

CORPORATE SOCIAL RESPONSIBILITY POLICY

Preamble

Albert David Limited (ADL) believes that growth, success and progress of a Company are not reflected only by its balance sheet but also by its ability to make a positive difference in the lives of people. ADL tries to address the needs of people by taking sustainable initiatives in the areas of health, education, environment conservation, and infrastructure and community development.

At ADL, we do not limit ourselves in using resources only for profits but also engage in activities which enrich and enhance the lives of everyone around us. ADL's Corporate Social Responsibility (CSR) initiatives are continuous commitment to contribute to economic development and to improve the quality of life of humankind. Business decisions are based not only on financial factors, but also on social and environmental impact of such decisions.

Policy

ADL believes that the true measure of growth, success and progress of a Company lies in its ability to improve, enhance and enrich the lives of people. Through its social investments, ADL tries to address the needs of communities residing in the vicinity of its facilities.

The key features of the Corporate Social Responsibility Policy of the Company are:

1. To align with the Corporate Social Responsibility Rules framed by the Ministry of Corporate Affairs, the social investments of the Company would be broadly in the areas of health, education, environment conservation and sustainability, and social business projects.
2. CSR activities would be generally conducted as projects or programmes and would be activities relating to –
 - a. eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh setup by the Central Government for the promotion of sanitation and making available safe drinking water;
 - b. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
 - c. 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;
 - d. 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 setup by the Central Government for rejuvenation of river Ganga;
- e. 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;
 - f. Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces and Central Para Military Forces veterans and their dependents including widows;
 - g. Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces and Central Para Military Forces veterans and their dependents including widows;
 - h. training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
 - i. 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;
 - j. 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;
 - k. 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);
 - l. rural development projects.
 - m. slum area development.
 - n. Disaster management, including relief, rehabilitation and reconstruction activities.
 - o. Any other activities in relation of the above and all other activities which forms part of CSR as per Schedule VII of the Act, 2013 (the "Act") as amended from time to time. (Collectively referred to as "CSR Activities").
3. ADL may setup a Trust or Section 8 Company or Society or Foundation or any other form of entity within India in order to facilitate the implementation of its CSR projects and / or programmes.
4. ADL may also undertake the implementation of its CSR projects and / or

programmes through Trusts, Societies, or Section 8 Companies operating in India, which are not set by ADL, and who have an established track record of at least three years in carrying on activities in related areas. It should ensure that the entity covered above has obtained a unique CSR Registration Number from Ministry of Corporate Affairs.

5. The Board of ADL shall satisfy itself that the funds so disbursed have been utilised for the purposed and the manner as approved by it and the CFO or person responsible for financial management shall certify the same.
6. ADL may also collaborate or pool resources with its Group Companies or any other Company(ies) to implement its CSR projects and / or programmes.
7. The CSR Committee, constituted by the Board of Directors of the Company, would recommend to the Board of Directors, an annual action plan, the projects and / or programmes which are to be undertaken by ADL and shall also recommend the modalities of execution in the areas /sectors chosen and implementation schedules for the same;
8. Based on the recommendation of the CSR Committee, the Board of Directors of the Company shall decide upon the vehicle through which the CSR projects / programmes would be undertaken i.e., whether the projects and / or programmes are to be undertaken by ADL on its own or by pooling of resources or through a Trust or Section 8 Company or Society or Foundation, whether set up by ADL or not and operating in India, or in any combination thereof.
9. The implementation of the projects and /or programmes would be monitored as per the monitoring mechanism prepared and set up by the CSR Committee. The primary function of the monitoring mechanism would be to ensure that the allocations are spent for the intended purposes and are spent in India only. If applicable, the details of need and impact assessment for the projects undertaken by the company.
10. ADL may spent CSR amount for creation or acquisition of a capital asset, which shall be held by a Company established under Section 8 of the Act or Registered Public Trust or Registered Society, having charitable projects and CSR Registration Number or beneficiaries of the said CSR project or public authority.
11. The corpus for CSR projects and /or programmes would include 2 per cent of the average net profits of three immediately preceding financial years, any income arising there from and the surplus arising out of CSR activities.
12. Any surplus arising out of the CSR activities shall not form part of the business profits of the Company and the same shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six

months of the expiry of the financial year.

13. Any excess amount spend may be set off against the requirement to spend under Section 135 (5) of the Act up to such number of succeeding financial years subject to the conditions that the excess amount available for set off shall not include the surplus arising out of the CSR activities mentioned above and the Board of the company shall pass a resolution to that effect.
14. Any amount remaining unspent pursuant to any on going projects, after fulfilling such conditions as may be prescribed, undertaken by the company in pursuance of its CSR Policy, shall be transferred to Unspent CSR Account with in 30 days form the end of financial year and such amount shall be spent by the Company in pursuance of its obligation towards the CSR Policy within three financial years for the date of such transfer, failing which, the company shall transfer the same to a fund specified in Schedule VII, within 30 days from the date of completion of the third financial year.
15. ADL shall give preference to the local area and the areas around it where it operates, for spending the amount earmarked for CSR activities.
16. The Board's Report of the Company shall include an annual report on CSR containing particulars as specified by the Act and as amended from time to time.
17. The Company shall undertake impact assessment through an Independent Agency of their CSR projects having outlays of Rs. one crore or more if the CSR obligation of the Company exceeds Rs. 10 crore or more in the three immediately preceding financial years. The impact assessment report mentioned above shall be placed before the Board and shall also be annexed to the annual report on CSR. The Company undertaking impact assessment may book the expenditure towards CSR for that financial year, which shall not exceed five percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is less.
18. The Company shall disclose the composition of the CSR committee and CSR Policy and projects approved by the Board on its website.
19. This policy shall, overall, be governed by Companies (Corporate Social Responsibility Policy) Rules, 2014 as may be amended from time to time.

Passed in the Board Meeting held on 19-05-2023

Place: Kolkata.