

CSR Vision and Policy Document

SUNPLAST ELECTRONICS PRIVATE LIMITED

ABSTRACT

The document outlines the Vision and Policy of Sunplast Electronics Private Limited towards Corporate Social Responsibility, in accordance with Section 135 of the Companies Act 2013 and the Rules thereunder.

Contents

1. Introduction and Background	3
2. CSR Vision and Objective	3
3. Awards and Certifications	4
4. Objectives of the Policy.....	4
5. Focus Areas	5
6. Governance Structure	6
7. Board of Directors of the Company	7
8. Management Team.....	7
9. Members.....	8
10. Responsibilities.....	8
11. CSR Team.....	8
12. Responsibilities.....	8
13. CSR Budget	9
14. Treatment of Surpluses.....	9
15. Treatment of Underspends.....	9
16. Project Life-cycle	9
17. Guiding Principles.....	9
18. Annual Operating Plan	10
19. Project Approval.....	10
20. Implementation	10
<u>21. Monitoring</u>	<u>11</u>
22. Reporting.....	11
23. Partner Qualifications	12
24. Projects / Partners	12
25. Amendments to the Policy.....	12

1. Introduction and Background

Sunplast Electronics Private Limited (SEPL) envisions to become the most preferred one stop solution in the field of plastics and provide customers with world class quality products at reasonable costs and on time deliveries. At SEPL we aim to become a leading solution provider by building a brand which ensures customer satisfaction, involves employees as partners in growth and contribute to the wellbeing of the society.

SEPL has been a socially responsible company since inception and has consistently been investing in programmes which aim to break the vicious cycle of poverty, social isolation and restore hope for a better future. At SEPL we believe that every person has the right to access resources and opportunities in order to live and develop with dignity and to become an active and contributing member of society.

2. CSR Vision and Objective

The CSR vision of SEPL is “*Empowerment of the masses.*”

This policy encompasses our philosophy for giving back to society as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for the welfare and sustainable development of the community at large.

For SEPL, Corporate Social Responsibility means responsible business practices through the involvement of all stakeholders in the decision making process and in operations. It entails having business policies that are ethical, equitable, environmentally conscious, gender sensitive, and sensitive towards the differently abled.

3. Awards and Certifications

Best Infrastructure Improvement Award Year 2013.

Best Infrastructure Improvement Award Year 2015.

Best Infrastructure Improvement Award Year 2016.

Quality Management System ISO 9001:2015

Environmental Management System –ISO 14001:2015

International Automotive Task Force –IATF 16949:2016

4. Objectives of the Policy

The objectives of this policy are to –

- a. To work for the social development of underprivileged individuals, groups and communities;
- b. To encourage healthcare development and health promotion;
- c. To assist in the process of social integration and personal realisation of underprivileged children, young people, adults and families;
- d. To endorse the human rights and in particular the rights of the children and young people as well as the rights of underprivileged groups and communities;
- e. To encourage and popularise voluntary work;
- f. To demonstrate commitment to the common good through responsible business practices and good governance;
- g. To actively support and be part of the state's development agenda to ensure sustainable change;
- h. To set high standards of quality in the delivery of services in the social sector by creating robust processes and replicable models;
- i. To create a sense of empathy and equity among employees of SEPL and to motivate them to give back to the society.

- j. To lay down guidelines to make CSR a key business process for sustainable development of the society thereby ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.
- k. To directly/indirectly undertake projects/programs which will enhance the quality of life and economic well-being of the communities in and around the country and of the society at large.
- l. Establish a guideline for compliance with the provisions of Regulations to dedicate a percentage of SEPL's profits for social projects.
- m. To generate goodwill and recognition among all stakeholders of the company.

5. Focus Areas

SEPL will implement its CSR activities in accordance with Section 135 of the Companies Act 2013 and the Rules notified thereafter in following area:-

- a. Clean and maintain cleanliness in Vrindavan.
- b. Engage volunteers and spread awareness among the masses regarding need to maintain cleanliness and the need to protect and preserve monuments.
- c. Construct Biodiversity Parks in Vrindavan which will serve as a place for conservation of sacred and native trees and shrubs, recreation and mediation.
- d. To spread awareness in society about need to protect and preserve the environment.
- e. To serve freshly prepared nutritious, hygienic and delicious meals to the underprivileged and the needy including the labourers and those who have lost their job due to Covid 19 Pandemic.
- f. To set up kitchen on wheel aimed at serving freshly prepared nutritious food to the vagabonds.

- g. To establish shelter homes and provide safe and comfortable place for stay to those dwelling on roads.
- h. To serve establish, run and maintain goshalas in order to create awareness among general public about the benefits and need to protect cows.
- i. To spread awareness and take steps to protect drastically declining indigenous cattle breed of India.
- j. Spend for welfare of visually impaired through Janta Adarsh Andh Vidyalaya.
- k. Feed patient and their attendants in various hospitals.
- l. To provide food and shelter to poor and downtrodden in the society.

CSR activities shall be undertaken as projects, programs of activities (either new or ongoing) excluding activities undertaken in pursuance of the normal course of business of the Company.

6. Governance Structure

We have constituted a robust and transparent governance structure to oversee the implementation of our CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013 and subsequent amendments made thereto.



