

## **OSWAL EXTRUSION LIMITED**

**[CIN:U25200GJ2004PLC045239]**

### **CSR POLICY**

#### **CONTEXT**

OSWAL EXTRUSION LIMITED ('Oswal' or 'the Company') has been an early adopter of Corporate Social Responsibility ('CSR') initiatives. Along with sustained economic performance, environmental and social stewardship is also a key factor for holistic business growth. It has always been committed to the cause of social service since its inception and has repeatedly channelized a part of its resources and activities, such that it positively affects the society socially, ethically and also environmentally. The Company is committed to take up various Corporate Social Responsibility ("**CSR**") initiatives and enhanced value in the society. Oswal Extrusion Limited also works to make a difference among local communities. The Company's focus has always been to contribute to the sustainable development of the society and environment, and to make our planet a better place for future generations.

With the commencement of the Companies Act, 2013 constitution of a Corporate Social Responsibility Committee ("**CSR Committee**") of the Board and formulation of a Corporate Social Responsibility Policy became a mandatory requirement. Therefore, the Company seeks to formulate a formal CSR Policy which encompasses its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs for the welfare & sustainable development of the society.

#### **2. APPLICABILITY**

As per the Companies Act, 2013 of section 135 (1) and Corporate Social Responsibility Policy Rule 14, state the following criteria for applicability of CSR Committee;

- a) Every company having net worth of rupees five hundred crore or more, or
- b) Turnover of rupees one thousand crore or more, or
- c) A net profit of rupees five crore or more,

During any financial year shall constitute a Corporate Social Responsibility Committee.

#### **3. OBJECTIVES**

Oswal's CSR Policy intends to:

- Strive for economic development that positively impacts the society at large with minimal resource footprint.
- Embrace responsibility for the Company's actions and encourage a positive impact through its activities on hunger, poverty, malnutrition, environment, communities,

stakeholders and *the* society.

The Company firmly believes that CSR is primarily, the responsibility of the Company in relation to the impact of its decisions and activities on the society and also the environment, through a transparent and ethical behavior

## 5. DEFINITIONS:

In this Policy, unless the context otherwise requires:

- a. **“Act”** shall mean the Companies Act 2013, including any modifications, amendments or reenactment thereof.
- b. **“Agency”** (or Agencies) means any Section 8 Company or a registered trust/ society/NGO/ institution, performing social services for the benefit of the society and excluding a registered trust/society/NGO/institution/Section 8 Company which is formed by the Company or its holding or subsidiary company/companies.
- c. **“Approved Budget”** shall mean the total budget as approved by the Board of the Company upon the recommendation of the CSR Committee, which is to be utilized for CSR Projects.
- d. **“Board”** shall mean the Board of Directors of the Company.e. **“Company”** shall mean Oswal Extrusion Limited and wherever the context requires,shall signify the Company acting through its Board.
- f. **“CSR Annual Plan”** shall mean the annual plan detailing the CSR expenditure for the year.
- g. **“CSR Committee”** shall mean the Corporate Social Responsibility Committee constituted by the Board of the Company in accordance with the Act, consisting of three or more directors,out of which at least one director shall be an independent director.
- h. **“CSR expenditure”** means all CSR expenditure of the Company as approved by the Board upon recommendation of the CSR committee, including the following:
  - i. contribution to CSR Projects which shall be implemented and/or executed by the Company;
  - ii. contribution to CSR Projects (including for corpus as required) which shall be implemented and/or executed by its Trust or Society; and
  - iii. contribution to CSR Projects (including for corpus as required) which shall be implemented and/or executed by an Agency.
  - iv. Any other contributions covered under Schedule VII to the Companies Act, 2013.

**Contribution of any amount directly or indirectly to any political party under section 182 of the Act, shall not be considered as CSR expenditure.**

i. **“CSR Policy”** shall mean the present Corporate Social Responsibility Policy of the Company, which covers the activities to be undertaken by the Company as specified in Schedule VII to the Act and the CSR Expenditure thereon.

j. **“CSR Projects”** or **“Projects”** means Corporate Social Responsibility projects/activities/ programs/ initiatives, instituted in India, either new or ongoing, and includes, but is not limited to those undertaken by the Board in pursuance of recommendations of the CSR Committee as per the declared CSR Policy of the Company.

Projects/activities/ programs/ initiatives undertaken in pursuance of normal course of business of the Company and projects which benefit only the employees of the Company and their families shall not be considered as CSR Projects.

k. **“Financial Year”** shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.

l. **“Net profit”** shall mean the net profit as per the Act and Rules based on which the specific percentage for CSR expenditure has to be calculated.

m. **“Rules”** shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re-enactment, modifications or amendments thereof.

