



DANA Anand India Pvt Limited
(Formerly known as Spicer India Private Limited)
29 Milestone, Pune-Nashik Highway.
Village : Kuruli, Tal : Khed, Dist : Pune – 410501
Tel : +91 2135 301100 Fax : + 91 2135 301122

CIN: U34300MH1993PTC073227
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DANA ANAND INDIA PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Latest amended on - June 18, 2021



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1. PREAMBLE

- 1.1 In our efforts towards truly empowering the society, we at Dana Anand India, have undertaken a series of initiatives in the fields of education, skill development and rural development. By joining forces with Dana Care Foundation and SNS Foundation, we endeavor to contribute to societal development in towns and cities beyond plant locations. From creating a safer learning environment for students of government-run schools to empowering the differently abled, Dana Anand India has ensured a positive impact across all walks of life.
- 1.2 By prioritizing focus on education, skilling, entrepreneurship, and employment it seeks to help people and communities bridge the opportunity gap. The Company also supports health, wellness, water, sanitation, and hygiene needs of communities, especially those that are marginalized. With a slew of initiatives, Dana Anand India has been making concerted efforts at energising India's youth, especially in the rural areas, and thus contributing to nation-building.
- 1.3 It is wise for us to identify and associate with CSR assignments that create shared value, drive business growth, aid in employee alignment and improve the living conditions of the society. For global organizations like ours, this assumes even a greater importance as companies acting in different parts of the world face the challenge to be confronted with different cultures and value systems of their respective stakeholders and different conceptions about the focus and scope of corporate responsibility. Thus, the objective of CSR today is to systemically embed and integrate it at varying levels within our organization and make it a way of life
- 1.4 The Company's Corporate Social Responsibility ("CSR") Policy encompasses the philosophy for delineating its responsibility as a social corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare and sustainable development of the underprivileged group of Urban and Rural community
- 1.5 Pursuant to Section 135 of the Companies Act, 2013 (the "Act") and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the "Rules") framed thereunder, Corporate Social Responsibility ("CSR") is a company's commitment to contribute and operate in an economically, socially and environmentally sustainable manner.
- 1.6 Accordingly, it is a continuing commitment for a company to perform its operations ethically and contribute to economic development of the society at large. CSR, therefore, is not a mere philanthropic activity but also comprises of activities that



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require a company to integrate social, environmental and ethical concerns into its operations through such activities.

2. IMPORTANT DEFINITIONS

2.1 "Corporate Social Responsibility (CSR)" means the activities undertaken by a company in pursuance of its statutory obligation laid down in Section 135 of the Act in accordance with the provisions contained in the rules, but shall not include the following, namely: -

(i) activities undertaken in pursuance of normal course of business of the company. Provided that any company engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that-

(a) such research and development activities shall be carried out in collaboration with any of the institutes or organizations mentioned in item (ix) of Schedule VII to the Act.

(b) details of such activity shall be disclosed separately in the Annual report on CSR included in the Board's Report.

(ii) any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level.

(iii) contribution of any amount directly or indirectly to any political party under Section 182 of the Act.

(iv) activities benefitting employees of the company as defined in clause (k) of Section 2 of the Code on Wages, 2019 (29 of 2019).

(v) activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services.

(vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India.

2.2 "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in Section 135 of the Act.

2.3 "CSR Policy" means a statement containing the approach and direction given by the



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Board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

2.4 "Net profit" means the net profit of a company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely: -

(i) any profit arising from any overseas branch or branches of the company, whether operated as a separate company or otherwise; and

(ii) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act. Provided that in case of a foreign company covered under these rules, net profit means the net profit of such company as per profit and loss account prepared in terms of clause (a) of sub-section (1) of Section 381, read with Section 198 of the Act.

2.5 "Ongoing Project" means a multi-year project undertaken by a company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification.

3. AIMS & OBJECTIVES

3.1 DANA ANAND INDIA Private Limited (hereinafter referred to as "Company") shall continue to enhance value creation in society through its primary business, and in this context the aims and objectives of the CSR activities of Company, enumerated in Schedule VII to the Act, shall complement the primary business of Company with the overall social and environmental concerns related to its primary business.

3.2 In particular, and without prejudice to the generality of the foregoing, the key aims, and objectives of the CSR Policy are to:

- (i) ensure an increased commitment at all levels in the organization to operate its business in an economically, socially & environmentally sustainable manner.
- (ii) include guiding principles for selection, implementation and monitoring of the activities as well as formulation of the Annual Action plan.



