



## CORPORATE SOCIAL RESPONSIBILITY POLICY

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### **1. INTRODUCTION:**

Gulshan Polyols Limited ("GPL") was incorporated under the Companies Act, 1956 on 20<sup>th</sup> October, 2000.

### **2. SHORT TITLE:**

This policy in relation to the Corporate Social Responsibility ("CSR") of Gulshan Polyols Limited ("GPL") is titled as the "GPL CSR Policy" and shall include any alterations, amendments or modifications hereto from time to time.

### **3. VISION STATEMENT, OBJECTIVE AND APPLICABILITY**

GPL has a vision to "Enhance Stakeholder value while adhering to the code of 'Responsible Care' and ethical values".

To actualize this vision, GPL has set the following mission before itself through innovations, constantly endeavor to bring better products and processes that create greater value for the society and thereby ensuring:-

- Effective contribution to the society
- Value addition to the Stakeholders
- Growth and Development of its employees

This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act, 2013 ("Act") and the rules issued thereunder.

The CSR policy aims to achieve following Objectives:

- a. Enhance the quality of life of the people in areas surrounding the plant and offices;
- b. Create a positive impact by making sustainable developments in the society and promote good environmental practices;
- c. Be responsible and responsive corporate citizen through endeavors to create a safe, harmonious and ecologically balanced environment for its members and the community at large.
- d. Maintain commitment to quality, health and safety in every aspect of the business and people;

Further, GPL endeavors to ensure increased commitment at all levels in the

organization, to operate its business in an economically, socially and environmentally sustainable manner, while recognizing the interest of all its stakeholders.

#### **4. DEFINITIONS:**

Unless the context so requires, the terms used herein shall have meaning assigned herein:

- (i) "Act" means Companies Act, 2013.
- (ii) "Average Net Profit" shall have the same meaning as prescribed in Section 135 of the Act read with the Rules.
- (iii) "Board" shall mean Board of Directors of GPL.
- (iv) "CSR activities" shall mean the projects or programs or activities undertaken / to be undertaken by GPL as prescribed in Schedule-I of this policy.
- (v) "CSR Committee" shall mean a Committee duly constituted by the Board of Directors pursuant to provisions of Section 135 of the Act and the CSR Rules.
- (vi) "CSR Policy" shall mean Corporate Social Responsibility Policy of GPL.
- (vii) "GPL" or "Company" shall mean **GULSHN POLYOLS LIMITED**.
- (viii) "CSR Rules" means Companies (Corporate Social Responsibility Policy) Rules, 2014 as may be amended from time to time.
- (ix) "CSR Expenditure" means the amount recommended by the CSR Committee to be incurred on the CSR Activities in India in terms of the Act and the CSR Rules as approved by the Board from time to time.

Any term not defined above, shall have the meaning assigned to it under the Act, CSR Rules or any other prevailing law.

#### **5. SCOPE:**

The CSR Policy applies to the formulation, execution, monitoring, evaluation, and documentation of CSR activities in the target locations, in and around Company's offices and plants.

#### **6. MEMBERS AND MEETINGS OF CSR COMMITTEE**

The Committee shall meet as often as necessary subject to the minimum number and frequency stipulated by the Board or as prescribed by any law or authority, time to time.

The following are the members of **Corporate Social Responsibility (CSR)** Committee:

<b>Name</b>	<b>Designation</b>
1. Mr. Jeewan Jyoti Bhagat	Chairman
2. Ms. Arushi Jain	Member
3. Ms. Aditi Pasari	Member

## **7. CSR APPROACH AND GUIDING PRINCIPLES**

As a corporate citizen of India, the Company aims to work towards inclusive and sustainable development of the community in and around its areas of operations and other parts of the country. The objective of the CSR projects / programmes of the Company is to improve the quality of life of people and build lasting social capital through interventions in social initiatives for the benefit of the community.

