

ANSHUL SPECIALTY MOLECULES PRIVATE LIMITED

CIN: U24100MH1971PTC015364

*Registered Office: Flexcel Park, C Wing, 2nd Floor, S. V. ROAD, Near 24 Karat Multiplex,
Jogeshwari (West), Mumbai 400102.*

Phone No.: 022-62252900 / Email: info@anshulchemicals.com

CORPORATE SOCIAL RESPONSIBILITY POLICY

CONTEXT

Anshul Specialty Molecules Private Limited "Company" is promoted by the visionary Shroff Family, that has a chemical stronghold not only on Indian Shores but the world over. With more than five decades of chemical excellence 'EXCEL' Industries Limited, the True Head of the group, with a single unifying mission to place India on the chemical map of the world' has tamed the most hazardous chemicals into matter-of-fact process.

The Company is spread across an array of businesses like Manufacturing of Intermediates for APIs, Ingredients for Flavours & Fragrances & Custom Synthesis amongst many others. superlative execution capabilities, rich experience and global partnerships help design responsible & customized solutions for Company's clients and also constantly engages with communities across the world through its many business and corporate social responsibility ventures.

Company has a social responsibility in conducting Trade and Commerce. Our commitment to sustainable development is truly complete when society reaps benefits, all Company's stake holders should benefit. This underlying philosophy is the bedrock upon which our pillars of conduct and social accountability stand.

The Company envisions that the CSR projects can create significant positive impact on the wellbeing of communities and will contribute towards following projects for the communities in and around our operations/ offices and in other need-based locations:

- Natural Resource Management
- Human Resource Development
- Socio-Economic Development
- Health Camps
- Environment Protection
- Rain Water Harvesting
- Rural Transformation
- Safe Drinking Water
- Education to under Privileged
- Infrastructure Development

The CSR Policy is formulated in accordance with the provisions of Section 135 of the Companies Act, 2013 and the rules made thereunder and other applicable laws to the Company.

RESPONSIBILITY OF THE BOARD OF DIRECTORS

The Board of Directors shall nominate a CSR committee which consists of three or more directors, with at least one independent director. In addition, the Board in accordance with the CSR Amendment Rules, 2021 shall:

- ❖ Mandatorily disclose the composition of CSR committee, CSR policy and CSR approved projects and CSR Report on their website.
- ❖ Monitor the implementation of ongoing projects and make modifications if needed within the approved timeline
- ❖ Ensure that the administrative overheads do not exceed 5% of the CSR expenditure for that financial year



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RESPONSIBILITY OF CSR COMMITTEE

- ❖ To formulate and recommend a CSR Policy indicating the activities to be undertaken by the Company in areas or subject specified in Schedule VII to the Act;
- ❖ To recommend the amount of expenditure to be incurred on the activities referred to in clause (a);
- ❖ To formulate and recommend an annual action plan in pursuance of CSR Policy covering the following aspects:
 - The list of approved CSR projects or programs to be undertaken in areas or subjects specified in Schedule VII to the Act;
 - The manner of execution of such projects or programs as specified in rule 4(1) of CSR Rules;
 - The modalities of utilization of funds and implementation schedules for the projects or programs;
 - monitoring and reporting mechanism for the projects or programs; and
 - Details of need and impact assessment, if any, for the projects undertaken by the Company;
- ❖ Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect.
- ❖ To monitor the CSR Policy as approved by the Board from time to time.
- ❖ The CSR Committee should recommend the approach and direction of CSR activities to be undertaken by the Company and also provide Guiding principles for
 - Selection of CSR projects / programmes / activities
 - Implementation of CSR projects / programmes / activities
 - Monitoring of CSR projects / programmes / activities
 - Formulation of the annual action plan

CSR ACTIVITIES

The CSR activities may include –

- i. Eradicating hunger, poverty and malnutrition, [“promoting health care including preventive health care”] and sanitation 4[including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water.
- 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 centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.



