



VIPUL LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)

The Board of Directors ("the Board") of Vipul Limited ("the Company") has adopted this Corporate Social Responsibility Policy ("CSR Policy").

CSR OBJECTIVE

Vipul Limited recognizes that its business activities have wide impact on the society in which it operates. The Company practices its corporate value through its commitment to grow in a social and environmentally responsible way, while meeting the interest of its stakeholders.

The main objective of CSR Policy is to lay down guidelines for carrying out/undertaking Corporate Social Responsibility Activities ("CSR Activities/Projects") by the Company, in line with the requirements of the Companies Act, 2013 and rules made thereunder. The CSR policy will be monitored by the CSR Committee from time to time.

CSR COMMITTEE

Pursuant to the requirement of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("the Regulations"), the Company has constituted Corporate Social Responsibility Committee ("CSR Committee") consisting of the following Directors as its member:

1. Dr. Bidhubhusan Samal
2. Mr. Anil Kumar Agarwal
3. Mr. Rajesh Batra

TERMS & REFERENCE:

- Formulate and recommend to the Board, the CSR Policy which shall indicate the projects to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013, from time to time.
- Recommend the amount of expenditure to be incurred on CSR activities/projects.
- Monitor the CSR Policy from time to time and recommends the changes, if any, to the Board.
- Institute a transparent monitoring mechanism for CSR policy.
- Perform such other functions as may be required/specified from time to time.

CSR ACTIVITIES\PROJECTS

The Policy recognizes the Company's commitment towards holistic welfare of the Society by undertaking CSR activities within the ambit of Schedule VII of the Companies Act 2013, as amended from time to time.

CSR EXPENDITURE

CSR expenditure include all expenditure as may be permitted under the applicable laws, including contribution to corpus for CSR Activities/Projects approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Companies Act, 2013.

IMPLEMENTATION OF CSR ACTIVITIES

- The Company may undertake CSR activities through registered trust or a registered society or a company established by the Company or its holding or subsidiary or associate company under Section 8 of the Act or otherwise.
- The Company can carry out the CSR activities through any other trust or society or company which is not established by the Company or its holding or subsidiary or associate company provided that it shall have an established track record of three years in undertaking the similar programs or projects and the Company has specified the projects or programs to be undertaken by these entities, modalities of utilization of funds on such projects and programs and the monitoring and reporting mechanism.
- The Company may collaborate with other companies for undertaking the CSR activities subject to fulfillment of separate reporting requirements as prescribed in the Regulations.
- The CSR activities shall not include any activities undertaken by the Company in pursuance of normal course of business of the Company.
- The Surplus arising out of the CSR activities/projects shall not form part of the business profit of the Company.
- Any amount directly or indirectly contributed to any political party shall not be considered as CSR activities.

REPORTING

The Company will make following disclosures in its Board Report:

- Composition of CSR Committee.
- Contents of CSR policy and placing it on website of the company.
- Reason for not spending the CSR amount.
- CSR activities/projects undertaken by the Company and amount spent.
- Annual report on CSR activities as per annexure prescribed in the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

AMENDMENT

The Board may review and amend this policy from time to time subject to the recommendations of CSR Committee.