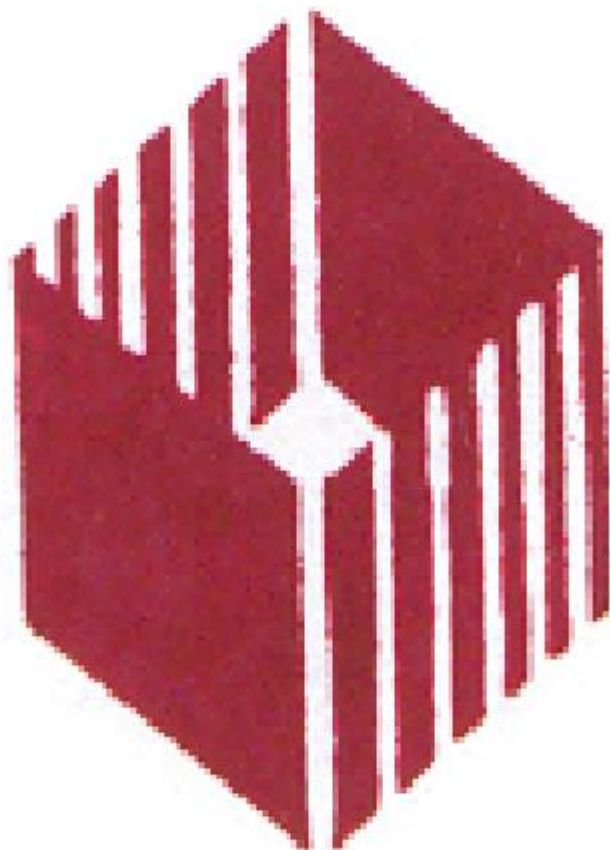


Rubber Park India (P) Ltd



CORPORATE SOCIAL RESPONSIBILITY POLICY

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CORPORATE RESPONSIBILITY POLICY

1. INTRODUCTION TO COMPANY

Rubber Park India P Ltd, established in 1997, is a company jointly promoted by Rubber Board, a central autonomous body formed under Rubber Act, 1947 and Kerala Industrial Infrastructure Development Corporation (KINFRA), formed under Kerala Industrial Infrastructure Development Act, 1993 with a total equity capital of Rs. 20 Crore. The objective of the company is to provide world class infrastructure for rubber and rubber wood-based industries.

The Park is situated at Airapuram near Perumbavoor in Ernakulum District. The total area of the Park is 110.03 Acres and out of this 107.52 Acres was leased by Kerala Industrial Infrastructural Development Corporation to Rubber Park for setting up an industrial estate. The company had also received an area of 2.51 Acres free hold land by way of gift deed and sale deed. The company has not incurred any cost on the above transactions and the company has leased this entire 2.51 Acres to Positive Chipboards India P Ltd. The land is divided into site A and site B. The company is constructing the second Rubber Park at Piravanthoor in Kollam District on 20 Acres and land development is under progress.

Activities of the Company

The company is a distribution licensee under the Electricity Act, 2003 and distributes electricity to the lessees of the company. Company also provides following services to the lessees: Effluent treatment, Renting of guesthouse, Dormitories, Conference Rooms, Provision of water, and Testing and certification facility.

Capital break-up and Audit of the company

The paid-up capital of the company is Rs. 200,000,000. The Rubber Board and Kerala Industrial Infrastructure Development Corporation (KINFRA), each holds fifty percent shares in the company. The company is covered under section 139(5) of the Companies Act, 2013 and subject to supplementary audit by Comptroller and Auditor General of India.

2. POLICY

2.1 APPLICABILITY AND OBJECTIVES

Pursuant to the provisions of Section 135 of the Companies Act, 2013 and Corporate Social Responsibility Rules, 2014 made thereof, every Company during the immediately preceding financial year has turnover of Rs.1000 Crores or more or net worth of Rs.500 Crores or more or net profit of Rs.5 Crores or more is required to constitute a Corporate Social Responsibility Committee (hereinafter referred to as "CSR Committee") which shall frame and recommend to the Board, a CSR Policy indicating the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013 or any amendment from time to time.

As and when the Company falls within the purview of the above, the Company has to spend 2% of the Average Net Profit of 3 immediately preceding financial years of the Company on CSR as per the Act.

However, where the company falls below the threshold limit for 3 consecutive years the requirement for constitution of the Corporate Social Responsibility Committee shall not be applicable. In case the company has failed to spend the two per cent of the average net profit of the last three financial years or any part thereof, the company shall provide the reasons for not spending the amount in its Board report.

CSR Policy intends to:

- build a framework of CSR activities with a philanthropic approach in line with business unit objectives, which also benefits the organization at large;
- shape sustainability for the organization by 'Engaging the Community';
- build a corporate brand through CSR; and
- for other stakeholders, make it "an integral part of the Company's DNA, so much so that it has to be an organic part of the business".

- strive for economic development that positively impacts the society at large with minimal resource footprint.

- embrace responsibility for the Company's actions and encourage a positive impact through its activities on hunger, poverty, malnutrition, environment, communities, stakeholders and the society.

