



CAPITAL FOODS PRIVATE LIMITED – CORPORATE SOCIAL RESPONSIBILITY POLICY

1. SHORT TITLE AND APPLICABILITY

- 1.1 This policy, delineates the philosophy of Capital Foods Pvt Limited (**the “Company” or “Capital Foods”**) as a responsible corporate citizen and intends to provide guidelines for undertaking socially impactful programmes for welfare and sustainable development of the community at large, is titled as the **‘CSR Policy’**.
- 1.2 This policy shall govern corporate social responsibility (“**CSR**”) activities to be undertaken by the Company.
- 1.3 This CSR Policy shall operate as the corporate social responsibility policy of the Company for the purposes of Section 135 of the Companies Act, 2013 and the rules made thereunder.

2. OBJECTIVES

CSR Policy intends to:

- 2.1 Strive for socio-economic progress to materially and positively impacts the society at large with minimal impact on environment.
- 2.2 In alignment with vision of the Company, the Company, through its CSR initiatives, to continue to enhance value creation in the society and in the community in which it operates, through its services, conduct and initiatives, so as to promote sustained growth for the society and community, in fulfilment of its role as a socially responsible corporate.
- 2.3 To create, through its CSR initiatives, a community goodwill for the Company and help reinforce a positive and socially responsible image of the Company as a corporate entity.

3. FOCUS AREAS

In accordance with the requirements under the Companies Act, 2013, Capital Foods shall carry out following activities:

- **HUNGER, POVERTY, MALNUTRITION AND HEALTH:** Eradicating hunger, poverty and malnutrition, promoting health care 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.
- **EDUCATION:** promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- **RURAL DEVELOPMENT PROJECTS:** Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.



- **GENDER EQUALITY AND EMPOWERMENT OF WOMEN:** 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 backward groups.
- **ENVIRONMENTAL SUSTAINABILITY:** 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.
- **NATIONAL HERITAGE, ART AND CULTURE:** 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 art and handicrafts;
- **MEASURES FOR BENEFITS OF ARMED FORCES:** Company to contribute in various measures for the benefit of armed forces veterans, war widows and their dependents;
- **PROMOTION OF SPORTS :** to train to promote rural sports, nationally recognised sports, Para-lympic sports and Olympic sports;
- **DISASTER MANAGEMENT:** disaster management, including relief, rehabilitation and reconstruction activities;
- **CONTRIBUTION TO FUNDS:** contribution to the prime minister's national relief fund or any other funds permitted under the Companies Act, 2013 any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- To pursue any other activities permitted under Schedule VII of Companies Act, 2013 as amended from time to time.

4. CSR Implementation

In accordance with sub-section (1) of section 135 of the Companies Act 2013, Company has set up a CSR committee to advise on the company's CSR policy, and monitor the CSR activities of Capital Foods Pvt Limited. All projects are identified as per needs of community. The CSR committee will decide on the locations for CSR activities and may prepare annual plan for CSR activities. This policy shall forthwith be effective.

CSR initiatives will be implemented either directly by the Company or through implementing partners which includes companies established under section 8, of the Act, or its registered public trust or registered society having established track record of at least 3 years in undertaking similar activities. 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 1st April 2021.

The Company may engage international organization for designing, monitoring and



evaluation of CSR Projects, as well as capacity building of their personnel.

Company may carry out impact assessment of the CSR spend from time to time as in terms of Companies Act, 2013.

5. CSR Resource contribution

Minimum 2% of the average of net profit made by the Company during immediately preceding three financial years as per Companies Act 2013.

The Company may spend up to 5% of the total CSR expenditure in one financial year on administrative expenses relating to the general management and administration of CSR functions in the company.

Any unspent amount, other than unspent amount relating to an ongoing project, will be transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Further, unspent CSR funds of ongoing projects will be transferred within a period of 30 days from the end of the financial year to a special account opened by the company in any scheduled bank called the "Unspent Corporate Social Responsibility Account". Such amount shall be spent by the company towards CSR within a period of 3 financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of 30 days from the date of completion of the third financial year.

6. GENERAL

- 6.1. In case of any doubt with regard to any provision of this CSR Policy and also in respect of matters not covered herein, a reference should be made to the CSR Committee. In all such matters, the interpretation and decision of the CSR Committee shall be final.
- 6.2. All provisions of the CSR Policy would be subject to revision/amendment in accordance with the applicable laws.
- 6.3. The Company reserves the right to modify, cancel, add, or amend this CSR Policy.