

CSR Policy of "DE HEUS INDIA PRIVATE LIMITED"

1. Preface

Corporate Social Responsibility (CSR) is the way and mean through which corporates can fulfil their obligations towards the society. Corporate Social Responsibility is strongly connected with the principles of sustainability.

CSR is not a charity or mere donation; it is ethical behaviour of a Company towards society at large. Organization should make decisions based not only on financial or operational factors, but also on the social and environmental consequences. Therefore, it is the core corporate responsibility of **De Heus India Private Limited** ("the Company") to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

2. Objectives of the Policy

The key objectives of this CSR Policy are:

- To lay down guidelines for undertaking CSR activities by the Company
- To identify and define focus areas in line with Schedule VII of the Companies Act, 2013
- To establish a transparent governance mechanism for CSR implementation
- To ensure compliance with Section 135 of the Companies Act, 2013 and CSR Rules
- To provide a framework for planning, execution, monitoring and reporting of CSR activities

3. Vision & Mission

Vision

To contribute towards building a healthier, inclusive, and environmentally sustainable society.

Mission

- To act as a socially responsible corporate citizen
- To promote healthcare accessibility for underserved communities
- To support education and skill development initiatives
- To contribute towards environmental sustainability and climate action
- To preserve and promote cultural heritage and community well-being

4. Applicability

This Policy is framed in accordance with:

- Section 135 of the Companies Act, 2013
- Companies (CSR Policy) Rules, 2014

The provisions of CSR are applicable to the Company based on the prescribed thresholds.

This Policy shall be effective from the date approved by the Board of Directors.

5. Scope of CSR Activities

The CSR activities of the Company shall:

- Be in line with Schedule VII of the Companies Act, 2013
 - Be undertaken within India
 - Exclude activities undertaken in the normal course of business
 - Focus on sustainable and measurable impact
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6. Areas to Emphasize

The Company may spend the CSR amount in any of the activities mentioned in Schedule VII of the Companies Act 2013:

- (i) Eradicating hunger, poverty and malnutrition, ("promoting health care including preventive health care") and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- (ii) promoting education, including special education and employment, enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- (iii) 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.
- (iv) 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);
- (v) 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;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents; (Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- (vii) training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports.
- (viii) contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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;
- (ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- (x) rural development projects.
- (xi) slum area development.

(xii) disaster management, including relief, rehabilitation and reconstruction activities

7. Implementation Mechanism

The Company shall undertake CSR activities:

- Directly; or
 - Through eligible implementing agencies registered with MCA, as per Rule 4 of CSR Rules
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8. Governance Structure

Constitution of the CSR Committee

As per section 135 read with "CSR Rules", the requirement for constitution of the Corporate Social Responsibility Committee is **not applicable**, and the functions of such Committee shall be discharged by the Board of Directors of the company.

Role of the Board

Pursuant to the provisions of Section 135 of the Companies Act, 2013 read with CSR Rules, the Board of the Company shall-

- (a) approve the CSR Policy for the Company and disclose contents of such Policy in its report and also place it on the company's website;
 - (b) approve the amount of expenditure to be incurred on CSR Activities;
 - (c) monitor the CSR Policy of the Company from time to time;
 - (d) ensure that the activities as are included in CSR Policy are undertaken by the company.
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9. CSR Budget

- The Company shall spend **at least 2% of the average net profits of the preceding three financial years**, as per Section 135 of the Companies Act, 2013.
 - The Board shall approve and allocate the CSR budget across projects.
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10. Annual Action Plan

The Board shall formulate an Annual Action Plan, which shall include:

- List of approved CSR projects
 - Manner of execution
 - Budget allocation
 - Implementation timeline
 - Monitoring and reporting mechanism
 - Impact assessment (if applicable)
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11. Monitoring & Reporting

- The Board shall monitor implementation through periodic reviews and reports
 - Proper documentation and impact tracking mechanisms shall be maintained
 - CSR disclosure shall be made in the Board's Report as per statutory format
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12. Treatment of Ongoing Projects

- Ongoing projects shall be implemented in accordance with CSR Rules
 - Project duration shall not exceed **3 years (excluding commencement year)**
 - Unspent amount for ongoing projects shall be transferred to **Unspent CSR Account within 30 days**
 - Amount shall be spent within 3 years, failing which transferred to Schedule VII fund.
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13. Treatment of Unspent Amount (Other than Ongoing Projects)

- Unspent CSR amount shall be transferred to a **Schedule VII Fund within 6 months** from end of financial year
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14. Treatment of Surplus

- Surplus arising out of CSR activities:
 - Shall not form part of business profits
 - Shall be reinvested in CSR activities
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15. Review & Amendments

- The Board may review and amend this Policy from time to time.
 - Amendments shall be in line with applicable laws and regulatory changes.
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For DE HEUS INDIA PRIVATE LIMITED

Director