2.2 FOCUS AREAS

In accordance with the requirements under the Companies Act, 2013, CSR activities of the company, amongst others, will focus on but not limiting to the following areas :

1. eradicating hunger, poverty and malnutrition, promoting healthcare 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;
2. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
3. promoting gender equality and 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;
4. 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.
5. protection of national heritage, art and culture including restoration of building and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
6. 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;
7. training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
8. Contribution to various funds e.g. Prime Minister's National Relief Fund, PM CARES Fund towards COVID relief / contribution made to State Disaster Management Authority to combat COVID-19, any other fund set up by the Central Government for : socio-economic development and relief or for the welfare of Scheduled Castes, the Scheduled Tribes, other Backward classes, minorities and women

9. contribution or funds provided to technology 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;
10. 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).
11. rural development projects;
12. 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 other State Government or any other competent authority under any law for the time being in force;
13. Disaster management, relief, rehabilitation and reconstruction activities;
14. any expenditure made from CSR funds for COVID-19 related activities for various activities related to COVID-19 specified under Schedule VII relating to promotion of health care, including prevention of health care and sanitization and disaster management.

2.3 GUIDING PRINCIPLE

1. Discretion with respect to the selection and implementation of CSR activities to be exercised judiciously by the Board/Committee to ensure that assistance is extended for worthy causes .
2. Request for donations from institutions having caste/ religious/ communal bias and /or political overtones will not to be considered.
3. Preference will be given to local areas or areas around which the

Company operates, however, the Board may decide on the locations of the CSR activities and extend to other geographies based on needs of the communities.

4. CSR activities shall be undertaken in project / programme mode i.e. expenditure on events such as marathons, awards, advertisements, sponsorships of TV programmes etc. shall not be considered as CSR expenditure. Expenses incurred by the Company for fulfillment of any obligation under any other legislations or statute (such a labour laws, land acquisition etc.) would not count as CSR expenditure under the Act.
5. Endeavor be made that donations are made to institutions/NGOs eligible for tax exemptions, i.e. institution/NGOs should have income-tax exemption certificate, so that Company can claim tax exemption or Section 8 Companies or Trusts or Societies which are exclusively created for undertaking CSR activities or where the corpus is created exclusively for a purpose directly relatable to a subject covered in Schedule VII of the Act.
6. The following activities shall not form part of the CSR activities of the Company:-
 - a) Activities undertaken in pursuance of normal course of business of the Company
 - b) CSR projects/programs or activities that benefit only the employees of the Company and their families,
 - c) Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes and
 - d) Any CSR projects/programs or activities undertaken outside India, except for training of Indian sports personnel representing any State or Union territory at national or India or international level
 - e) Activities supported on sponsorship basis for deriving marketing benefits;
 - f) Activities carried out for fulfilment of any other statutory obligations under any law in force in India;

2.4 UNDERTAKING CSR ACTIVITIES

Company will undertake its CSR activities, approved by the CSR Committee. CSR programmes for each financial year as may be identified by the Company will be reviewed by the CSR Committee and recommend to the Board for approval. After Board's approval the CSR programme shall be implemented. Any change in such programme shall be approved by the Board. For meeting the requirements arising out of immediate and urgent situations, CSR Committee is authorised to approve the proposals in terms of the powers accorded to the Committee by the provisions of the Companies Act, 2013.

The surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the Company and 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.

2.4.1 ANNUAL ACTION PLAN

The CSR Committee shall formulate and recommend to the Board the annual action plan which shall include:

- (a) the list of CSR projects or programmes that are approved to be undertaken
- (b) the manner of execution of such projects or programmes;
- (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:

2.5 COMPOSITION OF CSR COMMITTEE

For the proper management of CSR activities of Company and smooth functioning, the Company has constituted a CSR Committee. The CSR Committee shall be constituted with three or more directors, as appointed by the Board. The powers and functions of the committee to be determined and altered from time to time by the Board.

- The Committee members shall be appointed by resolution of the Board. Each member shall continue as a member until a successor is appointed, unless the member resigns, or is removed by resolution of the Board or otherwise ceases to be a member of the Board.
- Where a vacancy occurs at any time in the membership of the Committee, it shall be filled by the Board.
- A member of the Committee shall serve until such member resigns, retires or is removed from the Committee by the Board. The Board may fill any vacancy in the Committee by appointment from amongst the Directors of the Company.
- The Board, or in the event of its failure to do so, the Committee, shall appoint a Chair from among the Committee members. If the Chair of the Committee is not present at any meeting of the Committee, the Chair of the meeting shall be chosen by the Committee from among the members present.
- Each Committee member is entitled to one vote and questions are decided by a majority of votes. In case of an equality of votes, the Chair of the meeting has a casting vote.
- The Committee shall assist with deliberations required for the fulfillment of the Board's mandate and those specific responsibilities and duties assigned to the Committee; however, unless specifically stated otherwise, the Committee shall act in advisory capacity only, recommending decisions to the Board for approval.
- The Committee shall meet at least twice a year and otherwise as required. Ad-hoc meetings may be held from time to time. A meeting of the

Committee may be called by the Chair of the Committee, the Chair of the Board or Managing Director of the Company or by any two (2) members of the Committee. Quorum for meetings shall be two (2) Directors, out of which one shall represent the Rubber Board and the other representing KINFRA present in person or by telephone or other telecommunications device that permits all persons participating in the meeting to speak and hear one another.

