AMRIT BANASPATI COMPANY LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY ("CSR POLICY")

Philosophy

At Amrit Banaspati Company Ltd. ('the Company' or 'ABCL'), we strongly believe in sustainable development which is beneficial for the society at large. Recognizing that business enterprises are economic organs of society and draw on societal resources, it is our co-extensive responsibility to pay back in return to society in terms of helping needy people, keeping the environment clean and safe for the society by adhering to the best industrial practices and adopting best technology. It is our core responsibility to practice the corporate values through commitment to grow in socially and environmentally responsible way while meeting the interest of our stake-holders.

Objectives

The key objectives of our CSR policy are:

- Define what CSR means to us and the approach to be adopted to achieve our goals;
- Define the kind of projects that will come under the ambit of CSR;
- Identify broad areas of intervention in which the Company will undertake projects;
- Serve as a guiding document to help execute and monitor CSR projects;
- Elucidate criteria for partner implementation agencies;
- Explain the manner in which the surpluses from CSR projects will be treated.

List of Activities/Projects

The Company shall undertake any of the following activities/projects or such other activities/ projects as may be notified by the Ministry of Corporate Affairs from time to time as a part of the Corporate Social Responsibility Policy ("CSR Policy"):

- (i) Eradicate hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the Swach Bharat Kosh set up by the Central Government for promotion of sanitation and making available safe drinking waters;
- (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 centers 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, agro-forestry, 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;
- (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;
- (vi) Measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) Training to promote rural sports, nationally recognized sports, Paralympics and Olympic sports;
- (viii) Contribution to the Prime Minister's Relief 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;
- (ix) Contribution or funds provided to technology incubators located within academic institution which are approved by the Central Government;
- (x) Rural development projects;
- (xi) Slum area development
- (xii) Any other activities in relation of the above and all other activities which forms part of CSR as per Schedule VII of the Companies Act, 2013 (the "Act") as amended from time to time (collectively hereinafter referred to as "CSR activities").

The CSR activities shall be undertaken only in India for the benefit of the public and not for the employees of the Company and their family provided that the preference shall be given to the local areas and areas where the Company operates for undertaking the CSR activities.

Quantum of amount to be spent on CSR Activities

- (i) The Company shall strive to spend in every financial year, at least 2% (two percent) of the average net profit of the Company made during the three immediately preceding financial years;
- (ii) Any surplus arising and/or additional revenue generated out of CSR activities undertaken by the Company shall not form part of the business profit of the Company and the same shall be spent for undertaking any CSR activities only;

Implementation of CSR Activities

- (i) The Company may undertake CSR activities through a registered trust or a registered society or any company, established by the Company, its holding or subsidiary company under Section 8 of the Act for not-for-profit objectives provided that the Company can carry out the CSR activities through such other institutions not established by the Company having an established track record of 3 (three) years in undertaking the CSR activities.
- (ii) The Company may collaborate with other companies for undertaking the CSR activities subject to fulfillment of separate reporting requirements as prescribed in the Companies (Corporate Social Responsibility) Rules, 2014 (the "Rules");

- (iii) The CSR activities shall not include any activity undertaken by the Company in pursuance of normal course of business of the Company;
- (iv) The Company shall not make any payment directly or indirectly to political party(ies) for CSR activities.

Governance Structure

The Company has constituted a robust and transparent governance structure to oversee the implementation of our CSR policy, in compliance with the requirement of Section 135 of the Companies Act, 2013.

Board level CSR Committee

At Amrit Banaspati, our CSR governance structure will be headed by the Board level CSR Committee that will be ultimately responsible for the CSR projects undertaken. The Committee will report to the Board of Directors:

- Members of the Committee

- Mr. A.K. Bajaj, Chairman
- Mr. Kamal Budhiraja, Member
- Mr. V.K. Bajaj, Member

- Responsibilities of the Committee

- Formulate and update our CSR Policy, which will be approved by the Board of Directors of the Company;
- Suggest areas of intervention to the Board of Directors of the Company;
- Approve projects that are in line with the CSR policy;
- Put monitoring mechanism in place to track the progress of each project;
- Recommend the CSR expenditure to the Board of Directors of the Company, who will approve it; and
- Meet at least twice a year to review the progress made.
