

**ICA PIDILITE PRIVATE LIMITED**  
**CORPORATE SOCIAL RESPONSIBILITY 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.

*The Company's CSR Policy has been developed in conformity with the provisions of Section 135 of the Companies Act, 2013 (referred to as the Act in this Policy) and in accordance with the CSR Rules (hereby referred to as the Rules) notified by the Ministry of Corporate Affairs, Government of India. Further this Policy is revised to conform with the amendments in the Act and the Rules.*

**Focus areas:**

The Company supports various bodies in carrying out activities in the areas of rural development, education, skill development, health care, general semantics etc.

**CSR Objectives**

To attain its CSR objectives in a professional manner and integrated manner, the main objectives are:

- (1) To promote, carry out, support activities relating to:  
Education and Training including in Science and Technology, Humanities etc; Healthcare; Welfare of Children, Women, Senior Citizens, and Differently Abled Persons; Employment enhancing Vocational skills; Sanitation; Water management; Agriculture; Horticulture; promotion of Culture; Art & Craft; Conservation of Natural Resources; Promotion and development of traditional Arts & Handicrafts; Employment Generation; Environment Sustainability; Science & Technology; Rural Development; Animal Welfare; welfare and development measures towards reducing inequalities faced by Socially and Economically Backward groups; and such activities may include establishing, supporting and / or granting aid to institutions engaged in any of the activities referred to above.
- (2) To conduct and support studies & research; publish and support literature, publications & promotion material; conduct and support discussions, lectures, workshops & Seminar in any of the areas covered above.
- (3) To promote, carry out, support any activities covered in Schedule VII to the Companies Act, 2013, as amended from time to time.

**Projects or Programs**

Various activities may be undertaken on the basis of objectives as set out herein as projects or programs.

Such projects or programs may be undertaken through a registered trust or registered society or a company established by the Company or by its holding or subsidiary Company or associate company or through such agencies with established track record of at least three financial years.

**Constitution of CSR committee:**

In accordance with subsection 9 of Section 135 of the Companies Act, 2013, the Company is presently not required to constitute CSR Committee. The Board of Directors of the Company shall discharge the functions of the Committee.

**Budget**

The Company proposes to spend 2% of the Net profit on Corporate Social Responsibility (CSR). Net Profit shall be calculated as per the provisions of Companies Act, 2013 or such other legislation as may be applicable from time to time.

**CSR expenditure**

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

**Surplus arising out of CSR activities**

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

**CSR ANNUAL ACTION PLAN (CAAP)**

The Board of Directors shall formulate, a CAAP in pursuance of this Policy, which shall include focus areas for the year, the list of projects to be undertaken, manner of execution, fund utilization, monitoring mechanism, etc.

The Board of Directors may further alter CAAP at any time during the financial year, based on the reasonable justification to that effect.

**Geographical Locations**

Considering the accelerated social benefit that will be derived if the Company focuses its activities in one geographical area /location, the Company proposes to undertake most of its Corporate social responsibility initiatives in the in Maharashtra and/ or Gujarat. This will not just exploit the benefits of synergy; it will also exploit the extensive groundwork and momentum of past CSR activities in and around the in Maharashtra and /or Gujarat.

**Process**

The Board 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.