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CORPORTATE SOCIAL RESPONSIBILITY POLICY

(This **CSR Policy** is extended and applicable to all existing and upcoming Units/ Establishments of **ROOP POLYMERS LIMITED**)

ROOP POLYMERS LTD. Registered office: Mezzanine Floor, 47, Community Centre, New Friends Colony, New Delhi South Delhi DL 110025 IN

Corporate Office: Plot No. 30, Sector 3, IMT Manesar, Gurgaon, Haryana (India), Pin: 122050 Tel: 0124-4610801-899 Fax: 0124-4369692 E-Mail: hrcorporate.manesar@rooppolymers.com URL: rooppolymers.com

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1. Preamble

- a. Roop Polymers Limited ('Company') has developed its Corporate Social Responsibility Policy ('Policy') in accordance with section 135 of the Companies Act 2013 and the rules made there under.
- b. The Policy shall apply to all CSR activities of the Company.

2. Introduction

With the introduction of the Companies Act, 2013 (Act) and the notification of Section 135 of the Companies Act, 2013 read with Schedule VII, which is dealing with Corporate Social Responsibility. Section 135 of the Companies Act is applicable to every Company with Net Worth of INR 500 Crore or more, or a Turnover of INR 1000 Crore or more, or a Net Profit of INR 5 Crore during the immediately preceding financial year, shall ensure that the company spends, in every financial year, at least two percent of the average net profits of the company during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.

3. Objective

The objective of this policy is to define Company's Corporate Social Responsibility (CSR) in conformity with the Section 135 of the Companies Act, 2013 read together with Companies (Corporate Social Responsibility Policy) Rules, 2014 and such other regulations, circulars and notifications as may be applicable and as amended from time to time.

As a responsible corporate citizen, the company shall focus on the following areas which are aligned to Schedule VII to the Companies, Act 2013:

- Education and Skill Development
- Health Care
- Environment

4. Definitions

In this Policy unless the context otherwise requires

- i. 'Act' means Companies Act, 2013
- ii. 'Corporate Social Responsibility' means Corporate Social Responsibility as defined in Section 135 of Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014
- iii. 'CSR Committee' means the committee constituted under the provision of Section 135 of the Act
- iv. 'Company' means Roop Polymers Limited

5. CSR Approach and Priorities

CSR activities will primarily be in the areas of providing environmental, educational support and to contribute towards Healthcare Facilities, extending Comprehensive Integrated Healthcare Services to the community.

To create a visible and lasting impact, the Company will focus on a few CSR programs rather than spreading resources over several projects.

The Company will undertake relevant and effective social projects to continuously work towards improving quality life of the communities in its operational areas.

The Company will encourage and recognise its employees for volunteering in the community by serving and sharing their expertise and skill.

The Company's CSR projects will be implemented like any other business activity, in a time-bound manner with clear objectives, plan, targets and robust monitoring and evaluation parameters.

6. CSR Activities Areas

The Company proposes to conduct the CSR activities through a Trust which shall undertake such activities for the benefit of the society and community in which Company operate.

The CSR initiatives shall include the following activities within the overall ambit of Schedule VII to the act, which may be changed from time to time as decided by the CSR Committee.

1. Education

In partnership with the local community and the government education department, the Company will upgrade infrastructure of Government schools and focus on improving the learning level and all-round development of students and youth in the communities.

The Company will offer scholarships to the meritorious students from underprivileged and economically weaker communities to help them pursue higher education and job oriented technical and vocational training.

The Company will also offer scholarships to children orphaned as a result of road accidents to support their education and training.

2. Health Care

The Company will assess the health care needs of the local community and undertake projects to provide health care facilities. The Company intends to touch a billion lives by reaching out to people from every walk of life to help them stay healthy. The objective is to promote wellness and not treatment. In line with this, under its CSR focus the company will aim to promote preventive healthcare in the most remote corners of the country with the aim of making quality healthcare accessible & affordable for all. To do this the Company will promote preventive healthcare through awareness campaigns in rural as well as urban areas Conduct free screening and diagnostics camps as part of promotion of preventive healthcare.

3. Environment

Company either its own or through its own trust or third party trust will work on environment, specially its surrounding area where its factories located. Activities include tree plantation, water conservation, educates locals about importance of environment, conduct environment awareness camp etc.

7. CSR Budget

The Board of Company shall ensure that in each financial year, the Company spends at least 2% of the average net profits made during the immediate three preceding financial years.

The unutilized CSR budget from the 2% of the average net profit will be parked in a CSR Fund (Corpus) created by the Company.

This Fund would also include any income arising there from and any surplus arising out of CSR activities. In case of any surplus arising out of CSR projects the same shall not form part of business profits of the Company.

