

**TOSHVIN ANALYTICAL PRIVATE LIMITED (“TAPL”)
CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY**

INTRODUCTION:

The Companies Act, 2013 has made it mandatory for certain companies to carry out its CSR activities in accordance with Section 135 of the Companies Act, 2013, Schedule VII of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2013. In order to comply with the requirements of the law, Toshvin Analytical Private Limited (“TAPL” or the “Company”) has framed the Toshvin Analytical Private Limited Corporate Social Responsibility Policy (the “TAPL CSR Policy”).

1. Objective:

The Company has framed the TAPL CSR Policy to identify and support initiatives aimed at:

- (i) eradicating hunger, poverty and malnutrition, promoting health care and sanitation and improving the quality of life and economic well - being of individuals;
- (ii) training, providing and supporting educational needs of the underprivileged segments of society; and
- (iii) such other activities as may be permissible under Schedule VII of the Companies Act, 2013 and the relevant rules.

2. CSR Activities:

- (i) The CSR activities proposed to be undertaken by the Company shall include, however will not be limited to, the following activities:
 - (a) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and making available safe drinking water.
 - (b) Promoting education including special education and employment, enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
 - (c) 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.
 - (d) 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.

- (e) 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 arts and handicrafts.
- (f) Measures for the benefit of armed forces veterans, war widows and their dependents.
- (g) Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports.
- (h) Contribution to Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.
- (i) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government.
- (j) Rural development projects.
- (k) Slum area development.
- (l) Such other activities as may be permitted under the Companies Act, 2013 and the rules made thereunder.

(ii) The following activities **shall not be considered** as CSR activities undertaken by the Company:

- (a) Programs or activities that benefit only the employees of the Company and their families.
- (b) Amounts contributed, directly or indirectly, to any political party under Section 182 of the Companies Act, 2013 and the rules made thereunder.
- (c) Activities undertaken in the normal course of business of the Company.

(iii) The Company shall give preference to the local area and areas around where it operates, for spending the amounts earmarked for CSR activities.

3. CSR Committee:

Section 135 of the Companies Act, 2013 and the rules made thereunder require the incorporation of the Corporate Social Responsibility Committee having a minimum of two directors. TAPL has constituted a Corporate Social Responsibility Committee (the "CSR Committee") comprising of two directors.

The terms of reference of the Committee are as under:-

- To formulate and recommend to the Board of Directors of the Company a corporate social responsibility policy indicating the activities to be undertaken by the Company in accordance with the requirements of Schedule VII of the Companies Act, 2013.

- To recommend the amount of expenditure to be incurred on the CSR activities to be undertaken by the Company.
- To monitor the CSR policy of the Company from time to time.

The current composition of the CSR Committee is as follows:

- (i) Mr. Nakul Toshniwal - Chairman
- (ii) Mr. Manish Pandit - Member

The CSR Committee will meet at regular intervals for the above purpose.

4. CSR Expenditure:

(i) The CSR Committee shall endeavour to spend at least 2% of the average net profits of the Company, made during the preceding three financial years on CSR activities as enumerated above.

(ii) CSR expenditure shall include expenses on all CSR activities approved by the Board of Directors of the Company on the recommendation of the CSR Committee. However, the CSR expenditure shall not include any expenses on such activities which are not in conformity or not in line with the activities as detailed in Schedule VII of the Companies Act, 2013.

(iii) Any surplus arising out of CSR projects or programs or activities shall not form part of the business profit of the Company.

5. Implementation:

The projects / programs covered under the CSR activities of the Company shall be implemented in the following manner:

- (i) The CSR Committee will broadly define the activities and review the work of the CSR team to ensure that the TAPL CSR Policy is implemented and that the initiatives undertaken by the CSR team are in accordance with the TAPL CSR Policy.
- (ii) Collaborate with other companies or organizations that undertake CSR activities.
- (iii) Collaborate with any other institutions, non-governmental organizations, government, semi-government or autonomous bodies, trusts, etc. to undertake CSR activities. However, projects / programs for which the Company proposes to collaborate with

such organizations shall require such organizations to have an established track record of three years in implementation of such projects / programs.

6. Monitoring & Reporting:

- (i) The CSR Committee will be responsible for:
 - (a) monitoring the activities undertaken for the CSR;
 - (b) providing guidance in the implementation of CSR activities; and
 - (c) to regularly report to the board of directors the activities undertaken for the CSR.

- (ii) The CSR Committee shall report to the Board of Directors the amounts spent towards CSR activities from time to time.

7. Continuous Monitoring:

- (i) The CSR Committee will be updated on a regular basis regarding the amount spent on CSR activities in the format prescribed under the Companies (Corporate Social Responsibility Policy) Rules, 2014.

- (ii) The Board of Directors of the Company will also review the implementation of the CSR activities at regular intervals.

8. Disclosures:

All relevant disclosures required to be made in the Annual Report of the Company pertaining to CSR including the details of the CSR Policy, the CSR Committee, the CSR activities undertaken by the Company, the CSR expenditure during the relevant financial year and other information as may be required under law, Sections 134 and 135 of the Companies Act, 2013, Schedule VII of the Companies Act, 2013, the Companies (Corporate Social Responsibility Policy) Rules, 2014 and any other applicable laws.