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- (iii) take up such programmes, whether directly and / or indirectly, which benefit communities and result, over a period of time, in enhancing the quality of life & economic well-being of the local populace.
- (iv) generate, through its CSR initiatives, community goodwill for Company and help reinforce a positive & socially responsible image of Company as a corporate entity.
- (v) To develop sustainable projects through responsible business practices and good governance.
- (vi) encourage alignment with millennium development goals related to gender sensitivity, skill enhancement, entrepreneurship development etc.

4. CSR ACTIVITIES, PROJECTS AND PROGRAMME

- 4.1** The Company shall implement the CSR Policy in accordance with the requirements under Section 135 of the Act and the Rules framed thereunder, and the Company's CSR activities shall focus on below areas to create a sustainable and meaningful impact and to align with the Business Strategy of the Company:

A. Promotion of Education:

The first step in social transformation is "to think" and thinking comes from education and with thought process. The Company may undertake projects or programs, or activities aimed at the promotion of education from elementary to professional level to support the students belonging to weaker sections of the society by setting up new schools or helping the existing schools in development of their perspective and advocacy programmes to contribute to the social sector for sustainable development.

Further, the Company also intends to support Vocational Training Centers and Centers for physically challenged students, providing endowments or recognitions to successful candidates pursuing recognized examinations, scholarships or other forms of merit cum means assistance.

B. Empowerment of Women:

In India, the concept of empowerment flows from power. Empowerment of women would mean equipping women with necessary support to be economically independent, self-reliant, to have a positive esteem which would enable them to face any challenges or difficult situations and so that they can participate in developmental activities of the society as a whole.



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Company also intends to support women empowerment by developing SHG (Self Help Group) which would stand as a promising platform to women, launching campaigns for weaker sections of women, developing vocational and technical skill among women, funding their entrepreneurship projects, motivating deserving women in different fields and starting advocacy programmes to protect the rights and interests of women.

C. Promotion of Health Care:

India faces high burden of disease because of lack of environmental sanitation and safe drinking water, under-nutrition, poor living conditions and limited access to preventive and curative health services, lack of education, gender inequality and explosive growth of population. Economic deprivation in a large segment of population results in poor access to health care facilities. Addressing this challenge is essential to achieve the objective of inclusive growth which will be the commitment of the Company. Early diagnosis and treatment are the most cost-effective strategies for developing one's health. In line with this, women health issues will be the foremost priority of the Company.

D. Developing the source of pure drinking water specifically in rural area:

Rural India has more than 700 million people residing in about 1.42 million habitations spread over 15 diverse ecological regions. Meeting the drinking water needs of such a large population can be a daunting task. The non-uniformity in level of awareness, socio-economic development, education, poverty, practices and rituals and water availability adds to the complexity of the task. It is estimated that around 37.7 million Indians are affected by waterborne diseases annually. The government has undertaken various programmes since independence to provide safe drinking water to the rural masses yet there's a long way to go. In this respect the Company may design projects to contribute a hand towards developing source of pure drinking water in rural areas, especially Sanand, Gujarat where our Plant is located, and which is also water parched.

E. Skill development:

In a fast-growing Indian economy, there is a gap between the supply and demand for trained and skilled resources. In accordance with the Government of India's vision and policy on skill development, the Company would undertake programme's which would enable the youth to acquire employable market-oriented skills and will link them to potential employers, thereby facilitating the development of self-reliant and confident individuals.



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F. Environmental sustainability and community development projects:

Company may take up projects and programme's that assist in conservation of environment and its natural resources, disaster management and support ecological sustainability as part of its initiative towards developing a Healthy, Clean and Green India.

G. Technology / Research & Development Projects:

The term R&D is widely linked to innovation in the corporate world whether it might be government world or the public and private sectors. The Company with a holistic approach and the aim of enabling a strong skill development system, wherein the company may extend its contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities.

The above focus areas may be re-aligned, and new focus areas could also be incorporated, as and when deemed necessary, by the Company's CSR Committee.