8. Implementation

The Company's ongoing CSR projects will be aligned to the Policy. This Policy builds on the learnings and good practices of the CSR projects initiated by the Company.

The Company will enter into partnerships with the Government, business partners and communities to create multiplier effect of its social projects. The Company has set up dedicated teams for implementation of CSR projects. The mode of implementation will include a combination of direct implementation and implementation through trust/foundation/society/section 8 companies etc. set up by the Company and partners such as NGOs, business partners, registered societies etc. The Company will select its partners after appropriate due diligence.

The teams responsible for implementing the various CSR projects are mentioned in the section on the Governance Structure of the Policy.

9. Roles and Responsibilities

a. The Board:

The Board of Directors of the Company will be responsible for:

- > Approval of the CSR Policy of the Company.
- Disclosing the content of the Policy in its report and place the Policy on the Company's website in such a manner as prescribed under Section 135 of the Companies Act 2013 read with the CSR Rules.
- > Ensuring that the social projects included in the Policy are undertaken by the Company.
- Ensuring that the Company spends, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years in pursuance of the Policy.
- Ensuring that the Company gives preference to the local areas around its operations for spending the amount earmarked for CSR projects.
- Ensuring that it specifies the reasons in its report for not spending the earmarked amount in case the Company fails to spend such amount.
 - b. CSR Committee:
 - 1. **Composition of the CSR committee:** The composition of the CSR Committee of the Board is as under.

| S. No. | Name | Designation/Category | CSR Committee |
|--------|---------------|----------------------|---------------|
| 1 | Mr. Anil Jain | Managing Director | Chairman |

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| 2 | Mr. Hitesh Jain | Joint Managing Director | Member |
|---|-----------------|----------------------------|--------|
| 3 | Dr. Prem Kumar | Independent Director | Member |

The Board shall have the power to make any change(s) in the constitution of the Committee.

c. Responsibility of the CSR Committee:

Formulate and recommend the CSR Policy to the Board for approval. The Committee shall indicate the projects to be undertaken by the Company as specified in Schedule VII.

Monitor the Policy from time to time and recommend changes to the Board. Recommend the amount of expenditure to be incurred on CSR projects.

Institute a transparent monitoring mechanism for ensuring implementation of the social projects undertaken by the Company.

10. CSR Coordinating Team

1. Composition of the CSR Coordinating Team:

The Company's existing CSR & Sustainability Department under Corporate Planning Division will be the CSR Coordinating Team.

2. Responsibility of the CSR Coordinating Team:

Act as central coordinating point for the CSR implementing departments. Coordinate with the implementing departments for project designing in compliance with the section 135 of the Companies Act and the CSR Rules.

Plan annual budgets for CSR projects in coordination with the implementing departments and make a proposal to the CSR Committee.

Interface with various implementing departments within the Company to ensure effective implementation of CSR projects.

Report to the CSR Committee the progress on CSR projects and status of CSR expenditure half yearly.

Documentation and reporting of all CSR activities of the Company in pursuit of the Companies Act and the CSR Rules.

11. Monitoring and Reporting Framework

a. Project monitoring

The Company will institute a well-defined monitoring and evaluation mechanism to ensure that each social project has:

1. Clear objectives developed out of the societal needs that are determined through baselines studies and research.

2. Clear targets, time lines and measureable parameters wherever possible.

3. A progress monitoring and reporting framework that is aligned with the requirements of the section 135 of the Companies Act and the CSR Rules.

The CSR progress monitoring authorities and the frequency of review is given below.

| Sr. No. | CSR Progress Review and Monitoring Authority | Frequency of review |
|---------|---|---------------------|
| 1 | Board of Directors | Annualy |
| 2 | CSR Committee | Quarterly |
| 3 | Management | Monthly |
| 4 | Head Corporate Planning | Monthly |

b. Budget monitoring

1. The Company will establish an accounting system to ensure project wise accounting of CSR spends.

c. Reporting framework

1. The Company will monitor progress on CSR projects and CSR spend and report to the top management quarterly and the CSR Committee half yearly.

2. The Company will report CSR performance in its annual report as per the structure and format prescribed in the notified CSR Rules.

3. The Company will share its CSR performance with its various stakeholders through its annual Sustainability Report, media, conferences, brochures, short films etc.

12. Disclosure

As per the Section 135 of the Act read with CSR Rules, the prescribed details related to the Policy, CSR Activities undertaken and expenditure shall be disclosed in the Director's Report of the Company and its website.

13. Amendment to the Policy

The Board may subject to applicable laws amends any provision(s) or substitute any of the provision(s) or replace this policy entirely with a new policy. However no such amendments or modifications shall be inconsistent with applicable provisions of any law for the time being in force.
