



DEEPAK NITRITE LIMITED

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CIN: L24110GJ1970PLC001735

CORPORATE SOCIAL RESPONSIBILITY POLICY

[Adopted by the Board of Directors on 2nd May, 2014;

Last reviewed and amended by the Board of Directors on 5th May, 2021]

1. Introduction:

Deepak Nitrite Limited (“DNL”) was incorporated under the Companies Act, 1956 on 6th June, 1970.

DNL has a vision to “Enhance Stakeholder value while adhering to the code of ‘Responsible Care’ and ethical values”.

To actualize this vision, DNL has set the following mission before itself:

Through innovations, constantly endeavor to bring better products and processes that create greater value for the society and thereby ensuring:

- Effective contribution to the society
- Value addition to the Stakeholders
- Growth and Development of its employees

DNL’s Corporate Social Responsibility (“CSR”) policy is -

“To remain a responsible corporate entity mindful of its social responsibilities to all stakeholders including consumers, shareholders, employees, local community and society at large”.

Further, DNL endeavors to ensure increased commitment at all levels in the organization, to operate its business in an economically, socially and environmentally sustainable manner, while recognizing the interest of all its stakeholders.

2. Definitions:

Unless the context so requires, the terms used herein shall have meaning assigned to them in the Companies Act, 2013 (‘Act’) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (‘Rules’) read with Schedule VII to the Act, including any statutory modification or amendments thereof, for the time being in force.

3. Scope:

The CSR Policy applies to the formulation, execution, monitoring, evaluation, and documentation of CSR activities in the target locations, in and around Company’s office(s)

and plant(s).

4. Aims and Objectives:

As a responsible corporate entity, DNL will consistently strive for opportunities to meet the expectation of its stakeholders by pursuing the concept of sustainable development with focus on the following:

- ✓ Enhance the quality of life of the people in areas surrounding the plant and offices;
- ✓ Integrate social goals and to address the aspirations of the Stakeholders, in line with the practice of sustainable development and inclusive growth;
- ✓ Create a positive impact by making sustainable developments in the society and promote good environmental practices;
- ✓ Be responsible and responsive corporate citizen through endeavors to create a safe, harmonious and ecologically balanced environment for its members and the community at large.
- ✓ Maintain commitment to quality, health and safety in every aspect of the business and people;

5. Activities under Corporate Social Responsibility:

DNL would endeavor to adopt an integrated approach to address the community, societal & environmental concerns by taking up projects or programs relating to the following activities:

- (i) Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- (ii) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) 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;
- (iv) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;
- (v) 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;
- (vi) Measures for the benefit of armed forces veterans, war widows and their dependents;

- (vii) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- (viii) Contribution to the Prime Minister's National Relief Fund or 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;
- (ix) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) Rural development projects;
- (xi) Such other activities as are allowed under Section 135 of the Act read with the Rules and Schedule VII to the Act.

6. Guiding Principles on selection, implementation and monitoring of CSR activities:

A. CSR Expenditure:

The Board of Directors shall ensure that the Company spends such amount as may be required from time to time, towards carrying out CSR activities, as per the requirements of the provisions of the Act and Rules, for the time being in force, in pursuance of its Corporate Social Responsibility Policy.

B. Locations/Geography of CSR Activities:

The CSR activities will be primarily taken up in the immediate vicinities of DNL's plant and offices. Apart from immediate vicinity areas, CSR activities may also be taken up in urban, rural and tribal communities, wherein social engagement by DNL is warranted as per needs assessment.

C. Undertaking CSR activities:

The CSR activities will be carried out as per the requirements and in the manner as provided under the Act and Rules, either by DNL itself or through such other registered trust or a registered society or a company established under Section 8 of the Companies Act, 2013, subject to provisions of the Act and the Rules (collectively hereafter referred to as "Agency").

D. Implementation Mechanism:

While identifying the CSR activities, DNL and Agency would consider the following broad parameters while selection of projects or programs:

- (i) Preference should be given to the local areas and areas where DNL has its plants and offices.
- (ii) CSR activities should be undertaken as project or program based rather than in the form of donation, so as to create social impact and visibility.

- (iii) While implementing the identified projects or programs, time frames and milestones should be predefined.
- (iv) CSR activities may be based on fundamentals of sustainable development.

E. Planning and Co-ordination:

- (i) The specific projects or programs will be identified and formulated based on need assessment surveys for identifying the specific areas of concern. Based on the survey, a detailed project or program report will be prepared by the Agency detailing the need for the specific project or program, time frame for implementation and budget.
- (ii) DNL will prepare an annual plan for each year within the budgetary provisions and will be placed before the CSR Committee for recommendation to the Board for approval.
- (iii) The target beneficiaries, the local authorities, professionals and institutions etc. involved in similar activities if need be, may be consulted/ associated in the process of planning and implementation of the CSR activities.
- (iv) Agency will hire professionals on need basis wherever considered necessary to plan and implement various projects.
- (v) The focus of delivering services /benefits will be in line with the CSR activities mentioned in this document and as per programs, projects and schemes approved.

F. Monitoring Process of CSR Policy:

- (i) DNL would be responsible for needs assessment of the surrounding locations, preparation of CDAP (Community Development Action Plan), implementation, reporting and monitoring on the physical and financial progress of the CSR activities on a regular basis.
- (ii) Agency to form a team, comprising of such number of executives as may be required, in consultation with DNL, for implementation of CSR activities.
- (iii) A group of members among HR department and compliance department at Corporate Office would be identified for coordinating CSR activities and related responsibilities.
- (iv) The implementation and progress of CSR activities shall be regularly monitored by DNL management, preferably on a quarterly basis.
- (v) The CSR Policy shall be monitored by the CSR Committee from time to time as may be required.

G. Impact Assessment:

- (i) The CSR Committee would also provide required feedback and inputs to formulate and improve the projects or programs, from time to time, as per need

and requirement.

- (ii) Efforts will also be made to quantify the impact made by CSR activities, to the best possible extent, with the baseline data/existing status surveys developed before the start of any CSR activities.
- (iii) DNL shall undertake impact assessment, through an independent agency, of its CSR projects as per the requirements of the Rules.
- (iv) The impact assessment reports, if applicable, shall be placed before the Board and shall be annexed to the annual report on CSR.
- (v) The expenditure on impact assessment shall be booked as per the provisions of the Rules.

7. Annual Action Plans:

In line with the above guiding principles, the CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of the CSR policy, which shall include the following, namely:

- (a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- (b) the manner of execution of such projects or programmes as specified in the Rules;
- (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:

Provided that the Board may alter the Annual Action Plan at any time during the financial year, as per the recommendations of the CSR Committee, based on the reasonable justification to that effect.

8. Reporting:

- (i) A quarterly status report on spending on CSR activities / projects identified / implemented shall be submitted to CSR Committee or Board of Directors of DNL.
- (ii) Based on the monitoring reports collected from Agency, the activities undertaken by DNL will be reported and form part of the Board's Report of DNL.
- (iii) The Board of Directors shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect on an annual basis.

9. General:

- (i) Any amendment or modification to the CSR Policy shall be approved by the Board on the recommendation of CSR Committee.
- (ii) The Company shall disclose the composition of the CSR Committee, CSR Policy and Projects approved by the Board on its website, if any, for public access.
