

Mafatlal Industries Limited

Corporate Social Responsibility (CSR) Policy

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1. CONCEPT

1.1 The Arvind Mafatlal Group - CSR Philosophy

'MORE THAN AN OBLIGATION, MORE THAN A DUTY'

Fulfilling Corporate Social Responsibility is our group's second nature.

At Arvind Mafatlal Group, we consider our contribution as a humble tribute to what Society has given us. We have pledged our resources in various sectors and are striving continuously with the sole objective of creating an environment of well-being in all spheres of life.

The group has been implementing a range of CSR activities over the last fifty years, in areas like healthcare, education, women's upliftment in rural India and environment protection.

1.2 Brief Snapshot of activities undertaken by the Group

The Group Founder, late Shri Arvind Mafatlal was a great philanthropist. Shri Sadguru Seva Sangh Trust was founded in 1968. Over the years, the Trust was guided and nurtured by the late Shri Arvind Mafatlal and even today, the Trust is fully supported under the aegis of Arvind Mafatlal Group. The Trust is aimed at providing food to the hungry, clothing support to the downtrodden and the gift of sight to the blind.

Whether it is health care, education, agriculture, dairy or women empowerment 'Shri Sadguru Seva Sangh Trust' has contributed towards an overall development of entire areas surrounding the districts of Chitrakoot and Anandpur in Madhya Pradesh. Essential Health services in the field of General Medicine, Gastroenterology, Obstetrics,

Gynaecology and Paediatrics have been made available. The Trust has performed a record 14 lakh (1.4 million) eye surgeries under innumerable eye camps through Shri Sadguru Netra Chikitsalaya which is located at Chitrakoot and Anandpur in Madhya Pradesh.

Late Shri Arvind Mafatlal was actively associated with BAIF Development Research Foundation and also was at the helm of affairs as its chairman for many decades. Along with the legendary freedom fighter late Shri Manibhai Desai, he created a huge body of work in people-oriented fields of Rural Development. He laid great emphasis on cattle development, animal health laboratories, tribal rehabilitation and most importantly

resource development in terms of water and land. The BAIF programs today are spread across 16 States of India impacting the lives of around 4.4 million families.

We wish every life to be empowered and every deed to have a meaningful impact on society.

1.3 Short Title and Applicability

This policy, which encompasses the Arvind Mafatlal Group's and the Company's philosophy for describing its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large, is titled as the '**Mafatlal Industries Limited – Corporate Social Responsibility (CSR) Policy**'.

This policy shall apply to all CSR initiatives and activities taken up at the various locations, as decided by the CSR Committee and / or the Board of Mafatlal Industries Limited (MIL) for the benefit of various segments of the society.

The Policy shall be further governed by the provisions of the Companies Act, 2013, the rules framed thereunder by the Ministry of Corporate Affairs i.e., the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended from time to time) and other statutory provisions governing the matter.

2. SCOPE

2.1 Areas / Localities to be covered

The Company should give preference to the local area and the areas around it where it operates, for spending the amount earmarked for CSR activities.

On a need basis, the CSR activities could be extended to any area of the Country as may be permissible under the Companies Act, 2013.

2.2 Activities

The Company shall give preference to undertake CSR projects or programs which fall within the purview of the activities specified in Schedule VII of the Companies Act, 2013. The indicative list of the activities is as under:

- i) eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and making available safe drinking water.
- ii) promoting education including special education, and employment enhancing vocational skills, especially among children, women, elderly, and 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.
- 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 force veterans, war widows and their dependents.
- vii) training to promote rural sports, nationally recognised sports, paralympic sports and Olympic Sports.
- viii) contribution to Prime Ministers National Relief Fund or any other Fund set up by the Central Government, for socio economic development and relief and welfare of scheduled castes and scheduled tribes, other backward classes, minorities and women.
- ix) contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- x) rural development projects.

The CSR Committee and the Board of Directors shall be authorized to consider any other CSR activities which will be permissible under the provisions of the Companies Act, 2013 or Rules framed thereunder from time to time including any modifications thereto. The activities may or may not be specific to the local area of operations and may depend on the needs assessed for the people living in the Country. As far as possible, efforts will be made to co-ordinate with similar CSR activities that are taken up by the other companies of the Arvind Mafatlal Group or the Central Government or State Government in those areas.

The CSR projects or programs or activities that benefit only the employees of the Company and their families shall not be considered as CSR activities in accordance with the provisions of the Companies Act, 2013 and the rules framed thereunder.

3. RESOURCES, IDENTIFICATION AND APPROVAL PROCESS

3.1 Resources / Fund allocation

For achieving its CSR objectives through implementation of meaningful and sustainable CSR programs, the Company will allocate / earmark, in every financial year, at least 2% (two per cent) of the average net profits of the Company made during the three immediately preceding financial years, as its CSR Budget for the year. The average net profit shall be calculated in accordance with the provisions of Section 198 of the Companies Act, 2013.

Any unspent / unutilized CSR allocation of a particular year will be carried forward to the following year, i.e., the CSR budget will be non-lapsable in nature.

