

PUDUMJEE PAPER PRODUCTS LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. OBJECTIVE, APPROACH, DIRECTION & GUIDING PRINCIPLES:

Being a socially responsible business entity, the Company believes in giving back to the society which in so many ways has contributed to the Company's success and helped its business to grow.

The Company believes in the CSR activities through collaboration. The Company would always like to support the entities that are in the area of social service. The entities could be Trusts which have established track record in the activities which are covered by Companies Act, 2013 and the CSR Rules therein.

2. IMPLEMENTATION:

CSR initiatives will be implemented through M/s. Mahabir Prasad Jatia Charitable Trust or such other eligible Trust which undertakes the activities as mentioned in CSR Projects and which has an established track record of social service.

3. CSR PROJECTS:

Considering society's necessities and their relative importance the Company has finalized to focus in following areas in accordance with the Schedule VII of the Companies Act, 2013 in order to deliver maximum benefit to the society:

- a) Education in Rural Area;
- b) Environment both in Urban Area and Rural Area;
- c) Vocational Development in Rural Area;
- d) Setting up and/or maintaining old age homes/orphanage and supplementing nutrition and other essentials for underprivileged people
- e) Development of Rural Infrastructure;
- f) Poverty Alleviation and
- g) Any other activity permissible under Schedule VII of the Companies Act, 2013

The abovementioned Projects may also be ongoing project which includes Capital expenditure, Contribution towards corpus having such period not exceeding as mentioned in the Companies Act, 2013 and CSR Rules as are in force from time to time.

4. BUDGET:

- a) The Board of Directors of the Company will ensure that in each financial Year, at least two percent of the average net profit accrued during the three immediately preceding Financial Years, is spent on CSR projects.
- b) *In case of exigency the Company may spend such amount not exceeding Rs. 25 Lakhs in a year under any CSR Project in a Financial Year without prior approval of CSR Committee and Board of Directors of the Company. Provided that for such expenditure(s) the Company puts forward the detail of expenditure and circumstances thereof in the ensuing CSR Committee and Board of Directors meeting for their ratification.

*(*Inserted by an amendment approved by Board of Directors of the Company at their meeting held on 27.05.2024)*

5. LOCATION FOR CSR PROJECTS:

The Company operates in an Urban Area. Ordinarily preference should be given to the local area and areas around it where the Company operates, to the extent reasonably possible. However, in respect of project or expenses in Rural Area such a preference may not be practicable. Endeavor should be made to spend not less than 25% of total CSR Budget in the local area and areas around the Company.

6. GOVERNANCE & MONITORING OF CSR PROJECTS:

The Company has a well-defined structure to oversee the implementation of the CSR Policy and monitoring of CSR projects and whenever required midcourse corrections are initiated, as per the provisions of Section 135 of the Companies Act, 2013. The Company has constituted CSR Committee and details of the same as under:

CONSTITUTION OF CSR COMMITTEE:

SR. NO.	NAME OF COMMITTEE MEMBERS	DESIGNATION
1.	Mr. Nandan Damani (Non-Executive - Independent Director)	Chairman
2.	Mr. Basant Kumar Khaitan (Non-Executive - Independent Director)	Member
3.	Mr. Vinod Kumar Beswal (Non-Executive - Independent Director)	Member
4.	Mr. Surendra Kumar Bansal (Non-Executive – Non Independent Director)	Member
5.	Mr. Ved Prakash Leekha (Non-Executive - Non Independent Director)	Member

The Company Secretary shall act as the Secretary of the CSR Committee.

ROLE OF CSR COMMITTEE:

- Formulate and recommend to the Board a CSR policy which shall indicate the activities to be undertaken by the Companies in areas or subject, as mentioned aforesaid or in Schedule VII of the Companies Act, 2013.
- Recommend the amount of CSR expenditure to be incurred.
- Implement & Monitor the CSR policy & CSR Project of the Company from time to time.
- Formulate and recommend to the Board CSR Annual Action Plan of the Company.
- Any other matter/thing as may be considered expedient by the Committee to comply with the CSR Policy of the Company.

7. CSR ANNUAL ACTION PLAN (CSR Plan):

The CSR Annual Action Plan shall include the following:

- the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Companies Act, 2013;
- the manner of execution of such projects or programmes as specified in the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time;
- the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- monitoring and reporting mechanism for the projects or programmes and

- e) details of need and impact assessment, if any, for the projects undertaken by the company.

The Board of Directors of the Company may alter such CSR Plan or Policy as it deems fit at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

8. CSR REPORTING:

The information related to the CSR initiatives carried out by the Company will also be reported in the Annual Report of the Company.