



CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Introduction:

Gulshan Polyols Limited (“GPL”) was incorporated under the Companies Act, 1956 on 20th October, 2000.

GPL has a vision to “Enhance Stakeholder value while adhering to the code of ‘Responsible Care’ and ethical values”.

To actualize this vision, GPL has set the following mission before itself through innovations, constantly endeavor to bring better products and processes that create greater value for the society and thereby ensuring:-

- Effective contribution to the society
- Value addition to the Stakeholders
- Growth and Development of its employees

GPL’s Corporate Social Responsibility (“CSR”) policy is –

“To remain a responsible corporate entity mindful of its social responsibilities to all stakeholders including consumers, shareholders, employees, local community and society at large”

Further, GPL endeavors to ensure increased commitment at all levels in the organization, to operate its business in an economically, socially and environmentally sustainable manner, while recognizing the interest of all its stakeholders.

2. Definitions:

Unless the context so requires, the terms used herein shall have meaning assigned herein:

- (i) “Act” means Companies Act, 2013.
- (ii) “Average Net Profit” shall have the same meaning as prescribed in Section 135 of the Act read with the Rules.
- (iii) “Board” shall mean Board of Directors of GPL.
- (iv) “CSR activities” shall mean the projects or programs or activities undertaken / to be undertaken by GPL as prescribed in Clause 5.



- (v) “CSR Committee” shall mean a Committee duly constituted by the Board pursuant to provisions of Section 135 of the Act.
- (vi) “CSR Policy” shall mean Corporate Social Responsibility Policy of GPL.
- (vii) “GPL” or “Company” shall mean GULSHN POLYOLS LIMITED.
- (viii) “Rules” means Companies (Corporate Social Responsibility Policy) Rules, 2014 as may be amended from time to time.

3. Scope:

The CSR Policy applies to the formulation, execution, monitoring, evaluation, and documentation of CSR activities in the target locations, in and around Company's offices and plants.

4. Aims and Objectives:

As a responsible corporate entity, GPL will consistently strive for opportunities to meet the expectation of its stakeholders by pursuing the concept of sustainable development with focus on the following:-

- a. Enhance the quality of life of the people in areas surrounding the plant and offices;
- b. Create a positive impact by making sustainable developments in the society and promote good environmental practices;
- c. Be responsible and responsive corporate citizen through endeavors to create a safe, harmonious and ecologically balanced environment for its members and the community at large.
- d. Maintain commitment to quality, health and safety in every aspect of the business and people;

5. Activities under Corporate Social Responsibility:

GPL would endeavor to adopt an integrated approach to address the community, societal & environmental concerns by taking up projects or programs relating to the following activities:

- (i) Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking;



- (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 centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- (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;
- (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 arts and handicrafts;
- (vi) Measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- (viii) Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- (ix) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) Rural development projects;
- (xi) Such other activities as are allowed under Section 135 of the Act read with the Rules.

6. Locations/Geography of CSR Activities:

The CSR activities will be primarily taken up in the immediate vicinities of GPL's plant and offices. Apart from immediate vicinity areas, CSR activities may also be taken up in urban, rural and tribal communities, wherein social engagement by GPL is warranted as per needs assessment.



7. Undertaking CSR activities

The CSR activities will be carried out either by GPL itself or any registered trust or a registered society or a company established under Section 8 of the Companies Act, 2013 (collectively hereafter referred to as “Agency”).

8. Implementation Mechanism

While identifying the CSR activities, GPL and Agency would consider the following broad parameters while selection of projects or programs:

- 8.1 Preference should be given to the local areas and areas where GPL has its plants and offices.
- 8.2 CSR activities should be undertaken as project or program based rather than in the form of donation, so as to create social impact and visibility.
- 8.3 While implementing the identified projects or programs, time frames and milestones should be predefined.

9. Planning and Co-ordination

- 9.1 The specific projects or programs will be identified and formulated based on need assessment surveys for identifying the specific areas of concern. Based on the survey, a detailed project or program report will be prepared by the Agency detailing the need for the specific project or program, time frame for implementation and budget.
- 9.2 GPL will prepare an annual plan for each year within the budgetary provisions and will be placed before the CSR Committee for recommendation to the Board for approval.
- 9.3 The target beneficiaries, the local authorities, professionals and institutions etc. involved in similar activities if need, may be consulted/ associated in the process of planning and implementation of the CSR activities.
- 9.4 Agency will hire professionals on need basis wherever considered necessary to plan and implement various projects.
- 9.5 The focus of delivering services /benefits will be in line with the CSR activities mentioned in this document and as per programs, projects and schemes approved.



10. **Budget for CSR activities:**

- 10.1 The CSR Committee shall, after the end of each financial year, recommend to the Board, the amount of expenditure to be incurred on the CSR activities.
- 10.2 The amount of such expenditure shall not be less than 2% of the Average Net Profits of GPL made during the three immediately preceding financial years.
- 10.3 GPL may build CSR capacities of its own personnel as well as those of their implementing agencies but such expenditure shall not exceed 5% of the total CSR expenditure of the Company in one financial year.
- 10.4 All administrative expenses including expenditure on wages and salaries, tours and travels, training and development of personnel deputed on CSR activities would be included in the amount of expenditure to be incurred on CSR activities.
- 10.5 The expenditure on CSR activities shall include all expenditure on projects or programs relating to CSR activities, but does not include any expenditure on an item not in conformity or not in line with CSR activities.
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- 10.6 Based on the total approved Budget, Managing Director of GPL would be authorized to allocate funds for different projects on the basis of identified CSR plans on yearly basis, under different budget heads for undertaking CSR activities.

11. **Monitoring Process of CSR Policy:**

- 11.1 GPL would be responsible for needs assessment of the surrounding locations, preparation of CDAP (Community Development Action Plan), implementation, reporting and monitoring on the physical and financial progress of the CSR activities on a regular basis.
- 11.2 Agency to form a team, comprising of such number of executives as may be required, in consultation with GPL, for implementation of CSR activities.
- 11.3 A group of members among compliance department and other departments at Corporate Office would be identified for coordinating CSR activities and related responsibilities.



- 11.4 The implementation and progress of CSR activities shall be regularly monitored by GPL management, preferably on a quarterly basis.
- 11.5 The CSR Policy shall be monitored by the CSR Committee from time to time, at least once in six months.
- 11.6 On advice of CSR Committee, selected CSR activities may be taken up for evaluation through an outside agency.
- 11.7 The CSR Committee would also provide required feedback and inputs to formulate and improve the projects or programs, from time to time, as per need and requirement.
- 11.8 Efforts will also be made to quantify the impact made by CSR activities, to the best possible extent, with the baseline data/existing status surveys developed before the start of any CSR activities.

12. Reporting:

- 12.1 A half yearly report on activities / projects identified / implemented shall be submitted to CSR Committee.
- 12.2 Based on the monitoring reports collected from Agency, the activities undertaken by GPL will be reported and form part of the Board's Report of GPL.
- 12.3 The Board of Directors of GPL will also be kept informed, from time to time, on the CSR activities undertaken by GPL.

13. General:

- 13.1 The surplus arising out of CSR projects or programs shall not form part of the business profits of GPL.
- 13.2 Any amendment or modification to the CSR Policy shall be approved by the Board on the recommendation of CSR Committee.
- 13.3 The contents of this Policy shall be disclosed in the Board's report and same shall also be displayed on the website of the Company.