The guiding principles for selection, implementation and monitoring of CSR activities of the Company as well as formulation of the annual action plan shall be as follows:

### **i. Selection of CSR Projects and Programmes**

- a. While CSR projects / programmes of the Company may be carried out in any part of India, the Company shall give preference to the local areas around its manufacturing facilities/units.
- b. The Company shall not discriminate against the beneficiaries of the CSR projects / programmes, on any grounds including caste, creed, gender, race, religion, disability or sexual orientation but it may focus its CSR projects / programmes to benefit the economically or socially weaker or marginalised sections of the society.
- c. The Company may select the CSR projects /programmes based on need assessment, consultation with local bodies / government authorities or any other process as may be deemed appropriate considering the nature of activity including the emergent requirements arising out of natural calamity / disaster, pandemic, etc.
- d. While selecting the CSR projects / programmes having implementation schedule of more than one year or outlay of Rs. one crore or more, the Company shall endeavor to define the following:
  - I. Project / Programme objectives.
  - II. Implementation schedules - Timelines for milestones of the project / programme.
  - III. Major results expected and measurable outcome.
- e. The CSR programmes, projects or activities to be undertaken by the Company shall relate to one or more areas or subjects specified in Schedule VII to the Companies

Act, 2013, as amended from time to time.

- f. The CSR activities to be undertaken by the Company pursuant to this policy are outlined in **Schedule I** attached hereto.

**ii. Implementation of CSR Projects and Programmes**

- a. The time period for implementation of a particular project or programme will depend on its nature, extent of coverage and the intended impact thereof.
- b. GPL will follow a project / programme wise accountability approach to stress on the long term sustainability of its CSR projects / programmes. The CSR projects / programmes will be classified as under:
  - I. Ongoing Project - Multi-year CSR project/programme having timelines not exceeding three years excluding the financial year in which it is commenced and shall include CSR project /programme which was initially not approved as multi-year project/ programme but whose duration has been extended beyond one year by the Board of Directors of the Company based on reasonable justification; and
  - II. Other Projects – CSR projects/programmes which are not Ongoing Projects will be treated as other projects / programmes.
- c. CSR projects/ programmes shall be implemented with participation of local community, wherever possible, and in consultation with local administration at village, block and district levels, wherever applicable. In order to make the desired impact on the society at large, the Company may synergize its CSR projects/ programmes with the initiatives undertaken by the Central / State Government, District Administration and Local Administration, as the case may be.
- d. The CSR projects / programmes shall be executed by the Company itself and/ or through Mridul Literacy Society and / or any other implementing entities which fulfil the criteria and meet the requirements, as prescribed under Rule 4 of CSR Rules.
- e. The target beneficiaries, the local authorities, professionals and institutions etc. involved in similar activities if need, may be consulted/ associated in the process of planning and implementation of the CSR activities.
- f. Agency will hire professionals on need basis wherever considered necessary to plan and implement various projects

**iii. Monitoring of CSR Activities**

- a. The monitoring and reporting mechanism for CSR Projects / Programmes shall be indicated in the annual action plan approved by the Board of Directors of the

Company.

- b. The CSR programmes / projects to be monitored using appropriate monitoring tools that may include field visit(s), self-assessment report(s), feedback survey(s), impact assessment(s) (if applicable), periodical review(s) or any other appropriate mechanism.
- c. The Company shall undertake impact assessment, through an independent agency, of its CSR projects / programmes having outlays of rupees one crore or more, if applicable as per the requirements of CSR Rules.
- d. Corporate Social Responsibility Committee ("CSR Committee") of the Board of Directors shall periodically monitor the progress of the CSR projects / programmes or by the person(s) authorize by the Committee/ Board.
- e. The Board of Directors of the Company shall be periodically apprised about the progress of CSR projects / programmes. In case of Ongoing Project(s), the Board of Directors of the Company shall monitor the implementation thereof with reference to the approved timeline and year-wise allocation.

#### **iv. Formulation of Annual Action Plan**

- a. Depending upon the timeline of implementation of a particular CSR Project / Programme, it shall be identified as an Ongoing Project or Other Project as per the parameters given above.
- b. The CSR annual action plan shall include the following:
  - I. The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Companies Act, 2013;
  - II. the manner of execution of such projects or programmes as specified in sub-rule of rule 4 of CSR Rules;
  - III. the modalities of utilisation of funds and implementation schedules for the projects or programmes;
  - IV. monitoring and reporting mechanism for the projects or programmes; and
  - V. details of need and impact assessment, if any, for the projects undertaken by the Company.
  - VI. The annual action plan would include the budget / outlay approved against the CSR projects / programmes to be undertaken.

### **8. CSR ACTIVITIES SCHEDULE**

- a. The Board shall ensure that the CSR Activities that are undertaken by the Company should be within the scope of the following activities:

- I. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- II. Promoting education, including special education and employment enhancing vocation skills especially among children, woman, 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 centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically back ward 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- 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 windows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- VII. Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
- VIII. Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for social-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- IX. 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 Government, and
- X. 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).

