

AMOD STAMPINGS PRIVATE LIMITED

Corporate Social Responsibility Policy

1. Corporate Social Responsibility (CSR) - Philosophy:

Amod Stampings Private Limited is committed to conduct its business in a socially responsible, ethical and environment friendly manner and to continuously work towards improving quality of life of the communities in its operational areas. This Policy provides guidance in achieving the above objective and ensures that the Company operates on a consistent and compliant basis.

The Company consistently strives for opportunities to conduct various activities under Corporate Social Responsibility (hereinafter referred to as “CSR”) as prescribed under the Companies Act, 2013 and the Rules / directions made thereunder. CSR is about the way in which the Company meets its wider economic, social and environmental obligations towards all stakeholders and society at large. It includes, but is not limited to sustainable development practices, corporate citizenship, corporate governance and business ethics. This is reflected in our actions and activities that have been conducted for the well-being of communities and environment, years before the Companies Act, 2013 guidelines came into effect.

2. Objective of Corporate Social Responsibility (CSR) Policy:

The main objective of Amod’s CSR Policy is to contribute towards sustainable development of the society, Create a positive influence in the communities and societies where we operate. Innovation, collaboration and impact define Amod’s social investments. ASPL envisions supporting genuine initiatives with an aim to promote and facilitate children to emerge as productive assets, to promote healthcare in rural areas for the purpose of improving the primary healthcare, to protect and conserve the environment on a sustainable basis, to develop rural areas so as to bring them at par with urban India and to promote the growth and development of the economically and socially weaker sections of the society and thereby, set a foundation for nation building.

3. Constitution of CSR Committee:

Keeping in line with section 135 of the Companies Act, 2013 and the rules thereunder (hereinafter referred to as ‘the Act’), the Board of Directors of the Company shall form a Corporate Social Responsibility Committee (hereinafter referred to as the ‘CSR Committee’. The CSR Committee consists of the following Directors:

Mr. Krupeshbhai Narharibhai Patel - Chairman
Mr. Niral Krupeshbhai Patel – Director
Mr. Tanmay Surendrbhai Patel – Director

The CSR Committee of the Company shall be responsible for:

- a) 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;
- b) To recommend the amount of expenditure to be incurred on the activities referred to in clause (a);
- c) To formulate and recommend an annual action plan in pursuance of CSR Policy covering the following aspects:
 - (i) the list of approved CSR projects or programs to be undertaken in areas or subjects specified in Schedule VII to the Act;
 - (ii) the manner of execution of such projects or programs as specified in rule 4(1) of CSR Rules;
 - (iii) the modalities of utilization of funds and implementation schedules for the projects or programs;
 - (iv) monitoring and reporting mechanism for the projects or programs; and
 - (v) details of need and impact assessment, if any, for the projects undertaken by the company;
- d) Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect.
- e) 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

- (i) Selection of CSR projects/programmes/activities
- (ii) Implementation of CSR projects/programmes/activities Guidance Note on Corporate Social Responsibility
- (iii) Monitoring of CSR projects/programmes/activities
- (iv) Formulation of the annual action plan.

4. Thematic Focus Areas:

The CSR activities we pursue will be in line with our stated Vision and Mission, focused not just around our plants and offices, but also in other geographies based on the needs of the communities. We intend to undertake CSR initiatives as permitted under section 135 of the Companies Act, 2013 and the related rules in following areas:

- 1) Eradicating hunger, poverty and malnutrition, promoting preventive health care including preventive health care and sanitation and making available safe drinking water;
- 2) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently able and livelihood enhancement projects;
- 3) 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;

4) Ensuring environment sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water;

5) Protection of national heritage, art and culture including restoration of building and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts;

6) Measures for the benefit of armed forces veterans, war widows and their dependents;

7) Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;

8) Contribution to Prime Minister' 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;

9) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

10) Rural Development projects

11) Slum Development areas

12) Such other activities as Board may consider deems fit.

In addition to the above thrust areas where the schemes would primarily be targeting villages and areas surrounding the factory premises, our CSR activities would also ensure that the benefits of the contributions reach far and wide. Thus, any schemes or funds which so benefit the backward, socially and economically inadequate and upliftment of women would also be the focus/target of our contributions.

5. Identification of CSR Projects:

CSR Projects shall be identified and planned for approval of the CSR Committee, particularly in Thrust Areas, with estimated expenditure and phase-wise implementation schedules.

The Company will ensure that in identifying its CSR Projects, preference shall be given

to the local area and areas around which the Company operates. However, this shall not prevent / bar the Company from pursuing its CSR objects in other geographical areas.

As a guiding principle, the CSR Projects in Thrust Areas shall be identified on the basis of a detailed assessment survey and feasibility study.

