

CORPORATE SOCIAL RESPONSIBILITY

(CSR) POLICY

1. SHORT TITLE & APPLICABILITY:

- a. The policy lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community
- b. The objective of this policy is to set 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.

2. CSR VISION STATEMENT

- a. In alignment with vision of the company, Vaswani Industries Limited, through its CSR initiatives, will continue to enhance value creation in the society and in the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth for the society and community, in fulfillment of its role as a Socially Responsible Corporate, with environmental concern.

3. CSR OBJECTIVE

- i. Directly or indirectly take up programs that benefit the communities in & around its work places, over a period of time, in enhancing the quality of life & economic well-being of the local population.
- ii. Generate through CSR initiatives, a community goodwill for Vaswani Industries Limited and help reinforce a positive & socially responsible image of Vaswani Industries Limited as a Corporate entity.
- iii. Ensure an increased commitment at all levels in the organization, to operate its business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders.

4. CSR ACTIVITIES:

The company shall undertake CSR projects or programs which fall within the purview of the activities specified in schedule VII of the Companies Act, 2013. In pursuit of the above our company identified the following focus areas:

- Village women empowerment
- Contribution to education
- Medical and health
- Organize workshops and training for sports aspirants

5. AMOUNT TO BE ALLOCATED:

- a. Vaswani Industries Limited will allocate 2% of the average of its previous three year's Net Profit or such higher amount as the Board may approve from time to time, as its Annual CSR Budget in each

Financial Year for the CSR Activities. The Average Net Profit shall be calculated in accordance with the provisions of Section 198 of the Companies Act, 2013.

b. 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 above mentioned CSR activities only.

6. IMPLEMENTATION PROCESS:

a. CSR programs will be undertaken by the Company to the best possible extent within the defined ambit of the CSR Activities.

b. The time period/duration over which a particular program will be spread, will depend on its nature, extent of coverage and the intended impact of the program.

c. Initiatives of State Government, District Administration, Local Administration as well as Central Government Departments/Agencies, Self-helping groups, etc., would be synergized with the initiatives taken by the Company.

d. Thrust should be given, wherever possible, to the areas related to the business of the Company as a natural corollary to the business.

e. Investments in CSR should be Project based. Mere donations to philanthropic/ charity, contribution of any amount directly or indirectly to any political party or other organizations would not come under the category of CSR Activities.

f. CSR activities should generate community goodwill, create social impact and visibility.

g. For CSR projects, the time-frame and periodic milestones should be finalized at the outset.

7. MONITORING AND FEEDBACK:

The Contents of this policy shall be disclosed in the Board report and placed on the Company's website. Compliance will be reported to stakeholders through the Company's Annual Report. The Board shall ensure spending of allocated amount on CSR activities and report the status in its annual report, also specify the reasons of not spending of the allocated amount, if any.

8. GENERAL:

Any or all provisions of the CSR policy would be subject to revision/ amendment in accordance with the statutory provisions on the subject as may be stipulated by the Government, from time to time.

Notes: 1. This Policy was originally adopted by the Board of Directors of the Company 19.05.2021 and came into force from 19.05.2021.