

PAUSHAK LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Details of Adoption / Amendments to the Policy				
Policy Adoption / Change effective Date	Clause No.	Particulars of the Adoption / Change	Board Approval Date	Version of Policy
01/04/2014	-	Adoption of Policy	01/05/2014	Original
31/01/2019	Various clauses	Pursuant to the amendments in Section 135 of the Companies Act, 2013 read with rules framed thereunder from time to time	31/01/2019	V-2

1. Objective:

The objective of Corporate Social Responsibility Policy ('CSR Policy' or 'Policy' as the context may require) is to lay down guidelines for undertaking Corporate Social Responsibility ('CSR') activities by Paushak Limited ('Paushak' or 'the Company'). This Policy is formulated in compliance with the requirements of Section 135 of the Companies Act, 2013 read with rules framed thereunder.

2. Philosophy of Alembic on CSR:

CSR is not a new term for Alembic Group. It has been proactively carrying out CSR activities since more than fifty years. It has established, nurtured and promoted various Non-Profit Organizations focusing on three major areas – Education, Healthcare and Rural Development.

3. General:

The Board of Directors (the "Board") of the Company has adopted this Policy at their meeting. The details of the original adoption and subsequent amendments, if any, are mentioned in the table provided at the beginning of the Policy.

Any term(s) not defined in the Policy shall have the same meaning as assigned to such term(s) in the Companies Act, 2013 and / or the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other applicable laws or regulations.

4. Effective Date:

This Policy is effective from 1st April, 2014.

5. Implementation:

- The Board of Directors has constituted a Corporate Social Responsibility Committee ('CSR Committee' or the 'Committee') with majority of its members being Independent Directors of the Company.
- The Committee shall directly or in consultation with implementation agency(ies), identify programs/projects in which the CSR activities can be undertaken and recommend to the Board from time to time.
- The programs/projects can be undertaken through companies incorporated under Section 8 of the Companies Act, 2013 or a registered Trust or a

registered Society, established by the Company, either singly or alongwith any other company or by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature.

- The programs/projects can also be undertaken through other companies, Trust(s) / NGO(s) / Implementation Agency(ies) / Local Government Authority(ies) / other(s) having established track record of three years in undertaking CSR activities. The Committee may invite such outside expert / consultant or any other person as it may deem fit for the purpose of CSR activities.
- CSR activities may also be undertaken in collaboration with other Companies.
- The Committee shall recommend to the Board, at the beginning of the financial year the amount to be spent on CSR activities for that financial year.
- The Committee may also recommend allocation of certain portion of the CSR spend for some identified activities/projects.
- The programs/projects which benefit only to the employees of the Company and their families shall not be considered for CSR activities.
- The Committee shall endeavor for CSR capacity building of the personnel of the Company and / or of the institution carrying CSR activities of the Company and not more than 5% of the total CSR budget shall be spent on such CSR capacity building exercise.

6. Projects or Programs to be Undertaken / Areas and subjects identified:

The CSR projects or programs or activities to be undertaken by the Company shall be in the areas and subjects specified in Schedule VII of the Companies Act, 2013.

The Committee shall from time to time decide/recommend to the Board on CSR activities to be undertaken, the geographical area covered, agency(ies) or Trust(s) or NGO(s) with which the projects/programs/activities are to be undertaken, amount to be spent on various projects, whether on going or fresh.

While deciding on the CSR activities, priority shall be given to the needs and requirements of communities or areas around which the Company operates.

The CSR programs or projects or activities that the Company plans to undertake directly or through Trusts or Societies, entities, NGO(s), Implementation Agencies or others and the modalities of execution / implementation of the same is as under:

Bhailal Amin General Hospital (BAGH):

Support BAGH in promoting healthcare including preventive healthcare through:

- a. Donation in cash or kind (medicines / drugs manufactured by the Company) to BAGH.
- b. Sponsorships of free medical check-ups for community in vicinity of the manufacturing facilities of the Company.
- c. Sponsorships of medical treatment for poor as recommended by committee of Doctors of BAGH.
- d. Sponsorship of equipped Ambulance or such other specific equipment as may be required by BAGH.

Rural Development Society (RDS):

Support RDS in promoting following initiatives through donating in cash or kind as may be required by RDS:

- a. Running of School with Hostel for students of poor families free of cost.
- b. Operating Medical Dispensary with qualified doctor for preliminary medical facilities to the poor patients free of cost.
- c. Conducting Vocational Training Courses for carpentry, Plumbing, Electrician, tailoring, etc. with a view to make people self-reliant.
- d. Undertaking various activities with the objective of development of local villages by running sanitation campaigns, de-addiction programs, Mal-Nutrition awareness programs and HIV/AIDS awareness programs.

Alembic CSR Foundation:

Support Alembic CSR Foundation in promoting following initiatives through donating in cash or kind as may be required by Alembic CSR Foundation:

- a. Adoption of Schools in tribal / backward areas.
- b. Sanitation.
- c. Community outreach programs.
- d. Adoption of Children's homes / Government institution for destitutes.
- e. Rural Development Projects.
- f. Healthcare including preventive healthcare.
- g. Promoting Education.
- h. Promotion of Sports.

- i. Promotion and Development of Traditional Arts and Handicrafts.
- j. Flood relief activities.
- k. Employment enhancing vocational skills.
- l. Other areas / activities prescribed under Schedule VII of the Companies Act, 2013.

Spread of Education at affordable cost to students of poor or low income groups through the following trusts, by donations in cash or kind:

- a. Uday Education Society.
- b. Bal Utkarsh Society.
- c. Utkarsh Vidya Kendra.
- d. Vidyanidhi Trust – Bangalore.
- e. Ujjwal Vidyalaya – Bangalore.

The Company shall follow a planned model for CSR activities which are sustainable over long-term and has a direct and/or long term sustainable benefit / impact on the life of the beneficiaries of such programs. The Company may also undertake multiple projects annually, the requirement of which may be recognized due to an immediate need of a particular section of the society. The implementation schedule of various programs or projects or activities shall be guided by the above.

7. CSR Expenditure:

CSR expenditure shall include all expenditure including contribution to corpus, or on projects or programmes related to CSR activities approved by the Board of the Company on the recommendation of the Committee. It will include contribution to bona fide charitable and other funds.

CSR activities shall not include the activities undertaken by the Company in the normal course of business.

The surplus, if any, arising out of the CSR projects or programs or activities shall not form part of the business profits of the Company.

8. Monitoring Process:

- The Committee shall monitor the above projects, programs, activities and implementation and execution of the same from time to time and report the same to the Board of Directors on a periodical basis.

- The Committee shall on completion of every financial year, submit to the Board, details of the CSR spent during the financial year and reasons for the actual spent being less than the limits prescribed by the law, if any.
- The report on CSR shall form part of Board's Report of the Company.
- The Committee shall recommend changes/editions to be carried out in the policy to the Board from time to time.

9. Disclosures:

The Company shall disclose this Policy on its website and a web-link thereto shall be provided in the Annual Report of the Company.

10. Amendment:

The Board shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy.
