

CORPORATE SOCIAL RESPONSIBILITY POLICY

AJIT INDUSTRIES PRIVATE LIMITED

1. PREAMBLE¹

As a corporate citizen, operating in a sustainable and responsible manner is our social responsibility. Whilst Ajit Industries Private Limited (“AIPL”) runs its business in line with the expectations of global stakeholders, it also takes its Corporate Social Responsibility (“CSR”) solemnly. AIPL is committed to understanding, managing and monitoring its social, environmental and economic impact to enable it to contribute to the society’s wider goal of sustainable development.

2. TITLE & APPLICABILITY

- 2.1 This policy encompasses the company’s philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for understanding socially useful programmes for education, welfare & sustainable development of the community at large. This policy is titled as the ‘Ajit Industries Private Limited CSR Policy’
- 2.2 This policy is in compliance of section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the Rules).
- 2.3 This policy shall be effective from the date of its adoption and approval by the Board of Directors of Ajit Industries Private Limited in their meeting.

3. DEFINITIONS

3.1 The words and expressions used in this Policy are defined as under-

- a) “**Act**” means the Companies Act, 2013.
- b) “**Board**” means Board of Directors of the Company.
- c) “**Company**” means Ajit Industries Private Limited.
- d) “**CSR Committee**” means the Corporate Social Responsibility Committee of the Board of Directors of the Company referred to in section 135 of the Act.
- e) “**Corporate Social Responsibility (CSR)**” means the responsibility of the Company to undertake the projects and programmes relating to the activities covered under the subjects enumerated in Schedule VII of the Act and approved by the Board in pursuance of recommendations of the CSR Committee.
- f) “**CSR Activities**” means the activities of the Company as per this Policy.
- g) “**CSR Rules**” means the Companies (Corporate Social Responsibility Policy) Rules, 2014 notified on 27th February, 2014 by the Government of India, Ministry of Corporate Affairs and any amendments thereof from time to time.

3.2 The words and expressions used and not defined in this Policy shall have the same meanings respectively assigned to them in the Act or CSR Rules.

4. CSR VISION STATEMENT AND GUIDING PRINCIPLES

²In accordance with the requirements of the Companies Act, 2013 (“Act”), the CSR activities at AIPL, amongst others, will focus on:

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of 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 centres 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
- 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 art and handicrafts;
- vi. Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- vii. Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports
- viii. Contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- ix. (a)Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- x. Rural development projects
- xi. Slum area development.

Explanation- For the purposes of this item, the term `slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

- xii. Disaster management, including relief, rehabilitation and reconstruction activities.

5. RESOURCES

5.1 FUNDING & ALLOCATION

For achieving its CSR objectives through implementation of meaningful & sustainable CSR programmes, AIPL shall endeavor to allocate the following as its Annual CSR.

Corpus:

- i. 2% of average net profits made during the three immediately preceding financial years, as prescribed under the Companies Act, 2013 and the Rules;
- ii. Any income arising there from; and
- iii. Surplus arising out of CSR activities.

It is clarified that surplus arising out of CSR projects/ programs shall not form part of business profits of the Company.

5.2 MODE OF IMPLEMENTATION

- a) CSR programs, projects or activities, will be implemented through one or more of the following methods:
 - i. Directly by the Company;
 - ii. Any other Registered Trust, Society or Section 8 Company (i.e. Company registered under Section 8 of the Companies Act, 2013) with an established track record of at least three years in carrying on activities in related areas and duly approved by the AIPL CSR Committee;
 - iii. In collaboration with other organizations.
- b) The allocated CSR budget or Corpus will be utilized for CSR activities undertaken within India, which are not:
 - i. exclusively for the benefit of employees of the Company or their family members; or
 - ii. Undertaken in pursuance of normal course of business of the Company.

6. CSR COMMITTEE

- 6.1 Ajit Industries Private Limited CSR Committee which will be ultimately responsible for the CSR projects undertaken will report to Board.

Members of CSR Committee shall be:

- 1. Mr. Ajit Kumar Gupta, Managing Director**
- 2. Mrs. Anjali Gupta, Director**

- 6.2 **Responsibilities**

- i. Formulate and update CSR policy of the Company as may be required from time to time, subject to the approval by the Board.

- ii. Suggest areas of intervention to the Board
- iii. Approve projects that are in line with the CSR Policy
- iv. Put monitoring mechanism in place to track the progress of each project
- v. Recommend the CSR expenditure to the Board.

7. IMPLEMENTATION

- 7.1 The time period for implementation of the programme will depend on its nature, extent of coverage and the intended impact of the programme.
- 7.2 CSR Programs shall be implemented with active participation of the local community, wherever possible, and in consultation with the State Government for policy and strategic purposes and local administration at village, block and district levels for operational purposes, wherever applicable. These implementations will also be synergized with the initiatives undertaken by the State Government, District Administration, Local Administration as well as Central Government Departments.
- 7.3 While identifying long term programmes, all possible efforts shall be made to define the following:
- a) Programme objectives
 - b) Baseline survey- It would give the basis on which the outcome of the programme would be measured.
 - c) Implementation schedules - Timelines for milestones of the programme.
 - d) Responsibilities and authorities
 - e) Major results expected and measurable outcome.

7.4 Powers for approval

- a) Corporate Social Responsibility Committee (CSR Committee) of the Board shall formulate and recommend to the Board a CSR policy of the Company for a Financial Year including the amount of expenditure to be incurred on CSR programs, projects and activities.
- b) The Board shall, after taking into account the recommendations made by the CSR Committee, consider and approve the CSR Policy as it may consider appropriate.
- c) The Board of Directors of the Company shall ensure that Company spends the requisite amounts specified under the Companies Act, 2013 on CSR activities failing which it shall specify in its report the reason for not spending the amount.
- d) The Board or CSR Committee shall delegate necessary powers for execution and implementation of the CSR Policy. The delegation shall also include powers for meeting the requirements arising out of immediate & urgent situations.

8. MONITORING AND FEEDBACK

To ensure effective implementation of the CSR programmes, the Company shall put in place, suitable monitoring mechanism.

- 8.1 The progress of CSR programmes under implementation will be reported to the Chairman, CSR Committee on quarterly basis.
- 8.2 CSR Committee shall periodically monitor the progress of CSR projects, programs and activities incorporated in the CSR Policy and shall hold review meetings at least twice in a year.
- 8.3 CSR Policy will be displayed on the Company's corporate website.

- 8.4 Annual report on CSR containing the particulars as prescribed under the Companies (Corporate Social responsibility Policy) Rules, 2014 shall form part of Annual Report of the Company.

9. GENERAL

- 10.1. In case of any doubt with regard to any provision of the CSR Policy and also in respect of matters not covered herein, a reference should be made to the CSR Committee.
- 10.2. The Company reserves the right to modify, cancel, add, or amend its CSR Policy subject to the provisions of the Companies Act, 2013 and Rules framed thereunder.

11. CONTACT

For queries related to this policy please write to us at cs@ajitindustries.com.

¹Amended via resolution passed by Corporate Social Responsibility Committee and Board of Directors in their meeting held on 14 July 2026

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