7. Board of Directors of the Company

The Board Director of the Company will be responsible for:

- a. Formulating the CSR policy in compliance to Section 135 of the Companies Act 2013
- b. Identifying activities to be undertaken as per Schedule VII of the Companies Act 2013.
- c. Recommending the CSR expenditure to be incurred.
- d. Recommending, modifications to the CSR policy as and when required.
- e. Regularly monitoring the implementation of the CSR policy

8. Management Team

The Management team is responsible for ensuring the smooth execution of all the CSR projects within the company. The team will report to the Board of Directors of the Company

9. Members

The members will include heads of individual departments.

10. Responsibilities

- a) Responsible for the execution of the decisions taken by the Board of Directors
- b) Ensure on-ground implementation of projects.
- c) Send periodic reports to the Board of Directors
- d) Meet as and when required to review the progress
- e) Chief Financial Officer / Finance head / Accounts head will review CSR expenditure and certify that funds disbursed have been utilised for the purposes and in the manner agreed upon by the Board of directors

11. CSR Team

The CSR Team will be responsible for on-ground implementation of the projects.

12. Responsibilities

- a) Evaluate projects as per the CSR Policy.
- b) Identify CSR implementation partners as per Ministry of Corporate Affairs (MCA) guidelines and with requisite registration with MCA.
- c) Implement projects based on set targets and action plans.
- d) Regularly monitor the activities.
- e) Send quarterly reports to the Management Team and Board of Director of SEPL.
- f) Evaluate possible collaborations with other organizations on CSR projects

13. CSR Budget

The total budget for the CSR projects will be calculated on the basis of 2% of average 3 years' net profit before tax. The Annual Operating Plans will be put in place by the Management team in accordance with the CSR goals and priorities identified for each of the key focus areas by the Board of directors. Further the board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.

14. Treatment of Surpluses

Any surplus generated from CSR projects undertaken by us will be tracked and channelized into our CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.

15. Treatment of Underspends

Any underspend in an ongoing programme or project as of 31st March of any given year would be moved to the Unspent Funds (Current) Account and would need to be spent within a period of three years. In case the funds do not get spent within a period of three years, they would need to be transferred by the company to any fund included in schedule VII of the Act.

16. Project Life-cycle

At SEPL, CSR projects are strategically planned and managed. Following are the key stages of a project:

17. Guiding Principles

- a) All CSR programmes and projects must be aligned to thrust areas listed in this Policy document and listed in Schedule VII of the Companies Act, 2013.

- b) CSR projects or programmes must be undertaken in India alone.
- c) CSR activities must not include the activities undertaken in pursuance of normal course of business of the Company.
- d) Projects or programmes or activities that benefit the employees of the Company and their families shall not be considered as CSR.
- e) One-off events such as marathons/ awards/ charitable contribution/ advertisements/ sponsorship of TV programmes etc. will not qualify as part of CSR expenditure.
- f) Contribution of any amount directly or indirectly to any political party shall not be considered as CSR.

18. Annual Operating Plan

The Management team will prepare the Annual Operating Plan for CSR in accordance to the thematic areas approved by the Board and in line with the available CSR budget for the year. The detailed partner wise budget and goals shall be approved by the Managing team and then presented to the Board of Director of SEPL for approval.

19. Project Approval

The projects suggested by the Management Team in consultation with the Board of director will be presented for the approval of the Board of Director.

20. Implementation

The final projects approved by the Board of Director will implemented in a time-bound and impact oriented manner. These projects will either be self-implemented, in partnership with an Implementing Agency or in collaboration with another corporates. CSR activities are undertaken by the company may be implemented by 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 (43 of 1961), established by the company, either singly or along with any other company.
- 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.

All CSR implementation partner must be registered with the Central Government by filing the form CSR- 1 electronically with the Registrar, with effect from the 01st day of April 2021.

21. Monitoring

The CSR team will be responsible for monitoring approved projects, by methods which may include site visits, review meetings, progress reports, etc. Online portals have been developed to track data and monitor projects thereby ensuring transparency and efficiency in the implementation process. Projects will be evaluated against the goals and milestones defined for the project, together with the Implementing Agency (if any). The reports will be submitted to the Management Team for the quarterly review meetings.

22. Reporting

The Board of director based on reports presented by the Management Team, will annually publish a report on the CSR projects as a part of the Director's report of

the Integrated and Annual Report of SEPL. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act, 2013.

23. Partner Qualifications

If a third party is employed to carry out the implementation of our CSR projects, the Board of SEPL will ensure that they have a clearly explained mission/vision and an established track record of three years in undertaking similar projects or programmes in line with the guidelines set by MCA. The implementation agencies should be able to produce their latest audited annual reports and in case of an NGO, they should also be able to produce their registration forms according to 80G/12A. In addition, they would need to be registered with the MCA as of 1st April 2021.

24. Projects / Partners

Board of Directors of the Company will identify suitable projects for implementation in line with the objects of the Company and requirements laid down under the Act. These projects would be executed either directly by the Company and/or through CSR Partner(s) as permitted under the Companies Act, 2013.

25. Amendments to the Policy

The Board of Directors can amend this Policy, as and when required as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Act on the subject as may be issued from relevant statutory authorities, from time to time.