

KRITI NUTRIENTS LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY
(APPROVED BY BOARD OF DIRECTORS ON 27TH OCTOBER, 2020)

1. OUR CSR INITIATIVE-

Corporate Social Responsibility ("CSR"), at Kriti Group is a genuine and sustainable investment in the community to help the lives of the disadvantaged by supporting and engaging in activities that aim to improve their well being & socio-economic development. This is a conscious and committed effort to contribute in every possible way we can. We believe that through effective CSR outreach, we have the extraordinary opportunity to redefine the way in which a company can help enable change in the world.

2. OUR FOCUS-

Kriti Nutrients Limited is eligible to undertake any suitable activity as specified in schedule VII to the Act, however, at present, it propose to undertake any of the below mention relevant activities on priority basis-

(i) Eradicating hunger, poverty and malnutrition, ²["promoting health care including preventive health care"] and sanitation ⁴[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, agro forestry, conservation of natural resources and maintaining quality of soil, air and water ⁴[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, ⁹[Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows];

(vii) Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports

(viii) contribution to the prime minister's national relief fund ⁸[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]

³[(xi) slum area development

2. OUR CSR COMMITTEE

Our CSR Committee in order to drive and oversee all its social development initiatives, Kriti Nutrients Limited has constituted the CSR (Corporate Social Responsibility) Committee. The committee functions as per Kriti vision, mission, CSR policy and strategy; guided by the global CSR objectives and guidelines. The committee comprises of independent Board members and will be supported by senior leaders of Kriti. The members of the CSR Board Committee are:

1. Mr. Shiv Singh Mehta – Managing Director (Chairman)
2. Mrs. Purnima Mehta- Whole Time Director
3. Mr. Rakesh Kalra- Independent Director

3. MEETINGS:

(1) Meetings: The meetings of the Committee shall be held as and when required and as statutorily required under the provisions of Companies Act, 2013 and Rules made there under and as per the applicable law, if any, for the time being. The Chairman shall preside over all Committee meetings. However, the Chairman of the company (whether executive or non-executive) may be appointed as a member of the Committee but shall not chair such Committee.

(2) Quorum: The quorum for the Committee meeting shall be one third of its total strength or two directors, whichever is higher, and the participation of the directors by video conferencing or by other audio visual means shall also be counted for the purposes of quorum.

(3) Secretary and Minutes: The Company Secretary shall act as the secretary for Committee meetings. Minutes of the meetings shall be recorded and maintained by the Company Secretary and shall be presented to the Committee for approval at its subsequent meeting

4. GOVERNANCE

The approval of the CSR policy and oversight is the responsibility of Board of Directors. The responsibility of the CSR Committee is to promote the strategy and to administer the policy through implementing partner(s) or via self-implementation. The CSR Committee shall provide guidelines for projects/partner selection to the respective HR or CSR teams, wherever applicable. The CSR Committee shall ensure that projects/programmes are compliant with regulations and are monitored and reported effectively.

As the Company's CSR activities evolve, the policy may be revised by the CSR Committee and approved by the Board of Directors.

4. CSR SPEND

The CSR Committee shall recommend the amount of expenditure to be incurred on the CSR activities to be undertaken by the Company as specified in Schedule VII of the Companies Act 2013, as amended from time to time.

In case of any surplus arising out of CSR projects, the same shall not form part of business profits of the Company.

5. IMPLEMENTATION

The Company shall undertake CSR project/programmes identified and approved by the Board of Directors in line with the CSR Policy.

The Company shall implement its CSR programmes/projects:

Through an implementation partner that can be a public charitable trust or a society registered under applicable Acts or a Company registered under Section 8 of the Companies Act 2013; or on its own,

Through its own foundation like Sakam trust specifically created for implementing its CSR initiatives.

4. The Company may enter into partnerships or alliances with NGOs, Trusts, or other Corporate Foundations etc. to effectively implement its CSR programmes/projects.

The Company may also implement programme in collaboration with other company (ies), if permissible and feasible.

The Company shall formulate criteria and procedure for selection, screening and due diligence of its implementing partners.

6. MONITORING AND REPORTING

The CSR Committee will oversee the implementation and monitoring of all CSR projects/programmes and periodic reports shall be provided for review to the CSR Committee.

The Company will institute a well-defined, transparent monitoring and review mechanism to ensure that each CSR project/programme has:

1. Clear objectives developed out of the socio-economic needs, that may be determined through need assessment studies and research (secondary or primary);
2. Clear targets, time lines and measureable indicators, wherever possible;
3. A progress monitoring and reporting framework that is aligned with the requirements of Section 135 of the Companies Act 2013 and the CSR Rules.