

TIRUPATI REELS PRIVATE LIMITED

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CORPORATE SOCIAL RESPONSIBILTY ("CSR') POLICY

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Background

Tirupati Reels Private Limited (referred to as "TRPL" or "the company") is a leading manufacturer and supplier of wooden pallets, outer lagging and cable Drums with a glorious track record.

In line with the regulatory requirements, we are putting in place a formal CSR policy as a guide towards our social commitments going forward.

Objective

The main objective of CSR policy is to make CSR a key business process for sustainable development of the society. Tirupati Reels Private Limited *will act as a good corporate citizen* and aims at supplementing the role of Government in enhancing the welfare measures of the society within the framework of its policy.

Measures

In the aforesaid backdrop, CSR policy of Tirupati Reels Private Limited is broadly framed considering the following measures:

The CSR activities shall be undertaken by Tirupati Reels Private Limited, as stated in this Policy, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business.

Tirupati Reels Private Limited shall give preference to the local area or areas around it where it operates, for spending the amount earmarked for CSR activities.

The Board of Tirupati Reels Private Limited may decide to undertake its CSR activities either on its own initiatives or through any implementation agency as recommended by the CSR Committee in accordance with the provision of section 135 of The Companies Act, 2013 and the Rule made there under. CSR implementation shall be periodically reviewed and monitored by the duly constituted CSR committee of the Board as per the requirement of Section 135 of the Companies Act, 2013 and rule made there under.

The following is the list of CSR projects or programs which Tirupati Reels Private Limited plans to undertake pursuant to Schedule VII of the Companies Act, 2013:

1. 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.
2. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
3. 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.

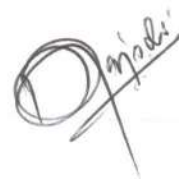


4. ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water, including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga
5. 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 art and handicrafts;
6. measures for the benefit of armed forces veterans, war widows and their dependents, [Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows];
7. training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
8. contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio-economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
9. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), [Department of Biotechnology (DBT)], Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).]
10. rural development projects]
11. slum area development. For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.
12. disaster management, including relief, rehabilitation and reconstruction activities.
13. Any other measures with the approval of Board of Directors on the recommendation of CSR Committee subject to the provisions of Section 135 of Companies Act, 2013 and rules made there-under.

Constitution of Corporate Social Responsibility Committee: -

In accordance with the provisions of section 135 of the companies Act, 2013, The Corporate Social Responsibility (CSR) committee of "TRPL" was constituted by the Board of Directors of the Company. The said committee comprises of the following two Directors viz:

1. Mr. Pratik Suresh Jajodia
2. Mr. Rishikesh Suresh Rajurkar



The Role of the Corporate Social Responsibility Committee: -

1. To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII;
2. To recommend the amount of expenditure to be incurred on the activities to be undertaken by the company in areas or subject, specified in Schedule VII; and
3. To monitor the Corporate Social Responsibility Policy of the company from time to time.
4. Such other functions as the Board may deem fit, relating to CSR Activities

The Role of Board of Directors: -

The Board of the company shall after taking into account the recommendations made by the CSR Committee, approve the policy for the company and disclose contents of such Policy in its report and also place it on the company's website, as per the particulars specified in Rule 9 of the companies (Corporate Social Responsibility policy) Rule, 2014 and ensure that the activities as are included in the CSR Policy of the company are undertaken by the company.

The Board of the company shall ensure that in each financial year the Company spends at least 2% of the average net profits of the company made during the three immediate preceding financial years, calculated in accordance with Section 198 of the Act, in pursuance of its CSR policy. Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the Company where it operates.

As per Section 135 of the Act, the Board of Directors shall specify the reasons for under spending/non spending the CSR amount in the Board's Report.

Activities, setting measurable targets with timeframes and performance management:

Prior to the commencement of CSR activities/projects, we carry out a baseline study of the nearby area of the Company's factory location.

The study encompasses various parameters such as – health indicators, literacy levels, sustainable livelihood processes, rural development, development of sports, etc

All activities/projects of CSR are assessed under the agreed strategy, and are monitored every quarter/year, measured against targets and budgets. Wherever necessary, midcourse corrections are made.

Budgets

A specific budget is allocated for CSR activities and spending on CSR activities shall not be less than 2% of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this policy.



Approving authority for the CSR amount to be spent would be any one Director or the Managing Director or VP (F)/Chief Financial Officer of the Company after due recommendation of CSR Committee and approval of the Board of Directors of the Company.

The CSR Policy mandates that the surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of a company.

The CSR projects or programs or activities undertaken in India only shall amount to CSR expenditure.

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 the CSR Committee, but does not include any expenditure on any item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Companies Act 2013.

Tax treatment of CSR spent will be in accordance with the Income Tax Act as may be notified by CBDT.

Information dissemination

The Company's engagement in this domain is disseminated on its website, annual reports as and when deem fit.

Management Commitment

Our Board of Directors, our Management and all our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterised by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

Update and Compliance with Companies Act, 2013

This policy shall be updated from time to time, by the Company in accordance with the amendments, if any, to the Companies Act, 2013, rules made there under or any other applicable enactment for the time being in force

