CORPORATE SOCIAL RESPONSIBILITY POLICY

INTRODUCTION

Pradeep Polyflex Private Limited is engaged in manufacturing in flexible packaging. While pursuing our business strategy of maximizing the wealth of all stake holders, the Company operates in such a manner that not just continues to generate an attractive return for shareholders, but also minimizes our impact on the environment and helps in replenishing the planet; wrthe lending a helping hand to the community.

As a responsible corporate citizen, we try to contribute for social and economic development on regular basis. We believe that to succeed, an organ\zat\on must maintain highest standards of corporate behaviour towards it employees, consumers and societies in which it operates. We are of opinion that CSR underlines the objective of bringing about a difference and adding value in our stakeholder's lives.

This CSR Policy shall operate as the Corporate Social Responsibility Policy of the Company for the purposes of Section 135 of the Companies Act, 2013 and the rules made thereunder including the Companies (Corporate Social Responsibility Policy) Rules 2014("CSR Rules") as amended from time to time.

THE' OBJECTIVE OF THE POL\CY

- Through sustainable measures, actively contribute to the social, economic and environmental development of the community in which the Company operates ensuring participation from the community and thereby create value for the nation.
- Establishing a guideline for compliance with the provisions of Regulations to dedicate a percentage of Company's profits for social projects.
- Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.
- Creating opportunities for employees to participate in socially responsible initiatives

CSR PROGRAMMES AND PROJECTS

The Company proposes to adopt one or more of the following CSR projects or programmes which ar"e as prescribed by applicable laws, including Schedule VII of the Companies Act, 2013, as amended from time to time:

- 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 a bled, 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 educing inequalities faced by socially and economically backward groups;

- 4. 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 Clean G anga 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 arts and handicrafts:
- 6. Measures for the benefit of armed forces veterans, war widows and their dependents;
- 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 any other fund set up by the Central Government far socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- 9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Govern me nt;
- 10. Rural development projects.
- 11. Slum area development.

CSR COMMITTEE

- 1. The CSR policy and programs shall be implemented, managed and supervised by the CSR committee appointed by the Board.
- 2, The CSR Committee shall comprise at least of such number of directors as is mandatorily required by applicable laws.

RESPONSIBILITES OF CSR COMMITTEE

The responsi bi1ities of the CSR Committee include:

- 1. Formulating and recommending to the Board of Director the CFR Policy and indicating activities to be undertaken.
- 2. Recommending the amount of expenditure for the CSR activities, and
- 3. Oversee and monitor the progress of the initiatives rolled out under this Policy; and
- 4. Monitoring CSR activities from time to time
- 5. Formulate and recommend to the Board Annual Action Plan in pursuance with this CSR Policy
- 6. Submit a report, to the Board on all CSR activities undertaken during the financial year
- 7. Such other functions as the Board of Directors may deem fit

CSR BUDGET

The total budget for the CSR projects will be decided by the CSR Committee.

CSR REPORTING

The Board Report of a Company shall include an Annual Report on CFR containing particulars specified in Annexure to the CSR Rules as per the prescribed format.

FINANCIAL OUTLAY AND IMPLEMENTATION FOR CSR ACTIVITIES

- Every year, the Company shah) with the approval of its Board make a budgetary allocation for CSA activities/ projects for the year. The budgetary allocation will be based on the profitability of the Company and the requirements of applicable laws.
- The Company expects to spend the budgeted amount allocated for CSR activities/ projects planned for each financial year, within that year. If for any reason, the budget of a year remains unutilised, the same would not lapse and would be carried forward to the next year for expenditure on CSR activities, which were planned for implementation in the previous year, but could not be completed due to some reason.

The corpus for the purpose of carrying on the CSR activities would include the followings:

- 1. 2% of the average Net Profit made by the Company during immediately preceding three Financial Years.
- 2. Any income arising there from.
- 3. Any surplus arising out of the CSR activities, projects or programs shall not form part of the business profits of the Company.
- The CSR Activities would be chosen for implementation by the Company in compliance with the provisions of Section 135 read together with Schedule VII of the Companies Act, 2013,
- The CSR activities shall be undertaken within the territory of the Republic of India
- The Company's CSR projects and programmes will be undertaken by the Company by itself or with joint and collaborative efforts of other companies.
- The CSR projects and programmes may also be implemented through external agencies i.e. registered public charitable trusts, not-for-profit companies set up under Section 2S of the Companies Act, 1956 corresponding to Section 8 of the Companies Act, 2013) through recognized and reputed NGOs and similar entities.

MONITORING AND REPORTING FRAMEWORK

Implementation and monitoring of the CFR activities will be overseen by the CSR Committee & will regularly report to the Board. The monitoring and evaluation may be assigned by the CSR Committee to an independent external agency for the sake of objectivity and transparency.

The CSR Committee will monitor the Corporate Social Responsibility Policy of the company from time to time;

The Company recognises that monitoring is critical for assessment of the progress as regards timelines, budgetary expenditure and achievement of targets. Monitoring maybe done periodically with the help of identified key performance indicators, the periodicity being determined primarily by the nature of key performance indicators.

• Monitoring will be done in project mode with continuous feedback mechanism, and recourse always

available for mid-course correction in implementation, whe never required.

The performance of the Company's CSR activities would be monitored on the basis of their achievement of annual targets and the utilization of their annual budgets for the activities planned and the targets set for each year.

If the projects are being implemented by external agencies, there will be mechanism of monthly repon'ing of progress on each such activities and the amount incurred thereon.

GENERAL

- 1. All provisions of the CSR Policy would be subject to revision/amendment in accordance with the applicable laws.
- 2. The Company reserves the right to modify, cancel, add, or amend this CSR Policy
- 3. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc

REVIEW DF THE POLICY

The CSR Committee shall review the CSR Policy from time to time based on the changing needs and make suitable modifications as m• v be necessary with the approval of the Board.











