



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. PREAMBLE & OBJECTIVE

At **Atharva Poly Plast Limited** ("the Company"), we believe that business growth and social responsibility must go hand in hand. As a responsible corporate citizen, we are committed to creating a positive impact on society and the environment.

The objective of this CSR Policy is to:

- Lay down guidelines to make CSR a key business process for sustainable development.
- Direct our interventions toward community welfare, environmental sustainability, and inclusive growth.
- Fulfill our regulatory obligations under Section 135 of the Companies Act, 2013, read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

2. CSR FOCUS AREAS

Given our operational domain in the polymer and plastics industry, the Company will prioritize interventions that promote environmental balance and community well-being. The Company shall undertake CSR activities in one or more of the following areas as listed in Schedule VII of the Companies Act, 2013:

A. Environmental Sustainability (Core Focus)

- Promoting circular economy initiatives, plastic recycling, and efficient waste management.
- Conservation of natural resources, water harvesting, and maintaining the quality of soil, air, and water.
- Tree plantation drives and development of green belts in and around operational areas.

B. Healthcare & Sanitation

- Promoting preventive healthcare and sanitation (including contribution to the Swachh Bharat Kosh).
- Providing safe drinking water facilities to underprivileged communities.

C. Education & Skill Development

- Promoting education, including special education, and providing infrastructure support to rural schools.



- Employment-enhancing vocational skills for youth and women to improve livelihood opportunities.

D. Rural & Community Development

- Rural development projects and slum area development.
- Disaster relief and rehabilitation initiatives as and when required.

Note: The Company will not undertake activities that are in the normal course of business, nor will it fund activities that benefit only the employees of the Company and their families.

3. GOVERNANCE STRUCTURE

1.1 CSR Committee

The Board of Directors has constituted a CSR Committee comprising the following members:

1. AMRUTA NISHANT PATIL – Chairperson
2. PRITY BISHWAKARMA – Member
3. SADHANA SHIVAJI DARADE – Member

1.2 Responsibilities of the CSR Committee:

- Formulate and recommend to the Board this CSR Policy, indicating the activities to be undertaken.
- Recommend the amount of expenditure to be incurred on the selected CSR activities.
- Formulate an Annual Action Plan detailing the projects, execution modalities, and implementation schedules.
- Monitor the implementation of the CSR Policy and projects from time to time.

1.3 Responsibilities of the Board of Directors:

- Approve the CSR Policy and Annual Action Plan upon the recommendation of the CSR Committee.
- Ensure that the Company spends at least **2% of the average net profits** made during the three immediately preceding financial years on CSR activities.
- Disclose the composition of the CSR Committee, the CSR Policy, and approved projects on the Company's website.
- Ensure that unspent CSR funds, if any, are treated and transferred strictly in



accordance with the Companies Act, 2013.

4. CSR BUDGET & FUNDING

- The CSR budget will be determined annually based on the statutory requirement of 2% of the average net profits of the past three financial years.
- Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be plowed back into the same project or transferred to the Unspent CSR Account.
- If the Company spends an amount in excess of the requirement, such excess amount may be set off against the requirement to spend up to the immediate succeeding three financial years.

5. IMPLEMENTATION STRATEGY

The Company may implement its CSR activities through the following modes:

1. **Direct Implementation:** Directly by the Company's internal CSR team.
2. **Implementing Agencies:** Through eligible registered public trusts, registered societies, or Section 8 companies (NGOs) that have an established track record of at least three years in undertaking similar activities and possess a valid CSR-1 registration with the Ministry of Corporate Affairs.
3. **Collaborations:** By collaborating with other corporate entities, provided that the respective CSR Committees can report separately on such projects.

6. MONITORING & EVALUATION

To ensure effective implementation:

- The CSR Committee will receive quarterly/half-yearly progress reports from the implementing teams/agencies.
- The Chief Financial Officer (CFO) or the person responsible for financial management shall certify that CSR funds have been disbursed and utilized for the approved purposes.
- For projects meeting the statutory threshold (if applicable), the Company will undertake an independent Impact Assessment through a third-party agency.

7. REPORTING & DISCLOSURE

- An Annual Report on CSR activities shall be included in the Board's Report as per the prescribed format under the Companies Act, 2013.



- The CSR Policy and details of the approved projects shall be displayed on the official website of the Company:

8. AMENDMENTS TO THE POLICY

The Board of Directors may revise, amend, or modify this CSR Policy at any time based on the recommendations of the CSR Committee or to comply with statutory amendments.

9. ANNUAL ACTION PLAN

The Board of the Company or its CSR Committee shall formulate an Annual Action Plan in pursuance of this CSR policy, which shall include the following, namely:

- (i) The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act.
- (ii) The manner of execution of such projects or programmes as specified in sub-rule (1) of Rule 4.
- (iii) The modalities of utilisation of funds and implementation schedules for the projects or programmes.
- (iv) Monitoring and reporting mechanism for the projects or programmes; and
- (v) Details of need and impact assessment, if any, for the projects undertaken by the company.

The Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

FOR ATHARVA POLY-PLAST LIMITED

Sd/-
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Managing Director
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