XI. Rural development projects;

XII. Slum area development

Explanation - For the purpose of this item, the item 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under law for the time being in force;

XIII. Disaster management including relief, rehabilitation and reconstruction activities; and

XIV. Any other project as may be specified under Schedule VII of the Companies Act, 2013, from time to time.

- b. The CSR Activities will be carried out in a manner that the preference is to undertake the CSR Activities in and around the local areas where the Company operates. CSR activities may also be taken up in urban, rural and tribal communities, wherein social engagement by GPL is warranted as per needs assessment.
- c. Based on the scope of activities set out in paragraph 8(a) above, the CSR Committee shall provide recommendations to the Board with respect to specific CSR Activities that may be undertaken by the Company.

#### **9. BUDGET / APPROVAL OF CSR PROJECTS / PROGRAMMES FOR CSR ACTIVITIES:**

- a. CSR Committee shall recommend to the Board of Directors of the Company, the expenditure to be incurred on various CSR projects, programmes and activities and the annual action plan for a financial year and in case of an Ongoing Project, the total amount to be spent on the said project / programme over the years.
- b. The Board of Directors shall, after taking into account the recommendations made by the CSR Committee, approve the amount of expenditure to be incurred on CSR projects, programmes and activities and the annual action plan for a financial year and in case of an Ongoing Project, the total expenditure to be incurred on the said project / programme over the years, as it may consider appropriate.
- c. The Board or CSR Committee may delegate/sub delegate requisite powers for execution and implementation of this policy which may include powers for meeting any unforeseen and / or urgent requirements.
- d. The amount of such expenditure shall not be less than 2% of the Average Net Profits of GPL made during the three immediately preceding financial years.
- e. GPL may build CSR capacities of its own personnel as well as those of their implementing agencies but the Board shall ensure that such administrative

overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year

- f. All administrative expenses including expenditure on wages and salaries, tours and travels, training and development of personnel deputed on CSR activities would be included in the amount of expenditure to be incurred on CSR activities.
- g. The expenditure on CSR activities shall include all the expenses incurred by the company for 'general management and administration' of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.
- h. Based on the total approved Budget, Managing Director of GPL would be authorized to allocate funds for different projects on the basis of identified CSR plans on yearly basis, under different budget heads for undertaking CSR activities.

#### **10. REPORTING:**

- a. A yearly report on activities / projects identified / implemented shall be submitted to CSR Committee.
- b. The report of the Board includes the annual report on CSR Activities of the Company and sets out the requisite information in terms of the Act and the Rules.
- c. The contents of the CSR Policy along with composition of the CSR committee, and projects approved by the Board are also made available on the website (if any) of the Company.
- d. In case of failure to ensure the minimum CSR Expenditure, detailed reasons for the same are adequately disclosed in the Board Report

#### **11. GENERAL:**

- a. The surplus arising out of CSR projects or programs shall not form part of the business profits of GPL.
- b. Any amendment or modification to the CSR Policy shall be approved by the Board on the recommendation of CSR Committee.
- c. The contents of the latest and updated version of the CSR Policy is included in the report of the Board.

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**Annual Report on Corporate Social Responsibility (CSR) Activities**

[Pursuant to Section 135 of the Companies Act, 2013 ('the Act') &amp; Rules made thereunder]

Over the past decade, the '**Gulshan**' has focused on several corporate social responsibility programs. The Company continues its endeavor to improve the lives of people and provide opportunities for their holistic development through its different initiatives in the areas of Preventive Healthcare, Promoting Education, Social and Rural development projects etc.

The year 2020 threw up the biggest challenge humanity has faced for a long time, the Covid-19 pandemic. From the very beginning, it was clear to us that our response had to be commensurate with the severity and scale of the crisis. We recognize that the pandemic and its after-effects are going to be with us for some time. Keeping this in mind, we have ensured that a significant part of our support is towards strengthening and augmenting the capacity of the public health system in India, especially in some of the most underserved areas. We would like to highlight the fact that our Covid-19 response and investments were in addition to the regular CSR work, which we continued to support to the fullest extent.

**1. A brief outline on the CSR policy of the Company:**

We have always considered sustainable development the keystone of our business strategy. Our strategy includes nurturing close and continuous interaction with the people and communities around our manufacturing divisions, bringing qualitative changes in their lives and supporting the underprivileged.