3.2 Unspent amount towards CSR:

Subject to the provisions of the Companies Act, 2013 (as amended from time to time) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended from time to time); the unspent amount towards CSR shall be dealt as under:

Where the Company spends less than the amount required to be spent under CSR obligations, then the unspent amount shall be dealt in the following manner:

- i) Where the unspent amount does not pertain to an ongoing project - the unspent amount is required to be transferred to the National Fund or Fund prescribed under Schedule VII within 6 months of the end of the financial year.
- ii) Where the unspent amount pertains to an 'ongoing project' such an amount needs to be transferred to a separate Bank account called as "unspent CSR A/C within 30 days of the end of the Financial Year. This amount to be utilized for the ongoing project during the next three financial years.
- iii) Such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year. Sec 135(6)

Ongoing project: -

- A multi-year project stretching over more than one financial year.
- Having a timeline not exceeding 3 years excluding the year of commencement.
- Includes such project that was not initially approved as a multiyear project but whose duration has been extended beyond one year by the Board based on reasonable justification.

3.3 Excess amounts spent towards CSR:

Subject to the provisions of the Companies Act, 2013 (as amended from time to time) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended from time to time) in case the company spends excess amounts towards CSR (over and above 2% in a financial year) it shall be eligible for set off such excess amount against the CSR obligation in succeeding three financial years, subject to the condition that the excess amount available for set off shall not include the surplus arising out of CSR activities and the Board shall pass a resolution for the said setting off the excess amount spent.

3.4 Identification Process

Identification of programs at Corporate and Unit Level will be done by means of the following:

- i) Need identification studies by external agencies / institutions.
- ii) Internal need assessment by cross-functional team.
- iii) Receipt of proposals/requests from District Administration/local Govt. etc.
- iv) Discussions and requests with local representatives/Civic bodies/Citizen's forums/voluntary organizations.
- v) Discretion of the CSR Committee and / or the Board of Directors.

3.5 Approval Process

CSR programs as may be identified by the corporate office / manufacturing units will be required to be put up to the CSR Committee with recommendations from the proposer at the corporate / unit level.

The programs approved by the CSR Committee would be put before the Board of Directors of the Company for their approval.

4. MODALITIES OF EXECUTION AND IMPLEMENTATION

4.1 Modalities of Execution

The investment in CSR activities should be project or program based and for every project or program, before execution of the project or program, the modalities of execution and time framed periodic milestones will be finalized.

The CSR activities may be undertaken and / or implemented by:

- i) the Company itself under the guidance and supervision of the CSR Committee or Board of Directors or any responsible person authorized in this behalf.
- ii) Registered trusts or society or company established by the Company or its holding or subsidiary or associate company. It may include the following Trusts:
 - a. Arvind Mafatlal Foundation Trust
 - b. Navinchandra Mafatlal Gagalbhai Foundation Trust
- iii) Registered trusts or society or company established by the Company or jointly by the companies belonging to the Arvind Mafatlal Group.
- iv) Registered trusts or society or company which is not established by the Company or its holding or subsidiary or associate company having an established track record of three years. It may include the following Trusts:
 - a. Shri Sadguru Seva Sangh Trust
 - b. Shri Chaitanya Seva Trust
- v) Collaboration with other entities allowed to engage in CSR activities.

The Company may also collaborate with other companies of the Arvind Mafatlal Group for undertaking projects or programs or CSR activities in such a manner that the CSR committee of the Company is in a position to report separately on such projects or programs or activities.

Every entity referred to hereinabove shall be required to comply with such requirements including but not limited to filing of statutory forms and obtaining such registrations, as may be mandated by the aforesaid Rules.

4.2 Implementation

The time period / duration over which a particular project or program or activity will be spread, will depend on its nature, extent of coverage and the intended impact of the same.

The projects or programs or activities which involve considerable financial commitment and are undertaken on a timeframe of 2-5 years, will be considered as '*flagship programs*' and will be accorded enhanced significance.

The Company will follow a project / program / activity-based accountability approach to stress on the long-term sustainability of CSR activities, where its action plan will be distinguished as '*Short-term*', '*Middle-Term*' & '*Long Term*'; qualified as

- i) Short Term – 6 months to 1 year
- ii) Medium Term – 1 year to 2 years
- iii) Long Term – 2 years and above – '*Flagship programs*'.

While identifying long term programs, all efforts must be made to the extent possible to define the following:

- i) Program objectives.
- ii) Baseline survey – It would give the basis on which the outcome of the program would be measured.
- iii) Implementation schedules- Timelines for milestones of the program will need to be prescribed.
- iv) Responsibilities and authorities
- v) Major results expected and measurable outcome.

5 MONITORING

To ensure effective implementation of the CSR activities undertaken, a monitoring mechanism will be put in place by the Corporate HR / Unit HR head. The progress of CSR activities under implementation will be reported to Corporate Office on a monthly basis.

The HR department at the Corporate Office will conduct impact studies on a periodic basis, through independent professional third parties / professional institutions, especially on the strategic and high value programs.

The monitoring team will also try to obtain feedback from beneficiaries about the activities.

Appropriate documentation of the CSR Policy, CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis.

CSR initiatives of the Company will also be reported in the Annual Report of the Company in accordance with the statutory provisions.

6 GENERAL

The Surplus arising out the CSR projects or programs or activities shall not form part of the business profit of the Company.

The Board shall ensure that the administrative overheads shall not exceed 5% of the total expenditure of the Company for a particular financial year. Any surplus arising out of CSR activities shall not form pan of business profits 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 or transfer such surplus to the Fund specified in Schedule VII, within a period of 6 months of the expiry of the financial year.

In case of any doubt or difficulty with regard to any provision of this policy or implementation of any CSR activity and also in respect of matters not covered herein, a reference to be made to CSR Committee. In all such matters, the interpretation & decision of the CSR Committee shall be final.

Any or all provisions of the CSR Policy would be subject to revision / amendment in accordance with the statutory provisions on the subject as may be stipulated by the Government, from time to time.

Approved by the Board on 27/5/2024.