

FIBRO INDIA PRECISION PRODUCTS PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILTY (CSR) POLICY

CONTEXT

In **FIBRO INDIA PRECISION PRODUCTS PRIVATE LIMITED**, Corporate Social Responsibility is focused on enhancing the lives of the local community in which it operates by Promoting Different types of health, education services & Providing infrastructure & facilities for Health, education services activities. We strongly believe in contributing towards the betterment of society and endeavor to create a positive impact, while achieving our business goals. We understand that the profitable growth of our company depends on the economic, environmental, and social sustainability of our communities. And we know it is in our best interests to contribute to the sustainability of those communities.

During precedent years we have contributed for providing different types of health services & infrastructure & facilities for Health services through various trusts.

Further, pursuant to Section 135 of the Companies Act 2013, and Companies (Corporate Social Responsibility Policy) Rules 2014 every Company having net worth of Rs.500 Crores or more or turnover of Rs.1, 000 Crores or more or net profit of Rs.5 Crores or more during the immediately preceding financial year shall constitute Corporate Social Responsibility Committee ('CSR Committee').

This Policy on Corporate Social Responsibility (CSR Policy) has been formulated by the CSR Committee and then was recommended to the Board of Directors of the Company ('Board') for its approval. The Board at its meeting held on Wednesday, 3rd March, 2021 approved and adopted the CSR Policy with immediate effect.

The Companies Act, 2013 further provides that the Board of every company referred to into which Section 135(1) applies, shall ensure that the company spends, in every financial year, at least two percent, of the average net profits of the company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy;

Provided further that if the company fails to spend such amount, the Board shall, in its report made under clause (o) of the sub- section (3) of the section 134, specify the reasons for not spending the amount.

OBJECTIVES OF THE POLICY

This Policy shall be read in line with Section 135 of the Companies Act 2013, Companies (Corporate Social Responsibility Policy) Rules, 2014 and such other rules, regulations, circulars, and notifications (collectively referred hereinafter as 'Regulations') as may be applicable and as amended/notified from time to time and will, inter-alia, provide for the following:

- Establishing a guideline for compliance with the provisions of the Regulations to dedicate a percentage of Company's profits for CSR activities.
- Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.
- Volunteering will be encouraged for employees to participate in socially responsible initiatives.

DEFINITIONS

In this Policy unless the context otherwise requires:-

- 'Act' means Companies Act, 2013;
- 'Corporate Social Responsibility' means Corporate Social Responsibility (CSR) as defined in Section 135 of the Companies Act 2013 and Companies Corporate Social Responsibility Policy) Rules 2014;
- 'Ministry' means the Ministry of Corporate Affairs
- 'Net Profit' means net profit as defined in Section 135 of the Companies Act 2013 and Companies Corporate Social Responsibility Policy) Rules 2014 as set out below:

Net Profit as per financial statements prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:

- a) any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
- b) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act
- c) Words and expressions used in this CSR Policy and not defined herein but defined in the Act shall have the meaning respectively assigned to them in the Act.

CSR ACTIVITIES

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged by one or more of the following focus areas as notified under Schedule VII of Section 135 of the Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014:

Sr. No.	Activities
1.	Eradication of extreme poverty and hunger and malnutrition, promoting 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.	Promotion of education including special education and Employment enhancing vocation skill especially among children, women, elderly, and differently, abled and livelihood enhancement projects.
3	Promote Gender equality and woman empowerment, setting up homes and hostels, for women and orphans, setting up old age homes, day care Centre, and such other facilities for senior citizens, measures for reducing inequalities faced by socially and economically backward group.
4.	Ensuring Environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation 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 building, and sites of historical importance, and works of arts, setting up of public libraries, promotion, development of traditional arts and handicrafts
6.	Measure for the benefit of armed forces veteran, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Paramilitary Forces (CPMF) veterans, and their dependents including widows
7.	Training to promote rural sports, nationally recognized 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	<p>(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</p> <p>(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 Organisation (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).</p>
10	Rural development projects
11	Slum area development.
12	Disaster management, including relief, rehabilitation and reconstruction activities.
13	COVID-19 relief work/support in accordance with MCA guidelines

However, the company is initially focusing on the following activities out of above,

- Promotion of education including special education and Employment enhancing vocation skill especially among children, women, elderly, and differently, abled and livelihood enhancement projects.
- Eradication of extreme poverty and hunger and malnutrition, promoting 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.
- Rural development projects

- Ensuring Environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation 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.

