

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. Ved Prakash Leekha (Non-Executive - Non Independent Director)	Chairman
2.	Mr. Basant Kumar Khaitan (Non-Executive - Independent Director)	Member
3.	Mr. Dilip Jayantilal Thakkar (Non-Executive - Independent Director)	Member
4.	Mr. Sanjay Kumar Singh (Non-Executive - Independent Director)	Member
5.	Mr. Surendra Kumar Bansal (Non-Executive - Non Independent Director)	Member

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

ROLE OF CSR COMMITTEE:

- a) 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.
- b) Recommend the amount of CSR expenditure to be incurred.
- c) Implement & Monitor the CSR policy & CSR Project of the Company from time to time.
- d) Formulate and recommend to the Board CSR Annual Action Plan of the Company.
- e) 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:

- a) 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;
- b) 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;

- c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- d) 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.

9. #CSR Partner Code:

The Company has adopted a CSR Partner Code applicable to all implementing agencies and CSR partners engaged for CSR activities. The CSR Partner Code enclosed with this CSR Policy, as amended from time to time, shall form an integral part of this CSR Policy and all CSR partners shall comply with the same.

#(Amended CSR Policy approved by Board of Directors at their meeting held on 22.05.2026)

PUDUMJEE PAPER PRODUCTS LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) PARTNER CODE

This Code is framed to lay down the code of conduct to be followed by every CSR Partner of the Company in relation to the planning, implementation, execution, monitoring, and management of CSR projects and programmes for which the Company has provided CSR funding, support, or resources, in accordance with the Company's CSR Policy and applicable laws.

For the purposes of this Code and all CSR engagements under the Company's CSR Policy, the term "CSR Partner" shall mean and include any implementing agency having valid certificate of CSR Registration from Ministry of Corporate Affairs, Government of India such as non-governmental organization (NGO), trust, society or Section 8 company etc. responsible for the planning, implementation, execution, facilitation, monitoring, management, or support of any CSR project, programme, or activity as per Company's CSR Policy.

The CSR Partner hereby agrees and undertakes to comply with the following binding principles, applicable to all CSR activities, projects, and engagements etc. under the Company's CSR Policy:

- 1. Eligibility & CSR Registration Requirements:** The CSR Partner must be validly registered with the Ministry of Corporate Affairs (MCA) and shall hold a valid CSR Registration Certificate, in accordance with the applicable CSR provisions under the Companies Act, 2013 and the CSR Rules framed thereunder. The CSR Partner shall have an established track record in social development and/or social service activities, with demonstrable experience in implementing projects falling under the permissible CSR categories as specified under the Companies Act, 2013 and Rules made thereunder, and/or projects of a similar nature and scale, supported by appropriate documentary and verifiable evidence.
- 2. Legal, CSR & Statutory Compliance:** The CSR Partner shall ensure full compliance with all applicable laws, rules, regulations, and statutory requirements, including CSR provisions under the Companies Act, 2013, applicable CSR Rules, and all regulatory and local authority norms, including provisions relating to unspent CSR amounts.
- 3. Ethical Conduct & Integrity:** The CSR Partner shall maintain the highest standards of honesty, transparency, integrity, and ethical conduct, with zero tolerance for fraud, misrepresentation, corruption, bribery, coercion, or unethical practices.
- 4. Financial Discipline, Transparency & Certification:** The CSR Partner shall utilize all CSR funds strictly for approved project purposes only, with proper accounting, documentation, and record-keeping. The CSR Partner shall provide a certificate from a Practicing Chartered Accountant in respect of the utilization of CSR funds, along with supporting financial statements, records, and documents, and shall ensure full traceability and transparency of fund utilization. The CSR Partner shall strictly adhere to the treatment and refund any unspent CSR amount to the Company at the end of Financial Year, in full compliance with Section 135 of the Companies Act, 2013 and the rules made thereunder, including applicable CSR Rules and statutory timelines.
- 5. Anti-Bribery & Anti-Corruption:** The CSR Partner shall not engage itself in any form of bribery, kickbacks, facilitation payments, inducements, or unlawful benefits, whether directly or indirectly.
- 6. Child Protection & Beneficiary Safety:** The CSR Partner shall ensure compliance with child protection, safeguarding, and beneficiary safety standards, with zero tolerance for abuse, exploitation, harassment, neglect, or unsafe practices.
- 7. Data Protection & Confidentiality:** The CSR Partner shall ensure protection of all confidential information, personal data, beneficiary data, institutional data, and project information, with no unauthorized access, disclosure, misuse, or transfer.

8. **Conflict of Interest:** The CSR Partner and its Office Bearers shall make full Disclosure and avoid of any actual or potential conflict of interest, personal benefit, or any situation that may compromise project integrity.
9. **Right to Inspection, Audit & Monitoring:** The Company through its employees or authorised representatives shall have the unrestricted right to inspect, audit, monitor, and verify all activities, records, documents, assets, financials, and utilization of CSR funds at any time.
10. **Indemnity & Liability:** The CSR Partner shall indemnify and hold harmless the Company and its officers against all losses, damages, claims, liabilities, penalties, and expenses arising from breach, negligence, misconduct, non-compliance, or misuse of CSR funds or assets.
11. **Termination & Remedies:** Any violation of this Code by the CSR Partner shall constitute a material breach, entitling the Company to suspend funding, demand corrective action, recover funds, and/or terminate the Agreement, without prejudice to any other legal, contractual, or equitable rights.
12. **Amendment & Modification:** This CSR Partner Code may be amended, modified, revised, substituted, or updated by Pudumjee Paper Products Limited from time to time, at its sole discretion, in accordance with applicable laws, internal policies, or governance requirements. Any such amendment or modification shall be binding upon the CSR Partner, and the CSR Partner shall be deemed to have accepted and agreed to comply with the revised Code in its entirety.
