INDIAN TONERS & DEVELOPERS LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

(To comply with the Provisions of Section 135 of the Companies Act, 2013 and the rules framed thereunder and incorporating MCA circulars upto 18.06.2014)

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CSR - Purpose

Corporate Social Responsibility (CSR) is a concept which integrates the company's business objectives with social and environmental concerns while interacting with their stakeholders.

CSR – Objectives

- > To lay down guiding principles to ensure strong corporate culture which emphasizes on integrating CSR values with Business Objectives.
- To do business by adding value to the community and society on a sustainable basis through dedicated policies, institutional setup and engagement process to promote inclusive growth.
- To practice the Company's corporate values through its commitment to grow in a socially and environmentally responsible manner.

CSR - Annual budget

The Company shall allocate for each financial year, a budget of 2% of its average net profits made during the last three financial years.

Any surplus arising out of the contribution made for CSR Activities shall not form part of the business profit of the Company and shall be redeployed for such activities.

CSR - Area of work

The Company shall give preference to the local area and areas around it where it operates.

CSR- Activities

The Company may undertake one or more of the following activities:

- i. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available drinking water;
- ii. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently able and livelihood enhancement;
- 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 building 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 recognized sports, Paralympics sports and Olympic sports;
- viii. Contribution to the Prime Ministers 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;
 - ix. Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
 - x. Rural development projects;
 - xi. Any other activities which may be permitted or allowed within the frame work of law from time to time.

The following activity shall not form part of the CSR activities of the Company:-

- i. The activities undertaken in pursuance of normal course of business of the Company.
- ii. CSR projects/programs or activities that benefit only the employees of the Company and their families.

iii. Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.

CSR – Committee

CSR Committee shall be formed as per the applicable laws and the committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy. The CSR Committee shall submit periodical reports to the Board of Directors.

CSR – Implementation

Project / programs covered under CSR activities shall be implemented:

- i. Directly by the Company.
- ii. In collaboration with other Companies undertaking projects/programs in CSR activities. The CSR committees of respective companies should be in a position to evaluate and report the progress of such projects/programs.
- iii. Any other institutes, NGOs, Government, Semi-government, autonomous bodies, trusts etc. However, any such projects/ program to be undertaken through this entities shall have an established track record of 3 years of undertaking such projects/programs.
- iv. The time period/duration of each project/programs shall depend on its nature, extend of coverage and intended impact of such activity.

CSR - Monitoring

The CSR Committee shall be responsible for monitoring CSR Activities and shall report to the Board from time to time in this regard.

The CSR Committee shall have the powers to:

- i. Seek monitoring and implementation report from the Organisation/s receiving funds.
- ii. Delegate a designated Company official/s to co-ordinate with the Organisation receiving funds to inspect the activities undertaken and ensure information in a timely manner.

Approval Process

The following processes shall be followed:

- The activities and budgets for CSR shall be presented in detail to the Committee for its approval.
- Additionally, the Committee may empower the CMD or such other officer to spend such amount as they think appropriate for some other strategic CSR contingencies that may arise during any financial year.
- The amount spent as above shall be put up for ratification of the Committee at its next meeting and shall be reported to the Board accordingly.

Continuous Monitoring Mechanism

- i. The Committee Members will receive in a prescribed format, a quarterly report on CSR spending;
- ii. A presentation on the progress of the CSR projects / activities will be made to the Committee by the concerned persons at the Committee meetings held from time to time;
- iii. An annual presentation will be made to the Committee which will also include the details of the projects / activities planned for the next year and the respective budgets;
- iv. The Board of Directors of the Company shall review the implementation of CSR Policy from time to time.

CSR - Reporting

The Annual Report of the Company shall include a report on CSR, containing particulars as specified in the Companies (Corporate Social Responsibility Policy) Rules, 2014.

The Board shall also report the reasons for not spending the amount in case the Company fails to spend the amount allocated for CSR activities.

CSR - Activities on Website

The contents of this policy shall be displayed on the website of the Company.