6. Implementation of CSR Projects:

The Company shall implement the identified CSR Projects by the following means:

Direct Method:	The Company may itself implement the identified CSR Projects presently within the scope and ambit of the Thrust Areas as defined in the Policy. The CSR Officer designate may engage external professionals/firms/agencies if so required, for the purpose of implementation of its CSR Projects.
Indirect Method:	The Company may implement the identified CSR Projects through Implementing Agencies/NGOs which are eligible to implement CSR projects as per section 135 of The Companies Act, 2013.
Participatory Approach involving beneficiaries	The Company may collaborate with other companies if required, for fulfilling its CSR objects through the Direct Method, provided that the CSR Committees of respective companies are in a position to monitor separately such CSR Projects

7. CSR Resource Contribution:

CSR Expenditure shall mean all expenditure incurred in respect of specific projects / programs relating to the approved CSR activities considering the following modalities:

- In every financial year, Amod shall contribute a minimum of 2% of its average Net Profits made during the three (3) immediately preceding financial years;
- CSR Expenditure shall not include expenditure on an item not in conformity or not in line with activities which fall within the purview of the CSR activities listed in Schedule VII; and

- CSR Expenditure shall not include Projects or programs, or activities undertaken outside India

8. Administrative Overheads:

Administrative overheads are classified as employee cost, utility, office supply, legal expenses & expenses incurred by the company for general management of CSR function. The company has defined the maximum permissible limits for administrative overheads as “5% of Total CSR Expenditure of the company in the given financial year”, in line with the CSR Rules.

9. Treatment of amounts in CSR (Surplus, excess amount spent, unspent amount):

Following treatment shall be met to the monies from CSR projects in line with the regulations set out by the Companies Law and decided by the company towards:

a. Surplus:

Surplus refers to income generated from the funds spent on CSR activities, e.g., interest income earned by the implementing agency on funds provided under CSR, revenue received from the CSR projects, disposal/sale of materials used in CSR projects, and other similar income sources. The company decides to redirect any surplus arising out of CSR towards its CSR activities only and will not use the same for any other business purposes. Treatment of surplus will be as per Rule 7 of CSR Rules.

b. Excess amount spent:

The company may choose to utilize any excess amount spent in CSR of a particular financial year by setting off the amount against the requirement to spend under section 135, in succeeding 3 financial years.

c. Unspent amounts:

There are two ways of utilizing the unspent amount based on the nomenclature of the project: -

Ongoing projects:

- The company will transfer the balance unspent amount within a period of 30 days from the end of the financial year to a special account to be opened by the company in any scheduled bank named as “Unspent Corporate Social Responsibility Account” and such amount would be spent within a period of 3 financial years from the date of such transfer;
- In case the unspent funds allocated to the unspent account do not get spent within a period of 3 years, the balance funds would be transferred to a

Fund specified in schedule VII of the Act within a period of thirty days from the date of completion of the third financial year.

One-time projects:

- In case of any unspent amounts, the CSR Committee/Board shall decide the way forward of utilization of the balance aligned with the provisions of the Companies Act, 2013. However, if there is any unutilized balance at the end of the Financial Year it needs to be transferred to a schedule fund within 6 months from the end of financial year.

10. Treatment of Capital Assets:

CSR amount may be spent by the Company for creation or acquisition of a Capital Asset, which shall however, be held by either:

- a) company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR registration number;
- b) Beneficiaries of the CSR Project, in the form of self-help groups, collectives, entities; or
- c) a public authority

11. CSR Reporting:

The Board in its Annual Report shall include the details of the CSR activities undertaken in the Financial Year. The particulars to be stated in the report shall be in accordance with the provisions of Section 135 of the Companies Act, 2013 read with CSR rules. Amod shall display on its website the contents of its CSR Policy and other information as may be required to be displayed. Amod shall mandatorily disclose the followings on its website:

- Composition of CSR Committee
- CSR Policy
- Projects approved by the Board

12. CSR Review:

Amod shall through its internal controls, monitoring and evaluation systems implement, assess, document and report the impact of its CSR activities/projects. Records relating to the CSR activities and the CSR expenditure shall be meticulously maintained. The records shall be submitted for reporting and audit.

The financial audits of the implementing agencies shall also be done through periodic audits. In this regard, Amod may appoint independent external consultants for carrying out such audits.

13. Amendments:

Words and expressions used but not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, the CSR Rules made thereunder or in any amendment thereto. This CSR Policy shall also be subject to such clarifications and FAQs as may be issued by Ministry of Corporate Affairs from time to time.

The Board reserve the right to amend or modify this Policy in whole or part, in accordance with any regulatory amendment or notification or otherwise, at any time without assigning any reason whatsoever. Any such amended Policy will be updated on the website of the Company.

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Composition of the CSR Committee

Sr. No.	Name of Committee Member	Position in CSR Committee	Position in the Board
1.	Mr. Krupeshbhai Narharibhai Patel	Chairman	Whole-time Director
2.	Mr. Niral Krupeshbhai Patel	Member	Director
3.	Mr. Tanmay Surendrabhai Patel – Director	Member	Director