

# CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

**Oriental Trimex Limited**

## 1. Preamble

Oriental Trimex Limited recognizes its responsibility towards society and is committed to conducting business in an ethical and sustainable manner while contributing to the social, environmental and economic development of the communities in which it operates.

This Corporate Social Responsibility (CSR) Policy is formulated in accordance with the provisions of **Section 135 of the Companies Act, 2013** and the **Companies (Corporate Social Responsibility Policy) Rules, 2014**, as amended from time to time.

## 2. Objective

The objectives of this CSR Policy are to:

- Contribute to sustainable development of society
- Improve quality of life of communities
- Promote inclusive growth
- Undertake socially responsible initiatives aligned with national priorities

## 3. CSR Philosophy

The Company's CSR philosophy is based on:

- Ethical business practices
- Environmental sustainability
- Community development
- Social welfare and empowerment

CSR initiatives shall be undertaken in a transparent, measurable and impactful manner.

## 4. Applicability



This Policy shall apply to the Company as per the thresholds prescribed under Section 135 of the Companies Act, 2013 relating to:

- Net worth
- Turnover
- Net profit

## 5. CSR Committee

### 5.1 Constitution

The Board shall constitute a **CSR Committee** as per statutory requirements. The Committee shall comprise:

- Directors as prescribed under law
- At least one Independent Director, where applicable

### 5.2 Role of CSR Committee

The CSR Committee shall:

- Formulate and recommend the CSR Policy
- Recommend CSR activities and expenditure
- Monitor implementation of CSR projects
- Submit periodic reports to the Board

## 6. CSR Activities

CSR activities shall be undertaken in areas specified under **Schedule VII of the Companies Act, 2013**, including but not limited to:

- Promoting education and skill development
- Healthcare, sanitation and nutrition
- Environmental sustainability and conservation
- Rural development projects
- Women empowerment and livelihood enhancement
- Support to disadvantaged and marginalized communities

Preference shall be given to areas near the Company's operational locations.

## 7. CSR Implementation



CSR activities may be implemented through:

- The Company directly
- Registered trusts, societies or Section 8 companies
- Government or semi-government agencies
- Other eligible implementing agencies as per law

All implementing agencies shall be duly verified for statutory compliance.

## 8. CSR Expenditure

- The Company shall spend at least **2% of the average net profits** of the immediately preceding three financial years on CSR activities, as applicable
- CSR expenditure shall be in accordance with statutory guidelines
- Any unspent amount shall be dealt with as per provisions of the Act

## 9. Monitoring & Reporting

- CSR projects shall be monitored by the CSR Committee
- Periodic impact assessment shall be conducted where applicable
- CSR details shall be disclosed in:
  - Board's Report
  - Annual Report
  - Company website (if applicable)

## 10. Surplus from CSR Activities

Any surplus arising out of CSR activities shall:

- Not form part of business profits of the Company
- Be reinvested in CSR projects
- Be transferred to the Unspent CSR Account or a fund specified in Schedule VII, as applicable

## 11. General Guidelines

- CSR activities shall not be undertaken in the normal course of business
- Activities benefiting only employees and their families shall not be considered CSR
- Political contributions shall not be treated as CSR expenditure



## **12. Transparency & Ethics**

The Company shall ensure:

- Transparency in CSR implementation
- Ethical conduct by all implementing partners
- Proper documentation and record-keeping

## **13. Policy Review & Amendment**

- This Policy shall be reviewed periodically by the CSR Committee
- Any amendment shall be subject to approval by the Board of Directors
- In case of conflict, statutory provisions shall prevail

**For Oriental Trimex Limited**