Our focus is on the all-round development of the communities around our plants located mostly in distant rural areas with focus on the following:

- a. Enhance the quality of life of the people in areas surrounding the plant and offices;
- b. Create a positive impact by making sustainable developments in the society and promote good environmental practices;
- c. Be responsible and responsive corporate citizen through endeavors to create a safe, harmonious and ecologically balanced environment for its members and the community at large;
- d. Maintain commitment to quality, health and safety in every aspect of the business and people.

In line with CSR Policy and in accordance with Schedule VII to the Companies Act, 2013, the Company has undertaken the following CSR projects:

- a. Promoting Education
- b. Providing Sanitation Facilities
- c. Promoting healthcare including preventive healthcare
- d. Ensuring Environment Sustainability
- e. Rural Development

The Company has undertaken the above CSR activities directly and also through registered trust or registered society having an established track record of more than 3 years in undertaking similar activities.

**2. Composition of CSR Committee:**

S. No.	Name of Director	Designation / Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year
1.	*Mr. Ajay Jain	Ex-Chairman	2	1
	**Mr. Kailash Chandra Gupta	Ex-Chairman	2	1
	***Mr. Jeewan Jyoti Bhagat	Chairman	Not entitled to attend the Meetings during	



		the FY 2020-2021		
2.	Ms. Arushi Jain	Member	2	2
3.	Ms. Aditi Pasari	Member	2	2

\*Mr. Ajay Jain resigned w.e.f August 21, 2020.

\*\* Mr. Kailash Chandra Gupta chaired the CSR Committee w.e.f September 10, 2020 and resigned w.e.f April 2, 2021.

\*\*\*Mr. Jeewan Jyoti Bhagat inducted in the Committee w.e.f May 7, 2021.

**3. Weblink of Composition of CSR committee, CSR Policy and CSR projects as approved by the board and disclosed on the website of the company:**

[http://www.gulshanindia.com/pdf/policy/Corporate%20Social%20Responsibility%20%20\(CSR\)%20Policy.pdf](http://www.gulshanindia.com/pdf/policy/Corporate%20Social%20Responsibility%20%20(CSR)%20Policy.pdf)

**4. Details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014:**

In terms of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, the requirement of conducting an impact assessment of its CSR Projects is not applicable to the Company.

**5. Details of the amount available for set off in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social Responsibility Policy) Rules, 2014 and amount required for set off for the financial year, if any:**

S. No.	Financial Year	Amount available for set-off from preceding financial years (in Rs.)	Amount required to be set-off for the financial year, if any (in Rs.)
<b>Not Applicable</b>			

**6. Average net profit of the company as per section 135(5):** Rs. 2599.35 Lakhs

**7. (a) Two percent of average net profit of the Company as per Section 135(5):** Rs. 51.99 Lakhs

**(b) Surplus arising out of the CSR projects or programmes or activities of the previous financial years:** NIL

**(c) Amount required to be set off for the financial year, if any:** NIL.

**(d) Total CSR obligation for the financial year 2020-21 (7a+7b-7c):** Rs. 51.99 Lakhs

**8. (a) CSR amount spent or unspent for the financial year:**

Total Amount Spent for the Financial Year 2020-21 (Rs. in Lakhs)	Amount Unspent (Rs. in Lakhs)				
	Total Amount transferred to Unspent CSR Account as per section 135(6).		Amount transferred to any fund specified under Schedule VII as per second proviso to section 135(5).		
	Amount	Date of transfer	Name of the Fund	Amount	Date of transfer
218.09*	Not Applicable				

\* Rs. 218.09 is inclusive of Rs. 166.10 Lakhs includes accumulated unspent amount of Rs. 148.15 Lakhs from previous financial years, for which details are given below.

**(b) Details of CSR amount spent against ongoing projects for the financial year:**

1	2	3	4	5	6	7	8	9	10	11
S. No.	Name of the Projec	Item from the list	Loca l area	Location of the project	Project duratio n	Amount allocated	Amoun t spent in the	Amount transferr ed to	Mode of Implement ation-	Mode of Implementati on – Through



S. No.	Title of activities in Schedule VII to the Act	(Yes /No)	Location		for the project (in Rs.)	current financial Year (in Rs.).	Unspent CSR Account for the project as per Section 135(6) (in Rs.).	Direct (Yes /No)	Implementing Agency	
			State	District					Name	CSR Registration number
NIL										

