
- vii. 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.
- viii. 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.

- ix. Disaster management, including relief, rehabilitation and reconstruction activities.
- The CSR activities shall be undertaken within the territory of the Republic of India
 - The Company's CSR projects and programmes will be undertaken by the Company by itself or through:
 - (a) a company established under Section 25 of the Companies Act, 1956 corresponding to Section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
 - (b) a company established under Section 25 of the Companies Act, 1956 corresponding to section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
 - (c) any entity established under an Act of Parliament or a State legislature; or

- (d) a company established under Section 25 of the Companies Act, 1956 corresponding to section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.
- The CSR projects and programmes may also be implemented through registered public charitable trusts, not-for-profit companies set up under Section 25 of the Companies Act, 1956 corresponding to Section 8 of the Companies Act, 2013) through recognized and reputed NGOs and similar entities.

CSR COMMITTEE

Constitution of the CSR Committee

Pursuant to Section 135 of the Companies Act 2013, and the amendments thereof the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The members of the CSR Committee shall be appointed by the Board of Directors of the Company. The CSR Committee shall constitute of at least two or more members from the Board.

The CSR committee shall hold at least one CSR Committee meeting in a financial year. The CSR agenda for the financial year shall indicate the activities to be undertaken for the financial year, and the expenditure to be incurred on the CSR programs and initiatives. The CSR Committee of the Board will govern and review CSR activities of the Company from time to time. The CSR Committee will recommend the Annual Business Plan for CSR to the Board for its approval. The Annual Business Plan will include resource requirements and allocation across interventions and locations as per the approved CSR Policy. The Annual Business Plan will include resource requirements and allocation across interventions and locations as per the approved CSR Policy.

Role of the CSR Committee

- The CSR policy and programs shall be implemented, managed and supervised by the CSR committee appointed by the Board.
- The CSR Committee shall comprise at least of such number of directors as is mandatorily required by applicable laws.
- The Committee shall inter alia:
 - Formulate and update the CSR Policy which will be approved by the Board;
 - Decide the CSR activities to be taken up by the Company in accordance with this Policy;
 - Decide the amount to be allocated for each project or activity;
 - Oversee and monitor the progress of the initiatives rolled out under this Policy; and

- Submit a report, to the Board on all CSR activities undertaken during the financial year
- The Committee shall meet at least once in a financial year.

RESPONSIBILITIES OF CSR COMMITTEE

The responsibilities of the CSR Committee include:

- Formulating and recommending to the Board of Director the CSR Policy and indicating activities to be undertaken;
- Recommending the amount of expenditure for the CSR activities
- Monitoring CSR activities from time to time; and
- Such other functions as the Board of Directors may deem fit

ROLE OF THE BOARD

- After taking into account the recommendations made by the CSR Committee, approve the CSR Policy for the Company;
- Ensure that the CSR activities included in this Corporate Social Responsibility Policy are undertaken by the Company;
- The Board of the Company may decide to undertake its CSR activities approved by the CSR Committee, through a registered trust or a registered society or a Company established under section 8 of the Act by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, or otherwise provided that if such trust, society or company is not established by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, it shall have an established track record of three years in undertaking similar programs or projects/activities;
- Ensure that in each financial year the Company spends at least 2% of the average net profits of the Company made during the three immediate preceding financial years, calculated in accordance with Section 198 of the Act, in pursuance of its CSR policy. Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the Company where it operates,

As per Section 135 of the Act, specify the reasons for under spending the CSR amount in the Board's Report and, unless the unspent amount relates to any Ongoing Project referred to in Section 135(6), transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

DISCLOSURE OF THE POLICY

The CSR policy recommended by the CSR Committee and approved by the Board shall be displayed on the Company's website and shall be disclosed in the Board's report as well.

CSR REPORTING

The Board Report of a Company shall include an Annual Report on CSR containing particulars specified in Annexure to the CSR Rules as per the prescribed format.