### **3. FOCUS AREAS**

In accordance with the requirements under the Companies Act, 2013, Oswal's CSR activities, amongst others, will focus on :

- Providing financial and/or other assistance to the Agencies involved in exclusive medical research, public health, nursing etc.
- Providing financial assistance to deserving people for specialized medical treatment in any medical institution.
- Activities concerning or promoting: a. General health care including preventive health care, b. Safe motherhood, c. Child survival support programs, d. Health / medical camps, Better hygiene and sanitation, f. Adequate and potable water supply, etc.

- **EDUCATION:** Promoting education, including special education and employment-enhancing vocational skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies.
- **COMMUNITY DEVELOPMENT:** The Company is committed to improving the well-being of the local community by implementing social projects in designated villages and local communities.
- **GENDER EQUALITY AND EMPOWERMENT OF WOMEN AND ORPHANS AND SENIOR CITIZENS:** Promoting gender equality and empowering women; setting up homes, hostels and day care centers for women and orphans; setting up old age homes, dharamshallas and such other facilities for senior citizens; and adopting measures for reducing inequalities faced by socially and economically backward groups.
- **ENVIRONMENTAL SUSTAINABILITY:** Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water.

## 5. LOCATION OF CSR EFFORTS

The CSR committee will decide on the locations for CSR activities. The Company will give preference to the local areas and areas near Ahmedabad and Gandhinagar for spending the amount on CSR activities.

## 6. COMPOSITION OF CSR COMMITTEE

### CSR Committee

Composition of the the CSR committee: The composition of the CSR Committee of the Board is as under.

S. No.	Name	Designation/Category	CSR Committee
1	Mr.Siddharth Parekh	Managing Director	Chairman
2	Ms. Meenakshi Dhelriya	Independent Director	Member
3	Mr. Ashok Sharma	Additional Director	Member

## 7. RESPONSIBILITIES OF THE COMMITTEE

### Responsibility of the CSR Committee:

Formulate and recommend the CSR Policy to the Board for approval. The Committee shall indicate the projects to be undertaken by the Company as specified in Schedule VII.

- Monitor the Policy from time to time and recommend changes to the Board.

- Recommend the amount of expenditure to be incurred on CSR projects. Institute a transparent monitoring mechanism for ensuring implementation of the social projects undertaken by the Company.

## **8. GOVERNANCE**

The Company through a registered trust or a registered society can undertake CSR activities as per the provisions of the Companies Act, 2013. Accordingly, The Company or such other entity will work closely with and support the Board and the CSR Committee in implementing CSR activities of the Company. Oswal or such other entity will assist the CSR Committee in identifying the areas of CSR activities, programs and execution of initiatives as per defined guidelines. The Company or such other entity will also assist the Board and the CSR Committee in reporting the progress of deployed initiatives and in making appropriate disclosures (internal/external) on a periodic basis.

## **9. FUNDING, SELECTION AND MONITORING PROCESS**

- The Board of Company shall ensure that in each financial year, the Company spends at least 2% of the average net profit made during the immediate three preceding financial years.
- The unutilized CSR budget from the 2% of the average net profit will be parked in a CSR Fund (Corpus) created by the Company. This Fund would also include any income arising there from and any surplus arising out of CSR activities.
- In case of any surplus arising out of CSR projects the same shall not form part of business profits of the Company

The Company has set up dedicated teams for implementation of CSR projects. The mode of implementation will include a combination of direct implementation and implementation through trust/foundation/society/section 8 companies etc. set up by the Company and partners such as NGOs, business partners, registered societies etc. The Company will select its partners after appropriate due diligence

Oswal Extrusion Limited will receive requests for funding of projects throughout the calendar year. Its panel of experts will evaluate proposals received under the Foundation's focus areas and projects will be prioritized by assessing their impact. Then it will forward its recommendations to the CSR Committee. The CSR Committee will deliberate on the proposals and approve proposals for implementation at its discretion.

The Company will monitor progress on CSR projects and CSR spend and report to the top management and the CSR Committee from time to time.

## **FORMAT FOR THE ANNUAL REPORT ON CSR ACTIVITIES TO BE INCLUDED IN THE BOARD'S REPORT**

1. A brief outline of the Company's CSR policy, including overview of projects or programs proposed to

be undertaken and a reference to the web link to the CSR policy and projects or programs.

2. The composition of CSR Committee.

3. Average net profit of the Company for last three financial years.

4. Prescribed CSR Expenditure (two percent of the amount as in item 3 above)

5. Details of CSR spent during the financial year;

a) Total amount to be spent for the financial year;

b) Amount unspent, if any;

c) Manner in which the amount spent during the financial year is detailed below.

S. No.	CSR Project or Activity Identify	Section in which project is covered	Project Programs 1. Local Area 2. Specify the State and Projects or Programs was undertaken	Amount outlay (Budget) Project or Programs wise	Amount spent on the Projects or Programs Sub heads: 1. Direct Expenditure on Projects or Programs 2. Overheads	Cumulative Expenditure upto the Reporting Period	Cumulative Expenditure upto the Reporting Period
	<b>Total</b>						

**Validity of CSR Policy**

The CSR Committee or Board may amend the CSR policy as may be required from time to time.

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