5. RESOURCES, ALLOCATION OF FUNDS & TREATMENT OF UNSPENT AMOUNT

- 5.1** Every financial year, the CSR Committee shall recommend the plan along with budget allocation for CSR activities/ projects for that financial year and the Board of Directors, shall approve the same. The budgetary allocation will be based on the net profit of the Company, which shall not be less than 2% of the average net profits of last three financial years before tax of the Company (CSR budget).
- 5.2** The unutilised CSR budget for activities planned for a financial year will not lapse for Ongoing Projects and will be utilized during next financial year(s) as per provisions of the Act. The Company will disclose the reasons for not fully utilising the budget allocated for CSR activities planned for each financial year in terms of the provisions of the Act.
- 5.3** The annual budget earmarked for CSR activities shall have to be spent on implementation of activities in the project mode. The activities not implemented in project mode also have to be in conformity with these guidelines.
- 5.4** Such allocation of funds shall not act as a constraint in the event of a national calamity and the Company may contribute such amount as may be deemed necessary for a cause.



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- 5.5 Budgetary allocations to specified Projects may be enhanced or curtailed, as the case may be, by CSR Committee, if found necessary.
- 5.6 Any amount spent in excess of budgeted CSR obligations in a financial year, may be set-off against the CSR obligations of succeeding financial year(s) in terms of the provisions of Act.
- 5.7 Any surplus/income arising out of the CSR activities of the Company shall be ploughed back into the Project which is approved by the Board of Directors in terms of the provisions of Act.
- 5.8 Any amount remaining unspent pursuant to Ongoing Project(s)/ other than Ongoing Project(s) shall be dealt with & utilised as per the provisions of the Act.

6. CONSTITUTION OF CSR COMMITTEE

The CSR functions of Company will be coordinated and monitored by the CSR Committee as constituted by the Board from time to time for the successful implementation of the CSR Policy of the Company. The CSR Committee shall meet at least twice in a calendar year or as per the provisions of the Act.

7. RESPONSIBILITIES

7.1 CSR COMMITTEE:

The primary responsibility of the CSR Committee would be to implement the CSR Policy and broadly its roles and responsibilities are as follows:

- To assist the Board of Directors to formulate suitable policies and strategies to take the CSR agenda of the Company forward in the desired direction.
- Formulation of broad guidelines for selection of the projects, planning, execution, monitoring & evaluation.
- Selection of projects in accordance with Policy framework & guidelines.
- Submission of annual budgetary requirement for each project along with the targets.
- Subject to the provisions of the Act, recommend the locations for carrying out CSR activities.
- Formulation of strategies for efficient implementation of projects.
- Monitoring of progress of the work.



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- Strengthening monitoring mechanism to ensure that the funds allocated by the Company for CSR activities planned for a financial year are timely spent by the Company or through an implementing agency or a combination of both, as per Rule 4(1) of the Companies (Corporate Social Responsibility Policy) Rules, 2014.
- Formulation of Annual Action Plan.
- To recommend the Board to alter the Annual Action Plan during the financial year on the basis of reasonable justification informed by the Company.
- To recommend the amount of expenditure to be incurred on CSR activities and monitor the CSR Policy of the Company from time to time.

7.2 BOARD OF DIRECTORS:

The Board of the Company will be responsible for :

- Approving the CSR policy as formulated by the CSR Committee, with or without modifications.
- Considering the recommendations of the CSR Committee and providing appropriate instructions / directions to the CSR Committee when required.
- Taking into account the recommendations made by the CSR Committee and ensure that the activities as are included in CSR Policy are undertaken by the Company.
- 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 CSR Policy.
- Ensure that the CSR activities are undertaken by the Company or through an implementing agency or a combination of both, as per Rule 4(1) of the Companies (Corporate Social Responsibility Policy) Rules, 2014.
- Satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it.
- To review and approve the recommendations of CSR Committee.
- Identification of Ongoing Project on the basis of criteria and framework.
- Year wise allocation of funds.
- Monitoring the implementation of the Projects with reference to the approved timelines.
- Make modifications if required for smooth implementation of the project within the overall permissible time period.
- Disclosing in the Report of the Board. the names of CSR Committee members and ensure annual reporting of its CSR activities in the format as prescribed under the Act and the Rules framed thereunder.

The CSR decisions will be made as follows:



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- Company CSR committee gets recommendations from local teams, HR and any other groups within the company.
- CSR Committee evaluates all proposals and make recommendations to the board of the company.
- Company Board approves the recommendations and directs CSR funds to be paid into Dana Care Foundation and SNS Foundation.
- Dana Care Foundation collates all companies' funds and distributes them to the Board approved social and technical activities.
- Dana Care Foundation Advisory Board will decide overall CSR policy and Strategy for all the companies once a year.
- SNS Foundation collates all companies' funds and distributes them to the Board approved social and technical activities.

