



**Nikhil Adhesives Limited**

### **Objectives of the CSR Policy:**

The objective of the CSR Policy ("Policy") is to lay down the guiding principles in undertaking various programs and projects by or on behalf of the company in accordance with the Corporate Social Responsibility ("CSR") within the meaning of section 135 of the Companies Act, 2013 read with Schedule VII of the Act and the Companies (Corporate Social Responsibility Policy) Rules 2014 (Rules").

### **CSR Committee:**

The Board level Corporate Social Responsibility Committee of the company shall be responsible to;

- a) formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the *company in areas* or subject, specified in Schedule VII;
- b) recommend the amount of expenditure to be incurred on the activities referred to in clause (a); and;
- c) monitor the Corporate Social Responsibility Policy of the company from time to time.

The members of the Board level CSR Committee are as follows:

Mr. Rajendra Sanghavi- Chairman  
Mr. Umesh Sanghavi- Member  
Mr. Tarak Sanghavi - Member  
Mr. Madhusudan Vora- Member

### **Execution of program and projects:**

At the beginning of each financial year, the CSR Committee of the Board will prepare a list of CSR Projects/ Activities/ Programmes which the company proposes to undertake during the financial year, specifying the modalities of execution in the areas/sectors chosen with implementation schedules for approval of the Board. The Company may take up other activities/Projects/Programs as it may consider appropriate.

### **Monitoring of CSR Activities:**

CSR committee of the company will be responsible for the monitoring of various CSR projects or programs undertaken by the company directly or indirectly. The committee shall ensure that:

- company undertakes the CSR activities as provided in the CSR policy;
- The project programs are implemented as per the program approved by the board;
- The budget allocated for each of the project is utilized for the projects as per the approved plans;
- The objective of the project program is achieved as per the plans;
- Wherever project/programs are undertaken in partnership with one or more organizations, the part of the project or program undertaken by the company shall be distinguishable and necessary supporting documents in respect of the same shall be obtained from the other partners/implementing agency on an annual basis.
- company shall provide necessary resources and human capital for implementation and the effective monitoring of the CSR projects and programs as may be directed by the CSR committee. The services of any external agencies or persons who have experience in the same or similar projects or programs undertaken or proposed to be undertaken by the company may also be made available for successful implementation and monitoring of the project.

**Surplus arising out of CSR:**

Surplus arising out of any CSR project or program or activities shall not form part of the business profit of the company.

**Exclusions:**

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

- The CSR projects and programs that are implemented by the Company for benefit of the employees of the company and their families.
- The CSR activities undertaken/implemented outside India.
- Any amount directly or indirectly contributed towards any political party under Section 182 of the Act.
- Activities that are undertaken by the company in pursuance of its normal course of business.
- Surplus arising from CSR activities shall not form part of the business profit of the company.

**Amendment of the Policy:**

The CSR policy of the company may be amended at any time by the board of the Company on the recommendation of the CSR committee.

**Reporting:**

The Board's Report of a company shall include content of CSR policy and the same shall be displayed on the website of the company.

**CSR Thrust Area:**

The company may continue to undertake/fund project, programs or activities of the following nature and also undertake such other activities as may be approved by the board as is falling under schedule VII of the Act 2013. The Following are the activities falling under schedule VII of the Act 2013:

- 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.
- promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- 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.
- 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.
- 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 the benefit of armed forces veterans, war widows and their dependents.

- training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports.
- contribution to the prime minister's national relief fund or 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.
- Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- rural development projects
- slum area development.

**Review of Policy:**

The Company will review the areas from time to time and make additions/deletions/clarifications to the above areas.

**Disclosures:**

The Annual Report of the company include a section on CSR outlining the CSR Policy, CSR committee, CSR initiatives undertaken by the company, the CSR spend during the financial year and other information as required by the prevailing law.