



AAK INDIA Private Limited  
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Hiranandani Estate, Ghodbunder Road,  
Thane (W) - 400607, Maharashtra, India

# CORPORATE SOCIAL RESPONSIBILITY POLICY

Change Effective from 11<sup>th</sup> March 2022

## CONTEXT

AAK India Private Limited (Formerly: AAK Kamani Private Limited) (“the Company”) is a Private Limited Company in India. This document articulates the Company’s Corporate Social Responsibility (CSR) Policy (the “Policy”). This Policy applies to all CSR activities of the Company in India and conforms to the requirements of Section 135 of the Companies Act 2013 (as amended from time to time), rules notified thereunder and any other applicable statutory provision(s) (collectively referred hereafter as “CSR Provisions”). The Policy is guided at all times by the Company’s Corporate Business Principles and the Code of Conduct.

The Company is India’s leading manufacturer of specialty oils and fats and since its inception, the Company’s intent is to make a positive difference to society. Company works towards implementing projects with greater impact on communities in which the Company lives and operates. This also includes creating better livelihood opportunities.

## SCOPE

This policy shall apply to all CSR projects/activities undertaken by the Company in India as per Schedule VII of the Companies Act 2013, rules notified thereunder and any other applicable statutory provision(s).

## TOTAL OUTLAY:

From April 1st, 2014, the Companies Act 2013 (the Act), the Company needs contribute at least 2% of the average net profits of the Company made during the 3 immediately preceding financial years specifically towards CSR initiatives. For this purpose, the net profit and average net profit shall be calculated in accordance with the provisions of section 198 of the Act read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

The Company may spend up to 5% of the total CSR expenditure in one financial year on administrative expenses relating to the general management and administration of CSR functions in the company.

The surplus arising out of the CSR activities will not be considered as a part of the business profits of the Company and shall be dealt with in accordance with the applicable CSR Provisions. Likewise, any excess amount spent on CSR activities may be set off against the requirement to spend in the succeeding financial years in accordance with the applicable CSR Provisions. In the event the



Company creates or acquires capital asset out of the CSR spend, such capital asset will be dealt with in terms of the applicable CSR Provisions.

Any unspent amount, other than unspent amount relating to an ongoing project, shall be dealt with in accordance with the applicable CSR Provisions.

#### **GOVERNANCE:**

The Company's CSR Governance structure is headed by the CSR Committee of the Board of Directors of the Company. This Committee reports to the Board of Directors of the Company. The CSR Committee consists of three directors. The CSR Committee provides oversight and guidance on CSR performance and monitor compliance with the CSR Policy, commitments, and the applicable CSR Provisions.

The CSR Committee formulates and recommends to the Board an annual action plan which includes the modalities of utilisation of the CSR funds and implantation schedules for the projects or programmes, monitoring and reporting mechanism for the projects or programmes and details of need and impact assessment, if any undertaken for the projects by the Company. The CSR Committee also recommends any alteration in the annual action plan at any time during the year and update, if any, required to the CSR Policy.

The Board monitors and reviews the performance and impact of the CSR programmes, provides input and course corrections if required and satisfies itself that the CSR funds so disbursed have been utilized for the purposes and in the manner as approved by it. The Directors or the appropriate Authority shall certify to the fact that CSR funds so disbursed have been utilised for the purposes and in the manner approved by the Board.

#### **CSR ACTIVITIES FOR IMPLEMENTATION:**

The Company may undertake any of the following activities as its CSR activities:

- **HUNGER, POVERTY, MALNUTRITION AND HEALTH:** Eradicating hunger, poverty and malnutrition, promoting health care including preventive healthcare and sanitation including contribution to the Swatch Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- **EDUCATION:** Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the different abled and livelihood enhancement projects;
- **GENDER EQUALITY AND EMPOWERMENT OF WOMEN:** promoting gender equality, empowering women, setting up homes and hotels 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 awkward groups;
- **ENVIRONMENTAL SUSTAINABILITY:** 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 the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;



- **NATIONAL HERITAGE, ART AND CULTURE:** 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;
- **RURAL DEVELOPMENT PROJECTS:** Strengthening rural areas and Slum areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.
- Measures for the benefit of armed forces veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympic, sports and Olympic sports;
- Contribution to the Prime Ministers 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;
- Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government.

Such other matters as may be prescribed under applicable statute and as may be thought fit by the CSR Committee and approved by the Board.

#### **CSR MONITORING AND REPORTING FRAMEWORK**

In compliance with the Act and to ensure funds spent on CSR Activities are creating the desired impact on the ground a comprehensive Monitoring and Reporting framework has been put in place.

The CSR Committee shall monitor the implementation of the CSR Policy through periodic reviews of the CSR activities.

The respective CSR personnel will present their annual budgets along with the list of approved CSR activities conducted by the Company to the CSR Committee together with the progress made from time to time as a part of the evaluation process under the monitoring mechanism.

#### **MEETINGS**

The meetings of the Committee could be held at such periodic intervals as may be required. Proceedings of all meetings must be minuted and signed by the Chairman of the Committee and tabled at the subsequent Board and Committee meeting

#### **AMENDMENTS**

This policy shall be updated from time to time, by the Company in accordance with the amendments, if any, to the Companies Act, 2013, rules made thereunder or any other applicable enactment for the time being in force.