

BOROSIL LIMITED

Corporate Social Responsibility Policy

A. Purpose of the Borosil Limited's CSR Policy

The Corporate Social Responsibility ("CSR") Policy of Borosil Limited ("the Company") has been drafted in consonance with Section 135 of the Companies Act 2013 read with the Rules thereunder ("the Act") to lay down the guidelines for undertaking Corporate Social Responsibility ("CSR") initiatives. This Policy shall apply to all CSR projects/ programs undertaken by the Company as per liberal interpretation of activities listed in Schedule VII of the Act, within the geographical limits of India, preferably towards the benefits of marginalised, disadvantaged, poor and deprived sections of the community and the sustainable environment.

B. Scope

The CSR Policy of the Company contains the approach and direction given by the Board of Directors ('Board'), taking into account the recommendations of the CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the CSR Annual Action Plan.

This Policy is intended to be in conformity with the provisions of Act. In case of any contradiction between this Policy and provisions of the Act, the latter shall prevail.

Any new provision arising out of amendments to Act shall be construed to be a part of this policy.

C. Projects and Programs that are to be undertaken

The Company may undertake any one or more of the activities, as mentioned in Schedule VII of Act, as may be decided by the Board on the recommendation of the CSR Committee, from time to time, depending on the suitable opportunities available and need of the area concerned.

D. Guiding principles for selection of CSR Activities

The CSR Committee shall identify any one or more of the projects / programmes specified in Schedule VII of the Act, on a year to year basis, for CSR activities of the Company. The CSR Committee shall recommend to the Board, CSR activities and expenditure thereof, in the identified projects / programmes. The Board shall approve CSR activities and expenditure thereof taking into account the recommendations of the CSR Committee. The CSR activities to be undertaken by the Company shall not include any of the activities prohibited under the Act.

E. Implementation of CSR activities

The Company shall implement the identified CSR Projects / Programmes by the following means:

1. The Company may itself implement the identified CSR Projects / Programmes;
2. The Company may undertake the CSR activities through eligible implementing agencies prescribed under the Act;
3. The Company, may collaborate with other companies, including its Group Companies / Companies under common control, if required, for fulfilling its CSR objectives provided

that the CSR Committees of respective companies are in a position to monitor separately such CSR activities.

F. Funding

For achieving the CSR commitment, the Company shall allocate at least 2% of the average net profit of the three immediately preceding financial years or such amount as may be prescribed in the Act, as its Annual CSR budget. Any amount remaining unspent, shall be utilized in the manner as prescribed in the Act. Further, in case any excess amount has been spent, then such amount may be set off in such number of succeeding financial years as prescribed in the Act.

G. Annual Action Plan

The CSR Committee shall recommend CSR activities and expenditure thereof, in the form of an Annual Action Plan, to the Board. The Annual Action Plan shall include details as specified in the Act and such matters as the CSR Committee may deem fit from time to time.

The Board may alter such plan at any time during the financial year, as per the recommendation of CSR Committee.

H. Monitoring of CSR activities

The CSR Committee shall be apprised on the CSR activities and the progress shall be monitored by the Committee at such frequency as it may deem fit. In case of any ongoing project / program, the Board shall monitor the implementation of the project / program with reference to the approved timelines and year wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project / program within the overall permissible time period.

The monitoring mechanism for each CSR activity shall be recommended by the CSR Committee and approved by the Board. Impact assessment of CSR activities shall be undertaken, if required and applicable under the Act. The Annual Report on CSR activities in the format prescribed under the Act shall be placed before the CSR Committee and the Board for approval.

The Chief Financial Officer of the Company shall certify to the Board on an annual basis that the funds disbursed by the Company towards CSR activities have been utilised towards the same effect.

I. Amendments to the Policy

The Board of Directors, either on its own or as per the recommendations of CSR Committee, can amend this Policy, as and when required. The decision of the Board of Directors on all matters, relating to this Policy, shall be final and binding upon all concerned. This Policy is subject to continuous review and updates as required from time to time.

This Policy (Ver.1) was initially approved by the Board of Directors at its meeting held on February 3, 2020, and subsequently amended on February 07, 2025 (Ver 2).