

NEOSYM INDUSTRY LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

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INTRODUCTION

Corporate Social Responsibility (“**CSR**”) at Neosym Industry Limited (“**Company**” or “**Neosym**”) portrays the deep symbiotic relationship that the Company enjoys with the communities it is engaged with. We are committed to operate our business with emphasis on Corporate Social Responsibility in all areas of our operation. We will integrate our business values and operations to meet the expectations of our shareholders, customers, employees, regulators, investors, suppliers, community and to take care of environment with best interest.

This CSR Policy shall operate as the corporate social responsibility policy of the Company for the purposes of Section 135 of the Companies Act, 2013 read with Schedule VII of the Act and the rules made thereunder including the Companies (Corporate Social Responsibility Policy) Rules 2014 (“**CSR Rules**”) as amended from time to time

Further, pursuant to Section 135 of the Companies Act, 2013 and the applicable rules enacted therein this Corporate Social Responsibility Policy (‘**CSR Policy**’) as formulated, recommended and adopted by the Board of Directors of the Company. This Policy will be applicable to Neosym including all its subsidiary companies in India.

VISION AND POLICY STATEMENT:

Corporate Social Responsibility (“**CSR**”) is the Neosym’s contribution to social and economic development of the local community in which we operate and the society at large. In every financial year, we commit to spend a minimum of 2% of the average net profits for the immediately preceding three financial years on CSR activities. The Board of Directors of the Company (‘**The Board**’) through its CSR Committee will plan and monitor the expenditure of CSR activities.

This CSR policy set the standards for the way we interact with the society at large and the environment around us. They may be supplemented from time to time by additional policy statements and guidelines.

DEFINITIONS:

- a. “**Act**” means the Companies Act, 2013, as amended from time to time.
- b. “**Board**” means the Board of Directors of the Company.
- c. “**Company**” means Neosym Industry Limited.
- d. “**CSR**” means Corporate Social Responsibility.
- e. “**CSR Committee**” means Corporate Social Responsibility Committee of the Company constituted by the Board.
- f. “**CSR Rules**” means Companies (Corporate Social Responsibility Policy) Rules 2014 and amendments thereon.
- g. “**CSR Policy**” means this Policy.

h. “**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.

i. “**Net profit**” means the net profit of a company as per its financial statement prepared in accordance with the applicable provision of the Act.

CSR PROGRAMMES AND PROJECTS:

(a) The Company will carry on its CSR activities in areas or subjects as prescribed under Schedule VII of the Act, as amended from time to time. An illustrative list of such areas or subjects is outlined below:

(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, 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 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, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to 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;

(vii) training to promote rural sports, nationally recognised sports, para-olympic sports and Olympic sports;

(viii) contribution to the Prime Minister's National Relief Fund or any other fund including Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund' (PM CARES 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) 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;

(x) Contributions to public funded Universities;

(xi) rural development projects;

(xii) slum area development;

(xiii) disaster management, including relief, rehabilitation and reconstruction activities.

(xiv) Any other activity as may be specified under the Act from time to time.

(b) The CSR activities shall be undertaken within the territory of the Republic of India.

(c) The Company's CSR projects and programs will be undertaken by the Company by itself or with joint and collaborative efforts of other companies.

(d) The CSR projects and programs may also be implemented through registered public charitable trusts or registered society, registered under section 12A and 80G of the Income Tax Act, 1961, companies established under Section 8 of the Companies Act, 2013 (corresponding to Section 25 of the Companies Act, 1956) and/or through any implementing entity eligible under the Act and

CSR COMMITTEE & ITS DUTIES:

As per Companies (Amendment) Act, 2020 (applicable w.e.f. 22nd January, 2021), if the amount to be spent by a company does not exceed fifty lakh rupees, the requirement for constitution of the CSR Committee shall not be applicable and the functions of such Committee provided under Section 135 shall be discharged by the Board of Directors of company.

As per the above-mentioned provision Board of Directors shall discharge the function of CSR Committee as prescribed in Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014.

ROLE AND RESPONSIBILITY OF THE BOARD:

The Board of Directors will be responsible for CSR initiatives, Annual Action Plan, Supervising the activities and complying such other requirements of Law. The CSR policy and programs shall be implemented, managed and supervised by the Board. The Board shall *inter alia* carry out following functions:

(i) Formulate and recommend the CSR Policy to the Board and suggest changes therein, from time to time;

(ii) Identify the areas of CSR activities to be taken up by the Company every year in accordance with this Policy;

(iii) Recommend the CSR Budget every year and project or activity to be undertaken;

(iv) Formulate and recommend to the Board for its approval, an annual action plan every financial year outlining the following:

- the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- the manner of execution of such projects or programmes;
- the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- monitoring and reporting mechanism for the projects or programmes; and details of need and impact assessment, if any, for the projects undertaken by the Company.

(v) Implement, oversee and monitor the progress of the project or activity rolled out under this Policy;

(vi) Provide an update to the Board on all CSR activities undertaken during the financial year; and

(vii) Supervise and ensure timely compliances and filing of Return related to CSR.

(viii) As and when the Board deems fit can constitute the CSR Committee which shall constitute 3 Directors out of which 1 shall be Independent Director.

(ix) Such other functions and responsibilities, as may be assigned from time to time.

IMPLEMENTATION:

The Neosym's CSR programmes will be identified and implemented according to the Board's approved CSR Policy.

CSR EXPENDITURE:

As per Section 135(5) company needs to spend average of 2% of its net profits of the Company made during the three immediately preceding financial years, the calculations of same shall be placed and approved by the Board.

SURPLUS ARISING, IF ANY:

Any surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of a company.

DISPLAY OF CSR ACTIVITIES ON ITS WEBSITE:

As per the CSR Rules, the contents of the CSR Policy shall be included in the Director's Report as per the prescribed format under Companies (Corporate Social Responsibility Policy) Rules, 2014 and same shall be displayed on the Company's website.

AMENDMENT OF POLICY:

The CSR policy of the Company may be amended at any time by the board of the Company.

Date: 15th July, 2023

Place: Pune

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.