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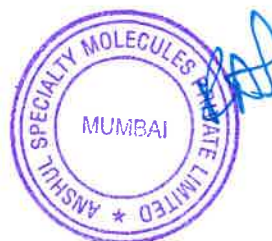
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- iv. ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water 4[including contribution to the Clean Ganga 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; promotion and development of traditional art and handicrafts;
- vi. 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];
- vii. training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
- viii. contribution to the prime minister's national relief fund 8[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;
 - (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
 - (b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- ix. rural development projects
- x. slum area development.
- xi. disaster management, including relief, rehabilitation and reconstruction activities.

APPROACH TO IMPLEMENTATION

- ❖ The Company will undertake CSR activities by itself or through a Company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities. Depending upon the nature of CSR projects the Company besides engaging its associate NGOs, shall partner with other credible NGOs, local/state/national level government bodies, panchayats, academic institutions, other corporate organizations as may be recommended by the CSR Committee and approved by the Board.



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- ❖ The Company shall on board new implementing partners based on the following criteria:
 - a) Have a permanent office/address in India;
 - b) Be a registered Charitable Public Trust or Society under Societies Registration Act or a Sec 25 Company (Registered under the Companies Act, 1956) or a Sec 8 Company (Registered under the Companies Act, 2013).
 - c) Have a track record of at least three financial years.
 - d) Have verifiable antecedents and verifiable credentials.
 - e) Maintains duly audited annual accounts.
- ❖ The implementing partners will be mandated to register themselves with the Central Government through CSR-1 form available with Registrar of Companies.
- ❖ To create sustainable impact of the developmental projects undertaken by the Company efforts will be taken to promote community participation and ownership by engaging key stakeholders of the community. Wherever possible successful community development projects will be replicated.
- ❖ The Company shall also actively participate in national development initiatives implemented through various Government schemes.
- ❖ The Company may engage Employee Volunteers in CSR activities and foster their sense.

MONITORING & EVALUATION

To ensure high standards of CSR deliverables CSR Committee may adopt multiple monitoring mechanisms which may involve:

- ❖ Periodical meetings with the implementing/partnering organizations to review, revise the course of action against the deliverables set and CSR expenditure incurred.
- ❖ Periodic field visits in project areas.
- ❖ Individual and focused group discussions with beneficiaries.
- ❖ Monitoring and review through MIS and exception reports.
- ❖ Evaluation of major projects may be undertaken through beneficiary/community.
- ❖ Satisfaction surveys/studies to map project outputs and outcomes.
- ❖ Evaluation of ongoing projects shall be carried after project completion.
- ❖ The Company may voluntarily conduct impact assessment on a periodic basis, either on its own or through an independent professional or professional institution, especially on the flagship programmers.
- ❖ CSR projects and activities to be reported every year in the Annual report in accordance with the new format as prescribed in the CSR Amendment Rules, 2021.



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CSR FUNDS & BUDGET

In alignment with The Companies Act, 2013 the Board shall ensure that the Company spends, in every financial year, at least two per cent of the average net profits of the Company made during the three immediately preceding financial years.

Any income or surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company and shall be ploughed back into the same project.

Excess amount spent on CSR activities can be used to set off against the CSR expenditure in the immediate three financial years with the Board passing a resolution to that effect.

If any amount is unspent from the allocated CSR funds, then the Company shall transfer the unspent amount to a government fund mentioned in Schedule VII.

If the unspent amount is from an ongoing project, the unspent amount can be transferred to the Unspent CSR Fund to be utilized in the next three financial years.

DISCLOSURE / REPORTING

The CSR Policy shall be displayed on the Company's website www.anshulspecialtymolecules.com

An annual report on the Corporate Social Responsibility shall be included in the Board's report.

REVIEW / AMENDMENT

The Board may amend, abrogate, modify or revise any or all clauses of this Policy, on recommendation of the CSR Committee and in accordance with the Act and the CSR Rules.

APPROVAL OF CSR POLICY AND IMPLEMENTATION

The CSR Policy has been approved by the Board at its meeting held on 11th March, 2022 on recommendation of the CSR Committee and is effective from 1st April, 2022.

