

ADEKA INDIA PRIVATE LIMITED

Document History

Version	Date	Author Function	Reviewed by	Adopted by	Nature of changes
1.0	30/05/2019	CSR Committee	CSR Committee	Board of Directors	First version

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Scope and Applicability:

This Policy shall be applicable to all CSR initiatives and activities undertaken by the Company for the benefit of the different segments of the society.

2. Allocation of Funds:

To be compliant with the requirements of the Companies Act, 2013 the Company shall spend 2 % or more of its average net profits for the immediately preceding three financial years or such other minimum amount as may be specified under the CSR Provisions.

Provided further that for building up CSR capabilities of its own or that of an outside agency, the Company shall not spend more than 5% of the amount allocated for CSR activities.

3. CSR Committee:

The Corporate Social Responsibility Committee of the Company shall consist of:

1. Mr. Toshinori Yukino, Chairman and Director; and
2. Mr. Kailash C. Trehan, Director and Manager.

The Committee shall carry out the following functions:

1. Formulate and recommend a Corporate Social Responsibility Policy to the Board of Directors;
2. Recommend amount of expenditure to be incurred on the activities;
3. Monitor the Corporate Social Responsibility Policy of the Company from time to time;
4. Formulate plans for CSR initiatives;
5. Decide, allocate and disburse amount of expenditure for the initiatives referred above;
6. Check progress of the initiatives.
7. Create and Monitor Mechanisms to ensure proper utilization of funds

4. CSR Initiatives and Programs:

Keeping in view Schedule VII of the Companies Act, 2013 and the Rules thereto, CSR committee shall recommend and carry out any one or more of the following activities:

- 1) Company shall endeavor to work in the field of education and healthcare etc, more specifically in areas related to :
 - a) Collaboration and donations to well-established NGOs and other organizations in the field of education, health care etc.,
 - b) Promote, support and sponsor various activities for smooth functioning of above;

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c) Provide or allocate or organize scholarships or financial support to needy & / or deserving persons for education;

e) Activities such as visits to museums etc., for purpose of education;

f) Setting up Reading Room(s) and or Library(ies) of books, and audio video facilities and materials;

2) Company may also undertake activities as specified under Schedule VII of the Companies Act. Activities undertaken in pursuance of normal course of business of the Company shall not constitute CSR activities.

Any surplus arising out of CSR activities shall not form part of business profit of a Company.

5. CSR in collaboration through a medium:

The CSR Committee will decide the mode of execution of such activities i.e. whether such activities will be carried out by:

a) A registered and approved trust or society or a company with an established track record of not less than three years in undertaking similar programs or projects; or

b) By a person or team of persons specifically formed for such purpose.

The CSR Committee may also decide to contribute the entire or part of the amount to any fund as is within the scope of CSR Provisions.

6. Prohibited Fields of operation for CSR Activities:

The Company shall not make any allocations to or undertake any CSR activities, programs or projects which are:

- For the benefit of any particular political party, front or ideology.
- For the benefit of any particular religion, religious belief or religious sect. – For the benefit of any particular caste or community.
- For the sole benefit of employees of the Company.

Also, the Company shall not make any allocations to or undertake any CSR activities which are outside the scope of the CSR provisions, especially schedule VII of the Companies Act, 2013.

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7. Reporting and Monitoring of CSR Activities:

- The CSR Committee shall decide and implement methods of reporting, monitoring and audit of CSR Activities and expense and impact of the CSR activities;
- All expenses shall be recorded properly and records shall be maintained;
- Cash transactions prohibited for any CSR activity and all payments shall be through cheques or bank transfer;
- The Board of Directors shall have power to amend / modify any of the clauses of the CSR Policy; They may do so either at a Board Meeting or by way of a Circular Resolution;
- Interpretation of any of the terms / clauses etc. of this Policy shall rest with the CSR Committee.
