
CORPORATE SOCIAL RESPONSIBILITY POLICY
OF
JUPITER LAMINATORS PRIVATE LIMITED

Corporate Social Responsibility (CSR) is about how Companies directs the business processes to produce an overall positive impact on the society. It is the continuing commitment by a business to behave ethically and contribute to economic development while improving the quality of life of people at large. We, in JLPL, believe in integrating the social, environmental, and economic concerns of society in the culture, values and corporate goals of the Company. In its endeavor to give the best to society, JLPL seeks to carry out such activities that create long-term positive effects on the people and society at large. Corporate Social Responsibility is about capacity building for sustainable livelihoods. It is about how an organization's existence affects stakeholders beyond its own insular interests and recognizing the impact of its operations on the community. CSR determines how we can use this impact in a positive way, leading to sustainable growth and financial gains.

Jupiter Laminators Private Limited in India is committed to undertake CSR activities in accordance with the provisions of Section 135 of the Companies Act, 2013 ("the Act") and the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("CSR Rules") as amended from time to time.

1. Objectives of the Policy

The objectives of this policy are:

- (a) To set forth the company's Corporate Social Responsibility Policy as stipulated in the Section 135 of the Companies Act, 2013 and the rules thereof.
- (b) To identify and formulate the broad areas the company shall pursue towards fulfilling its CSR Obligations.
- (c) To serve as a guiding document to plan, identify, implement and monitor CSR initiatives for JLPL.

2. Thrust areas of CSR

The company has adopted a structured approach to manage its CSR obligations. The company's CSR will be aligned to Schedule VII of the Companies Act 2013 with a focus on education, environment, health and sanitation, sports, art and culture, disaster relief and rural development.

- **Education:** JLPL seeks to promote education and vocational training through its CSR projects. Several challenges remain in delivery of education and access to employment opportunities. In order to bring about development, enabling access to education for the underprivileged sections of the society and enhancing employability of under-served remains a prime area of the company's CSR focus.

- **Environment:** The Company's ethos places special emphasis on issues of environmental conservation and consciousness. Its efforts include establishing its ecological footprint, creating awareness and promoting ecological activities. Jupiter Laminators Private Limited endorses such initiatives by UN's Sustainable Development Goals(SDG) in recognizing environmental, social and economic impact of trees.

- **Health and sanitation:** While access to healthcare and sanitation remains an important indicator of development, lack of access to proper medical facilities plagues many parts of rural and urban India. JLPL seeks to promote healthcare through its CSR projects by organizing various medical camps. The Company focuses that the benefits arising out of the support for CSR activities accrue to the most need needy sections of the society.
- **Rural Development:** Majority of India's population lives in rural areas and still remains untouched from the recent development and economic progress in India. The company aims to promote and support projects focusing on improving the lives of people in the rural areas.
- **Disaster Relief:** Disaster relief is the monies or services made available to individuals and communities that have experienced losses due to disasters such as floods, hurricanes, earthquakes, drought, tornadoes, and riots. A disaster may also be defined in sociological terms as a major disruption of the social pattern of individuals and groups.
- **Support to Old Age:** At present 95 million people in India are above the age of 60, by the year 2025 nearly 80 million more will be added to this population bracket. With improved life expectancy rate in our country, it's estimated that as many as 8 million people are currently above the age of 80 years. Changing family value system, economic compulsions of the children, neglect and abuse has caused elders to fall through the net of family care. Homes for the Aged are for elderly people who are alone, face health problems, depression and loneliness.
- **Animal Hunger and Feeding:** India has widespread malnutrition of Animals and feeding them is necessary for basic nutrition. To this end JLPL strives to align its CSR activities to provide support to Animals through donations to Goushala and the like.
- **Woman Empowerment:** Woman Empowerment has never been a word but something that we truly believe in and want to promote with our CSR initiative. We at Jupiter Laminators Private Limited distribute several sewing machines to women.
- **Sports:** Sports programs and initiatives have the potential to address key socio-economic needs and build healthier, fitter, more inclusive, and empowered societies. JLPL by its CSR initiatives contribute in promoting sports and cultural activities for participation in state and national level sports.
- **Others:** Any other project as may be permitted under Schedule VII of Companies Act, 2013 as may be notified by Central Government from time to time and as recommended by the Board.

3. **Exclusions**

Corporate Social Responsibility (CSR) means the activities undertaken by the Company in pursuance of its statutory obligation laid down in Section 135 of the Act in accordance with the provisions contained in the CSR Rules, but shall not include the following, namely: -

- (i) activities undertaken in pursuance of normal course of business of the Company.

- (ii) any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level.
- (iii) contribution of any amount directly or indirectly to any political party.
- (iv) activities benefitting employees of the Company.
- (v) activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services.
- (vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India.