2.5.1 RESPONSIBILITIES OF THE COMMITTEE

The responsibilities of the CSR Committee include:

- Formulating and recommending to the Board of Directors an annual action plan in pursuance of its CSR policy, which shall include the following, namely:-
 - (a) the list of CSR projects or programmes that are approved to be undertaken.
 - (b) the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
 - (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
- Recommending the amount of expenditure for the CSR activities, and
- Monitoring CSR activities from time to time.
- Any other matter as the Corporate Social Responsibility Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors from time to time.
- The committee may constitute/ re-constitute an “implementation group” which is assigned with the task of implementing CSR activities as approved by the board from time to time.

2.6 DELIVERY MECHANISM

CSR initiatives will be implemented either directly by the Company through CSR Committee authorized implementation programme, where the company will directly implement the CSR projects, or through implementing partners which include a company established under section 8 of the Act, or a registered public trust or a registered society having an established track record of at least 3 years in undertaking similar activities for which the grant is being given. These organizations would need to be registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961). The above entities shall register with the Central Government by filing the form CSR-1 electronically with the Registrar, with effect from the 1st April 2021. The Company may engage International Organisations (as defined in Clause 2(g) of the Companies (Corporate Social Responsibility Policy) Rules 2014) for designing, monitoring, and evaluation of CSR Projects as well as capacity building of their personnel. The Company may also collaborate with other companies to undertake CSR projects, provided the CSR Committees of the respective companies are able to report separately on such projects.

2.7 BUDGET

- a) The Board of the company will ensure that minimum of 2% of average net profit of the last 3 years is spent on CSR initiatives undertaken by the company.*
- b) All expenditure towards the programs to be diligently documented
- c) If the Company spends in excess of the minimum amount, the Company may set off such excess amount against the amount required to be spend in succeeding year, subject to following:
 - (i) the Board shall pass resolution to that effect and
 - (ii) the excess amount available for set off shall not include the surplus arising out of the CSR activities

d) Any surplus generated out of the CSR activities not to be added to the normal business profits of the company and 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 of the Companies Act, 2013, within a period of six months of the expiry of the financial year.

e) If the Company fails to spend the amount as stipulated in any financial year, the unspent amount shall be transferred to the prescribed Fund prescribed under the Act or the Unspent Corporate Social Responsibility Account to be opened by the company to be used in the manner prescribed in the Act and the reason(s) for not spending the same will be provided in the Directors' report of the Board.

2.8 MONITORING, ACCOUNTING AND REPORTING

The Board shall have a transparent monitoring mechanism for implementation of CSR projects undertaken, utilization of funds donated and shall ensure end use of funds for the purpose for which they are sanctioned. A detailed account of all expenditure (direct and indirect) including contribution to corpus for projects or programs relating to CSR activities approved by the Board and as per CSR policy will be presented to the Board on a half yearly basis. The management will also present periodical report to the Board on the utilization of CSR money sanctioned, and other CSR related matters during the year. Any surplus arising out of CSR projects /programs / activities shall not form part of the business profit of the Company and will be redeployed for CSR activities or shall be transferred to the Unspent Corporate Social Responsibility Account and spent in the manner approved or to a Fund prescribed under the provisions of the Act. The Chief Financial Officer of the Company or person responsible for financial management shall ensure and certify that the funds are utilized as approved by the Board. In case of ongoing project, the Board/ CSR Committee shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications,

if any, for smooth implementation of the project within the overall permissible time period.

The Board's report of the company shall include an annual report on Corporate Social Responsibility containing particulars of the CSR Activities in the manner as specified in Corporate Social Responsibility Rules, 2014. The Companies are required to display CSR activities on their website and to disclose the following:

- the composition of the CSR-Committee,
- CSR Policy and
- Projects approved by the Board for public access.

2.9 DOCUMENTATION

Meticulous documentation of projects/programs is the only way to ensure that progress is continuously tracked, course corrections are provided, lessons learnt and objective feedback received. Good quality documentation enables the company to effectively address questions and queries and also to prepare instructive and good quality case studies. Keeping this end in sight, the company will endeavor at all times to put in place, for all projects/programs, an effective documentation process.

The company shall maintain and record all the minutes of the committee meetings and it shall be kept at the registered office of the company. The stakeholders as specified in the Companies Act, 2013 of the company shall have access to the minutes during the office hours . The minutes of the Committee meetings shall be placed at the next Board meeting for approval. The Annual Report and Annual Return of a company shall disclose the number and dates of Meetings of the Committee held during the financial year.

2.10 EFFECTIVE DATE

The original policy was adopted on 29th June 2021.

2.11 REVIEW POLICY

The Board shall review the policy from time to time and any changes including changes in line with the amendments if any in the regulatory provisions shall be made if necessary subject to the recommendations of the CSR Committee.