FINANCIAL OUTLAY AND IMPLEMENTATION FOR CSR ACTIVITIES

- Every year, the Company shall with the approval of its Board make a budgetary allocation for CSR activities/ projects for the year. The budgetary allocation will be based on the profitability of the Company and the requirements of applicable laws.
- CSR Expenditure:
 - (1) The Board shall ensure that the Administrative Overheads shall not exceed five percent of total CSR Expenditure of the Company for any financial year.
 - (2) Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
 - (3) Where the Company spends an amount in excess of requirement provided under Section 135(5) of the Act, such excess amount may be set off against the requirement to spend under Section 135(5) of the Act up to immediate succeeding three financial years subject to the conditions that -
 - (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance Rule 7(2) of the Rules.
 - (ii) the Board of the Company shall pass a resolution to that effect.
 - (4) The CSR amount may be spent by a Company for creation or acquisition of a capital asset, which shall be held by -
 - (a) a company established under Section 25 of the Companies Act, 1956 corresponding to Section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number under sub-rule (2) of rule 4; or
 - (b) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
 - (c) a Public Authority:

- The Company expects to spend the budgeted amount allocated for CSR activities/ projects planned for each financial year, within that year. If for any reason, the budget of a year remains unutilised, the CSR Committee and the Board of Directors will disclose the reasons for not being able to spend the entire budgeted amount on the CSR activities as planned for that year in the Board's Report and, unless the unspent amount relates to any Ongoing Project referred to in Section 135(6), transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- Any surplus arising out of the CSR activities, projects or programs shall not form part of the business profits of the Company.
- The CSR Activities would be chosen for implementation by the Company in compliance with the provisions of Section 135 read together with Schedule VII of the Companies Act, 2013.

MONITORING AND REPORTING FRAMEWORK

- The Company recognises that monitoring is critical for assessment of the progress as regards timelines, budgetary expenditure and achievement of targets. Monitoring maybe done periodically with the help of identified key performance indicators, the periodicity being determined primarily by the nature of key performance indicators.
- Monitoring will be done in project mode with continuous feedback mechanism, and recourse always available for mid-course correction in implementation, whenever required.
- The performance of the Company's CSR activities would be monitored on the basis of their achievement of annual targets and the utilization of their annual budgets for the activities planned and the targets set for each year.
- Implementation and monitoring of the CSR activities will be overseen by the CSR Committee. The monitoring and evaluation may be assigned by the CSR Committee to an independent external agency for the sake of objectivity and transparency.
- If the projects are being implemented by external agencies, the Company may in consultation with CSR Committee designate special executives for this purpose.

EXCLUSION FROM CSR

The following activity shall not form part of the CSR activities of the Company:-

- activities undertaken in pursuance of normal course of business of the Company;
- 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;
- contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- activities benefitting employees of the Company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);

- activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services;
- activities carried out for fulfilment of any other statutory obligations under any law in force in India;

GENERAL

- In case of any doubt with regard to any provision of this CSR Policy and also in respect of matters not covered herein, a reference should be made to the CSR Committee. In all such matters, the interpretation and decision of the CSR Committee shall be final.
- All provisions of the CSR Policy would be subject to revision/amendment in accordance with the applicable laws.
- The Company reserves the right to modify, cancel, add, or amend this CSR Policy.
- Minimum 2 (Two) members including one member of the Board shall constitute a quorum for the committee meeting.
- Proceedings of all meetings must be signed by the Chairman of the Committee and tabled at the subsequent Board and Committee meeting.

REVIEW OF THE POLICY

The CSR Committee shall review the CSR Policy from time to time based on the changing needs and make suitable modifications as may be necessary with the approval of the Board.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

FOR ARISTOPLAST PRODUCTS PRIVATE LIMITED

SD/-

Mr. Dinesh Sawla Bhavanji
Director
DIN: 00836110