**(c) Details of CSR amount spent against other than ongoing projects for the financial year:**

1 S. No.	2 Name of the Project	3 Item from the list of activities in Schedule VII to the Act	4 Local area (Yes /No)	5 Location of the project		6 Amount spent in FY 2020-21 (Rs. In Lakhs)	7 Mode of Implementation - Direct (Yes /No)	8 Mode of Implementation - Through Implementing Agency	
				State	District			Name	CSR Registration number (Became applicable from April 1, 2021)
1.	Organized Free Eye Checkup and eye surgery Camp	Schedule VII (i)- Promoting Health Care including Preventive Health Care	Yes	Uttar Pradesh	Muzaffarnagar	1.19	Yes	-	
2.	Organized Health Check Up Camp		Yes	Uttar Pradesh	Muzaffarnagar	1.03	Yes	-	
3.	Primary and secondary School development	Schedule VII (ii)- Promoting Education	Yes	Uttar Pradesh	Muzaffarnagar	0.84	Yes	-	
4.	Other Social/Rural Development As per Schedule VII of the Companies Act 2013	Schedule VII (x) & others- Rural Development Projects and others as prescribed in Schedule VII	No	Uttar Pradesh, Gujarat, Madhya Pradesh, Himachal Pradesh, New Delhi	Muzaffarnagar, Bharuch, Ponta, Boregaon, Delhi	50.03	Yes	-	
5.	Construction of School for Vocational Studies for under privileged children	Schedule VII (ii)- Promoting Education	No	Delhi	Delhi	165	No	Mridul Literacy Society	CSR00012733
<b>Total</b>						<b>218.09</b>			

**(d) Amount spent in Administrative Overheads:** Not Applicable**(e) Amount spent on Impact Assessment, if applicable:** Not Applicable**(f) Total amount spent for the Financial Year (8b+8c+8d+8e):** Rs. 218.09 Lakhs**(g) Excess amount for set off, if any:**

S. No.	Particular	Amount (Rs. In Lakhs)
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(i)	Two percent of average net profit of the company as per section 135(5)	51.99
(ii)	Total amount spent for the Financial Year	218.09
(iii)	*Excess amount spent for the financial year [(ii)-(i)]	166.10
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any	0.00
(v)	Amount available for set off in succeeding financial years [(iii)-(iv)-Rs. 148.15 Lakhs]	17.95

- Rs. 166.10 Lakhs includes accumulated unspent amount of Rs. 148.15 Lakhs from previous financial years, for which details are given below.

**9. (a) Details of Unspent CSR amount for the preceding financial years:**

S. No.	Preceding Financial Year	Amount transferred to Unspent CSR Account under section 135 (6) (in Rs.)	Amount spent in the reporting Financial Year (in Lakhs)	Amount transferred to any fund specified under Schedule VII as per section 135(6), if any			Amount remaining to be spent in succeeding financial years (in Rs.)
				Name of the Fund	Amount (in Rs)	Date of transfer	
1.	2016-17	NA	52.65	NA	NA	NA	
2.	2017-18		52.57				
3.	2018-19		26.46				
4.	2019-20		16.47				
<b>TOTAL</b>			<b>148.15</b>				

**(b) Details of CSR amount spent in the financial year for ongoing projects of the preceding financial year(s):**

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
S. No.	Project ID	Name of the Project	Financial Year in which the project was commenced	Project duration	Total amount allocated for the project (in Rs.)	Amount spent on the project in the reporting Financial Year (in Rs)	Cumulative amount spent at the end of reporting Financial Year (in Rs.)	Status of the project - Completed /Ongoing
Not Applicable								



**10. In case of creation or acquisition of capital asset, furnish the details relating to the asset so created or acquired through CSR spent in the financial year (asset-wise details)**

- (a) Date of creation or acquisition of the capital asset(s):** Not Applicable
- (b) Amount of CSR spent for creation or acquisition of capital asset:** NIL
- (c) Details of the entity or public authority or beneficiary under whose name such capital asset is registered, their address etc.:** Not Applicable
- (d) Provide details of the capital asset(s) created or acquired (including complete address and location of the capital asset):** Not Applicable

**11. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5):** Not Applicable

Place: Delhi  
Date: July 21, 2021

**Dr. Chandra Kumar Jain**  
Chairman & Managing Director  
00062221

**Jeewan Jyoti Bhagat**  
Chairman of CSR Committee  
00007743