4. Governance Structure

The company has constituted a robust and transparent governance structure to oversee the implementation of the CSR Policy. The structure and responsibilities have been described below.

Responsibilities of the Board

- Formulate JLPL's CSR Policy, which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Companies Act 2013, and the notifications thereof.
- Approve the CSR expenditure; entitled to approve higher amount than that specified in the Companies Act 2013 based on financial and other considerations.
- Provide strategic direction to CSR initiatives in alignment with the Policy.
- Institute a transparent monitoring mechanism for implementation of CSR projects.
- Monitor the CSR Policy of the company from time to time.
- Meet at a periodicity it deems fit to review the progress.

5. CSR Budget

The budget for CSR projects shall be approved by the Board of JLPL as per the requirements laid out in the Section 135 of the Companies Act 2013. The total budget proposed for the CSR projects covered under this policy shall be 2% of the average net profits of JLPL made during the three immediately preceding financial years; where the 'net profit' is calculated as mentioned in Section 135 of the Companies Act 2013 for CSR Spend. The Board is entitled to recommend a higher amount than that specified in the Companies Act 2013 based on financial and other considerations.

6. **CSR Projects**

A. **CSR Project Lifecycle**

CSR projects are strategically planned and managed at JLPL. Following are the different stages of the project:

a. **Project identification**

The projects will be prioritized and suggested based on suitable qualifiers by the working team and presented to the Board for approval. The projects must be aligned to at least one of the thrust areas of CSR. Additionally, for those projects classified as CSR, the projects must conform to the requirements of the Section 135 of the Companies Act, 2013. The projects that are located in proximity to the areas where the company operates and where there is a greater scope for employee volunteering would be accorded preference for approval.

b. **Budget of the project**

The Board is responsible for evaluating the budgetary requirements of the project.

c. **Implementation**

The Board in consultation with the Working Team shall formulate a plan of action for the approved projects that specify details of the project including activities to be undertaken, period of implementation, budget plan, project governance and expected results.

The Board shall ensure that the CSR activities are undertaken by the Company itself or through –

(a) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961, established by the company, either singly or along with any other company, or

(b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or

(c) any entity established under an Act of Parliament or a State legislature; or

(d) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Every entity who intends to undertake any CSR activity, shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar

d. **Monitoring**

The Board along with the working team of a specific project and program managers/ owners will be responsible for monitoring of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports.

To ensure the transparency and efficiency of the implementation process, mechanisms to track data and monitor projects will be established. These projects will be evaluated against the milestones defined as per the plan of action and reviewed by the Board on a quarterly basis.

e. Reporting

The Board will annually publish report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act, 2013.

B. Partner Qualifications

Where CSR programs are awarded to implementation agencies, the company will ensure that they are a Registered Trust, Society or a Section 8 Company. The company will conduct due diligence on potential partner agencies to ensure that they have clearly explained mission and vision, do not have a conflict of interest in working with JLPL, have appropriate documentation such as audit reports, annual reports, registration forms as per 80G/12A.

Every entity who intends to undertake any CSR activity, shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar and must have a unique CSR registration number.

The company will also consider reputation risks in selecting a partner agency.

C. Funding & Allocation

For achieving its CSR objectives through implementation of meaningful & sustainable CSR programmes, the Company will allocate 2% of its average net profits made during the 3 immediately preceding financial years as its Annual CSR Budget. The Annual CSR Budget shall be spent on projects / activities as laid down in this Policy.

"Administrative Overheads" expenses incurred by the Company will be used for 'General Management & Administration' of the 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.

Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR Policy and Annual Action Plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Transfer of unspent CSR amount. - Until a separate fund is specified by the Government, the unspent CSR amount, if any, shall be transferred by the Company to a fund specified in Schedule VII of the Act.

7. Capital Asset

The CSR amount may be spent by the Company for creation or acquisition of a capital asset, which shall be held by –

- a. A company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number.
- b. Beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or a public authority

8. Notification

The CSR Policy shall be displayed on the website of the Company, on approval of the Board. The policy will be displayed permanently on the company's intranet enabling every employee to access, be aware and contribute to the policy and drive actions going forward. The new employees shall be informed about the policy by the HR department at the time of on boarding.

9. Amendments to the Policy

This policy will be reviewed annually to check the effectiveness and impact of the policy. The Board has the right to amend or modify this policy in whole or in part, at any time, as deemed necessary. Any amendments or modifications will be suitably notified to all stakeholders.

For JUPITER LAMINATORS PRIVATE LIMITED

Sandeep Bajaj

Anoop Choudhary

Sd/-

Sd/-

Director

Director