

KINJAL ORGANICS PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Brief outline on Company's CSR Policy :

PREAMBLE

Corporate Social Responsibility (CSR) is linked to sustainability. Such decisions are mainly based on the social and environmental consequences. It is the Company's intent to make a positive difference to society.

FOCUS AREAS:

As a responsible corporate citizen, the company is committed to sustainable development and inclusive growth and has been focusing on a wide range of issues in relation to water, environment, healthy living, music, grass roots education, social advancement and promoting gender equality and empowerment of women. The company is planning to undertake CSR Projects in areas of providing access to water, promoting education (including special education) and employment enhancing vocation skills, ensuring environmental sustainability and rural development projects. Whilst the company will continue to primarily support activities in Schedule VII to the 2013 Act listed below, it will also simultaneously focus its activities in the areas of Water, Agriculture and Waste Management.

1. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the "Swachh Bharat Kosh" set-up by the Central Government for promotion of sanitation and making available safe drinking water.
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and differently abled 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 centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
4. Ensuring environmental sustainability, ecological balance, and 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" setup by the Central Government for rejuvenation of river Ganga.
5. 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.
6. Measures for the benefit of Central Armed Police Forces (CAPF) and Central Para Military 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) 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. (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)".
10. Rural development projects.
11. Slum area development ('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).
12. Disaster management, including relief, rehabilitation and reconstruction activities. Contribution made to State Disaster Management Authorities to combat COVID-19 or other Pandemics of similar nature.

CSR OBJECTIVES

The Corporate Social Responsibility Policy of **KINJAL ORGANICS PRIVATE LIMITED** (hereinafter referred to as "the Policy" or "CSR Policy") is being framed to align the Company's corporate social responsibility activities in accordance with the requirement under Section - 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014.

The objective of the CSR Policy is to contribute positively towards sustainable and inclusive growth of the society with focus on India's most pressing development challenges as highlighted under schedule - VII of the Companies Act, 2013 and as amended from time to time. The Policy shall apply to all the CSR projects, programs or activities (herein after referred to as CSR Activities) undertaken by the Company.

GOVERNANCE

Board-level CSR Committee –

The Board level Corporate Social Responsibility Committee (CSR Committee) of the Company shall be responsible for formulating and recommending to the Board the CSR policy and a CSR annual action plan, provided that the Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on reasonable justification to that effect. The CSR Committee reports to the Company's Board of Directors.

The members of the Board Level CSR Committee are MR. BHAVESHBHAI KIRTIBHAI PATEL (Director) and MR. KIRTIBHAI SHANTILAL PATEL (Director).

ACTIVITIES NOT CONSIDERED AS CSR:

The following shall “not be” considered as CSR activities:

- Activities undertaken in pursuance of normal course of business.
- Contributions made, if any, to any political party. Monies, if any, spent exclusively for the benefit of employees [as defined in clause (k) of section 2 of the Code on Wages, 2019) and their families].
- Activities, if any, undertaken outside India, except for training of Indian sports personnel representing any state or union territory at the national or international level
- Activities, if any, supported on “sponsorship basis” for deriving marketing benefits for its products or services.

CSR SPENDS:

The company is committed to spend 2% of its average net profits made during the immediately preceding three financial years on CSR activities every financial year. If during any financial year the company spends an amount in excess of 2% of its average net profits, the same will be considered as excess CSR spends for the financial year and will be set-off in the immediately succeeding three financial years subject to fulfilment of conditions prescribed under the 2013 Act and the CSR Rules, if the Board decides to do so.

IMPLEMENTATION:

The Company will take up its CSR Activities through eligible entity as defined under the CSR Rule 4(1), as amended, reproduced hereunder -

Rule (Eligible Entities- Rule 4(1):) of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021.

The Board shall ensure that the CSR Activities are undertaken by the company itself or through-

(a) A company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 established by the company, either singly or along with any other company, or

(b) A company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or

(c) Any entity established under an Act of Parliament or a State legislature; or

(d) A company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

The Company has constituted a CSR Committee of its Directors. The proposals of CSR Activities recommended by the CSR Committee will be placed before the Board of Directors for its approval.

CSR EXPENDITURE

CSR expenditure shall include all expenditure including contribution to corpus for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee.

SURPLUS ARISING OUT OF CSR ACTIVITIES

Any surpluses arising out of CSR projects or programs or activities shall not form part of the business profits of the Company.

PROCESS

The CSR Committee shall institute a transparent monitoring mechanism for implementation of the Corporate Social Responsibility projects or programs or activities undertaken by the Company and significantly higher engagement for the community.

MONITORING, EVALUATION AND REPORTING:

To ensure effective implementation of the CSR Activities within specified budgets and timeframes as approved by the Board, a monitoring mechanism will be put in place by CSR Committee. The progress of CSR Programmes under implementation and status of the work done shall be reported to the CSR Committee.

The CSR Committee will review periodically and keep the Board apprised of the status of the progress of implementation of the approved CSR Activities.