8. THE IMPLEMENTATION MECHANISM

8.1 Identification of Thrust Areas:

The thrust areas shall be identified by the CSR Committee on the basis of need identification studies (or) internal need assessment or receipt of proposals/requests etc which shall fall within the ambit of the Schedule VII of the Companies Act, 2013 and are also in compliance with the aims and objectives specified above. All efforts must be made, to the extent possible, to define the following while identifying the CSR projects:

- Programme objective
- Baseline survey
- Implementation schedule
- Responsibilities and Authorities
- Payment terms
- Major results expected and measurable outcome
- The activities would be taken up in a project mode with milestones and deadlines
- Criteria and framework for selection of Ongoing and Non-Ongoing Projects and Programmes
- CSR activity can be carried out at any location within the Country, including the backward regions, giving preference to the local areas where the Company operates

8.2 Execution:



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- CSR activities/ programmes will be undertaken by the Company or through an implementing agency or a combination of both, for the activities mentioned in Schedule-1 of this Policy.
- The Implementing agency shall fulfill the criteria prescribed under the act and shall be registered with the Central Government.
- CSR coordinator may be appointed by CSR committee who would be responsible for submitting the progress reports after review with the implementing agencies on projects approved in the identified thrust areas for consideration of the CSR Committee.
- The CSR amount may be spent by the Company for creation or acquisition of Capital Asset which shall be held by the entities prescribed under the Act.
- We could also seek the services of following communities or groups having an established track record of at least 3 years in carrying on the specific activity,
 - a. Community based organizations whether formal or informal.
 - b. Voluntary Agencies (NGOs).
 - c. Institutes/ Academic Organizations.
 - d. Trusts, Missions.
 - e. Self-help Groups.
 - f. Mahila Mandals/ Samitis.
 - g. Professional Consultancy Organizations.
 - h. Corporates with similar CSR Vision.

8.3 Annual Action Plan:

- CSR Committee shall formulate an Annual Action Plan for the Company which shall include the following:
 - a. List of CSR projects or programmes in areas or subjects specified in Schedule-VII of the Act.
 - b. Manner of execution of such projects or programmes.
 - c. Modalities of utilization of funds and implementation schedules for the projects or programmes.
 - d. Monitoring and reporting mechanism for the projects or programmes.
 - e. Details of need and impact assessment, if applicable, for the projects undertaken by the Company.



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- Annual Action Plan shall be recommended to the Board of Directors who may alter such plan at any time during the financial year based on the reasonable justification.

8.4 Monitoring, Evaluation and Impact Assessment of CSR Activities:

- CSR Committee shall be responsible for monitoring the implementation of projects and shall provide periodic reports to the Board of Directors and will ensure that the projects get completed within the specified time period.
- Annual certification on funds disbursement and utilization shall be certified by the Chief Financial Officer or the person responsible for financial management of the Company and shall be placed before the Board, as per the provisions of the Act.
- The impact assessment report, if applicable in terms of the Act, shall be placed before the Board of Directors and shall form part of Annual Report along with the CSR Report.

8.5 Documentation & Reporting:

- The CSR approach including the base-line data (wherever applicable) made available at the start of the project and the impact so quantified on completion of the project shall be documented for record purposes and future use as well as for sharing of experience.
- The CSR initiatives will be reported in the Annual Report of the Company, in the manner and form prescribed under the Act and Rules.

9. General

- 9.1** The power to interpret & administer the Policy shall rest with CSR Committee which is also empowered to make any supplementary rules/ orders to ensure effective implementation of this Policy.
- 9.2** Any or all provisions of the CSR Policy would be subject to revision/ amendment in accordance with the guidelines on the subject as may be issued by the Government, from time to time.

10. MISCELLANEOUS

- 10.1** The Company reserves the right to modify, add, delete or amend any of the provisions of this Policy.
- 10.2** This Policy will supersede/ override any previous Policy made in this regard.

SCHEDULE-1

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including 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.
- (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.
- (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 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 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.
- (ix) (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 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).

(x) rural development projects.

(xi) slum area development.

Explanation: For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

(xii) Disaster management, including relief, rehabilitation and reconstruction activities.

Ministry vide general circular No. 10/2020 dated 23rd March 2020 has clarified that spending CSR funds for COVID-19 related activities shall qualify as CSR expenditure. It is further clarified that funds may be spent for various activities related to COVID-19 under items nos. (i) and (xii) of Schedule VII relating to promotion of health care including preventive health care and sanitation, and disaster management.

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