



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

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Company Philosophy for CSR policy

ASBI believes that business enterprises are economic organs of the society and to be a truly value adding organization, ASBI should not only deliver quality products but also directly nurture the society and its environment in a scale that is appropriate to its economics. Corporate Social Responsibility (CSR) plays an important role in an organization's existence and in sustainable growth of the Organisation. In line with this belief, ASBI carries out CSR activities to build a better, sustainable way of life for the weaker sections of society. These Programs, projects and activities (collectively known as "CSR Programs") will be independent of the normal business activities of the ASBI.

Policy Objective:

The objective of this Policy is to set a guiding principles for carrying out CSR activities by the Company and also to set up process of execution, implementation and monitoring for the CSR activities to be undertaken by the Company.

Following are the broad CSR Policy objectives:

- Ensure an increased commitment at all levels in the organisation, to operate its business in an economically, socially & environmentally sustainable manner, while recognising the interests of all its stakeholders.
- To directly or indirectly take up programs that benefit the communities in & around the factories of the Company that result, over a period of time, in enhancing the quality of life & economic well-being of the local populace.
- To drive a progressive, responsible business agenda across a range of issues – from keeping our people safe to making sure we adhere to the very highest standards in our manufacturing and product quality.

Quantum of Amount to be spent on CSR Activities

The Company, in every Financial Year, shall endeavor to spend the feasible amount, which shall not be restricted by the statutory limit of a specified percentage of its average net profits immediately preceding three Financial Years. However, the aforementioned expenditure in any Financial Year shall be atleast 2% of Company's average Net profits for the three immediately preceding Financial Years. Such CSR expenditure shall also include all direct and indirect expenditure incurred towards CSR programs as may be admissible under the regulatory framework. The overall amount to be committed towards CSR will be approved by the Board of Directors as a part of its Annual Action Plan. Further, any surplus arising out of CSR Activities shall not form part of the business profit of the Company and same shall be spent for undertaking any CSR activities only.



CSR Committee Composition

Members of the CSR Committee

1. Mr. M. Fujiwara – Director & Chairperson
2. Mr. M. V. Rao – Managing Director

Procedure for CSR Activities

- i. The Committee shall recommend to the Board, the CSR Activities to be undertaken for the financial year along with the detailed plan, modalities of execution, implementation schedule, monitoring process and amount to be incurred on such activities;
- ii. The Board shall give its approval based on the recommendation of the Committee and in compliance of this Policy; or may give enabling authority to the Committee or company officials as the Board may deem appropriate.
- iii. The Committee, after approval, shall maintain the report giving status of the CSR Activities undertaken, Expenditure Incurred and such other details as may be required by the Board.

Role of the CSR Committee:

The mandate of the said CSR committee shall be:

- i) to formulate and recommend to the Board, a Corporate Social Responsibility Policy, which shall indicate the activities to be undertaken by the Company as CSR activity;
- ii) to formulate and recommend an Annual Action Plan in pursuance to its CSR policy and to recommend the amount of expenditure to be incurred on the activities referred to above;
- iii) to monitor the Corporate Social Responsibility Policy of the Company from time to time
- iv) to ensure that the activities as are included in CSR Policy of the Company are undertaken by the Company as per CSR budget.



List of Activities/Projects

The Company shall undertake any of the following Activities/Projects or such other activities / projects as may be notified by the Ministry of Corporate Affairs from time to time as a part of the Corporate Social Responsibility (“CSR”):

- i. Eradicating hunger, poverty and malnutrition, promoting preventive health care and 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 centers 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, agro forestry, conservation of natural resources and maintaining quality of soil, air and water;
- 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 arts and handicrafts;
- vi. Measures for the benefit of armed forces veterans, war widows and their dependents;
- vii. Training to promote rural sports, nationally recognised sports, Paralympic and Olympic sports;
- viii. 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 economically backward classes, minorities and women;
- ix. Contribution to funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- x. Rural development projects;
- xi. 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”)
- xii. Providing seed capital including creating of any corpus fund to help tide over any temporary funding gap. Such corpus fund could be deployed with or without interest depending upon the identified need, to help self-help groups to further the cause sustainable livelihood for the economically weaker sections of society.



The CSR Activities shall be undertaken for the benefit of the public and not only for the employees of the Company and their family. Provided that the preference shall be given to the local areas and areas where the Company operates for undertaking the CSR Activities.

Identification of activities/projects:

Out of approved CSR activities, the Committee shall prioritise the activity/project that should be given priority for the respective financial year. While arriving at the decision of the activity to be undertaken for the respective year, the Committee shall analyse the basic need of the community/ area in which the Organisation operates or at the place where its registered office is situated. The Committee shall record its findings and prioritise the CSR activities accordingly.

Implementation and Monitoring and Guiding Principles:

1. The Company may undertake CSR Activities through a registered trust or society or
2. Through any company, established by the Company, its holding or subsidiary company under Section 8 of the Act for such non-for-profit objectives. Provided that the company can spend the CSR amount through any other institutions having an established track record of 3 years in undertaking similar programs.
3. The Company may collaborate with any other companies for undertaking the CSR Activities subject to fulfillment of separate reporting requirements as prescribed in the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the “Rules”) or in any amendment thereof.
4. The Company may build CSR capabilities of its personnel as well as those of implementing agencies through institutions with established track records of at least three financial years.
5. The CSR Activities shall not include any activity undertaken by the Company in pursuance of normal course of business of the Company. The Company shall not make any payment directly or indirectly to Political Party(ies) for CSR Activities.
6. The CSR activities undertaken by the Company either directly or through an implementing agency shall be periodically monitored. While monitoring, the Company shall ensure that the Implementing Agency or the vendor follow ethical practices and also endeavor to ensure all payments made to the Implementing Agency or the vendor to be milestone based. The Monitoring process adopted by the Company may include obtaining of reports of different kind, self-declaration, On-site visit, etc.



Annual Action Plan:

CSR Committee shall recommend overall CSR Annual Action Plan and upon Boards approval CSR Committee may implement the plan as per guiding principal and policy and may report the Board of Director from time to time.

All the guiding principles as required to be followed for implementing and monitoring the CSR Activities shall also be followed while formulating the Annual Action Plan. The Annual Action plan shall be simple, action oriented, measurable, relevant and time bound.

Limitation and Amendment

The Board of Directors may in their discretion and on recommendation of the CSR committee, make any changes/modifications and/or amendments to this Policy from time to time for making suitable amendments for better implementation of the Policy. In the event of any conflict between the provisions of this Policy and statutory requirements, law shall prevail over and automatically be applicable to this Policy.

Management Commitment:

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

Our Corporate Social Responsibility policy conforms to the relevant section of the Corporate Social Responsibility, Rules made under Companies Act, 2013 and amendment(s) to be made thereto in future.