CSR activities shall be undertaken as projects, programs or activities (either new or ongoing) excluding activities undertaken in pursuance of the normal course of business of the Company.

FOCUSED AREA FOR CSR

The Act provides that the Company shall give preference to the local area and areas around where it operates, for spending the amount earmarked for Corporate Social Responsibility. However, the Committee may identify such areas other than stated above, as it may deem fit, and recommend it to the Board for undertaking CSR activities.

CSR BUDGET

CSR Committee will recommend the annual budgeted expenditure to the Board for its consideration and approval. The Company would endeavor to spend not less than 2% of the average Net Profits of the Company made during the three immediately preceding financial years. The amount would be calculated as per the Regulations. The same may amended annually according to financial year after review by the committee or at such time, as the committee may deem fit. The Board of Directors of the Company may increase or decrease contribution at any time at its discretion but not less than above percentage as per Companies Act 2013

In implementing its CSR Projects, Company can undertake itself or through outside trusts, societies or companies only in India, provided that these have at least 3 years of track record of undertaking similar programs or projects; and the company has specified the projects or programs to be undertaken, the modalities of utilization of funds of such projects and programs and the monitoring and reporting mechanism. The Company may also collaborate with other companies for undertaking projects or programs or CSR activities provided that the Committees of the respective companies are in a position to report separately on such projects or programmes in accordance with these rules. The Company may build CSR capacities of their own personnel as well as those of their implementing agencies through

Institutions with established track records of at least three financial years but such expenditure "including expenditure on administrative overheads, shall not exceed 5%(five percent)of total CSR expenditure in that year.

COMPOSITION OF CSR COMMITTEE

The Corporate Social Responsibility Committee shall consist of two members as detailed below and of which one will act as Chairperson of the committee:

Sr. No.	Name of the Members	Designation
1.	Mr. Vivek Nanivadekar	Chairman
2.	Mr. Steffen Schroder	Member

Members are liable to change as per decision of the Board of Directors.

Committee shall meet at least once in each year to discuss the activities to be carried out in the financial year and to review the implementation of the object under the policy along with its effectiveness.

ROLE AND FUNCTIONS OF CSR COMMITTEE

The Committee will be responsible for

- Formulating the CSR policy in compliance to Section 135 of the Companies Act 2013.
- Identifying activities to be undertaken as per Schedule VII of the Companies Act.
- Recommending to the Board the CSR expenditure to be incurred.
- To carry out such other activities as directed by the Board of Directors of the Company and/or as deemed appropriate and expedient by the Committee for the furtherance of CSR objectives of the Company, in pursuance with the Regulations.

COMPLIANCE, MONITORING AND REPORTING

The CSR Committee shall prepare a transparent monitoring mechanism for ensuring implementation of activities to be undertaken by the company. Compliance with this policy will be continuously monitored and subject to review by the Board.

The CSR Committee will review activities of the Company and will provide progress and update to the Board of Directors as and when required. The Company will report in the prescribed format details of the CSR initiative to stakeholders as required under the regulations.

AMENDMENTS TO THE POLICY

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this Policy, as and when required as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Regulations on the subject as may be issued from relevant statutory authorities, from time to time.

This policy is subject to continuous review and updates from time to time.

On behalf of the Board of Directors of
Fibro India Precision Products Private Limited

Sd/-

Vivek Nanivadekar
Whole Time Director
DIN: 06573642

Address: Block No.2 Chintamani Heaven, Gandhi Path
Near Pinak Memories, Kothrud Pune 411029

Date: 10th September, 2024
Place: Pune