

Ellenbarrie Industrial Gases Limited **Corporate Social Responsibility Policy**

Ellenbarrie Industrial Gases Limited (“the Company”) has always endeavored to conduct its business responsibly, mindful of its social accountability, respecting applicable laws and with regard for human dignity. The company’s long- term CSR objective is “to improve the quality of life of the communities we serve through long term value creation for all stakeholders”, which is in alignment with the company’s Core Purpose.

In compliance with the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, the Company is, inter alia, required to:

- (i) Constitute a Board Committee to formulate and recommend to the Board a Corporate Social Responsibility (CSR) Policy, recommend the amount of CSR expenditure and monitor the CSR activities of the Company from time to time.
- (ii) Ensure that the Company spends, in every financial year, at least two per cent of the average Net Profits before Tax (PBT) of the Company, made during the three immediately preceding financial years, in pursuance of its CSR Policy.

1. CSR Philosophy:

CSR is traditionally driven by a moral obligation and philanthropic spirit which resonates in the policy of the Company.

Our Vision:

- Fair & Ethical: The company is committed to conduct its business in a fair and ethical manner, take up responsibility to create a good impact in the society that it belongs;
- Giving back to the society through CSR activities is company’s moral duty
- The company aims to fulfill regulations laid down under Companies Act, 2013 and act diligently to comply with applicable rules & regulations w.r.t CSR

2. Objective & Scope of the CSR Policy:

Purpose of this policy is to serve as a guiding principle for selection and undertaking of CSR programs from time to time. CSR committee shall be overall responsible for implementation of the policy.

- Role of CSR Committee:
 - o Formulate and recommend to the Board a CSR Policy
 - o Recommend amount of expenditure to be incurred within a financial year
 - o Monitor implementation of the CSR Policy on a time to time basis
 - o Any other matter the Committee may consider important in furtherance of / compliance of the CSR Policy of the Company

- Responsibility of the Board:
 - o Forming and composition of the CSR Committee
 - o Approving CSR Policy
 - o Approving CSR budget, Annual Action Plan and approve actual expenditure statements
 - o Communication of CSR Policy within the company and to the outside world, placing it on company website
 - o Approve Compliance report

3. Areas of Operations for CSR Activities:

While selecting Company's CSR initiatives CSR teams may choose programs generally within the areas of operations as mentioned in the following table.

The company may also support initiatives beyond its areas of operation, subject to approval by the CSR Committee of the Board, from time to time.

	Category	Broad Area of Operation	Focus / Thrust Area of Operation
1	Geographical reach	All of India, all the states	Locations where company's operations are established so that employees may volunteer easily
2	Communities to serve	Urban as well as Rural	<ul style="list-style-type: none"> - Socially & economically marginalized members amongst communities - Women & girl children, widowed parents - Workers and their children
3	Activities to undertake	<ul style="list-style-type: none"> - Conservation of Natural Resources - Disaster Relief - Entrepreneurship Development - Education - Environment / Sustainability - Health Care & Sanitation - Livelihood enhancement - Rural Development - Skill Development - Sports & Culture <p>Please refer to <u>Annexure-A</u> for further details of activities</p>	

4. Implementation /Delivery Mechanism:

Whilst a large part of the CSR efforts of the Company will be implemented by an in-house CSR department and through different Societies/Trusts. The company will also partner with credible organizations – individually or as a consortium – to design, fund, implement and review projects.

4.1 Identification of a Project / Program:

A CSR Project / Program can be carried out either (i) by the Company directly through its departments, or (ii) through contribution to a Registered NGO, or (iii) by donation to a Government agency

- SOP for selection and approval of a program to be undertaken by the company should be as per **Annexure-B**
- SOP for selection and approval of a program to be undertaken through an NGO should be as per **Annexure-C**
- SOP for selection and approval of a program to be undertaken by way of donation to a Government should be as per **Annexure-D**

4.2 Allocation & Spending:

- o Finance & Accounts Department (F&A) should maintain a separate account of the CSR Spending as a whole and clearly identifying amount budgeted and spent for each program
- o F&A to present updates before the CSR committee at least once each quarter
- o CS / Secretarial Department to present a Quarterly Checklist cum Activity Report to the CSR Committee (Please refer to **Annexure – E**)
- o CSR Committee to adopt and present a detailed activity report to the Board at least twice during each FY. Activity Report to contain details on selection of programs, status of approved programs, impact assessment & further recommendation
- o Snapshots of Half Yearly CSR Activity Report may be displayed on Company website after due approval

4.3 Closure of a Program:

Finance & Accounts Department (F&A) should maintain a separate account of the CSR

5. Governance Mechanism:

A Steering Committee comprising senior management under the chairmanship of the Managing Director of the company shall short list the projects and recommend to CSR committee for approval. It will also periodically review the activities, provide requisite resources and monitor progress against targets set.

Secretarial Department / Company Secretary shall be responsible for overall compliance of the requirements of CSR Regulations and provide a quarterly compliance reports addressed to the CSR Committee / MD.

6. Review of Policy

This CSR policy document will be reviewed from time to time and any changes, if necessary, will be approved by the CSR Committee of the Board.

CSR Interventions
(Schedule VII of Companies Act, 2013)

Healthcare and Sanitation:

- Health check-up camps in villages
- Provide medical treatment to needy and poor patients
- Health awareness program for women, adolescents and children
- Promoting awareness on various health issues i.e. HIV/ AIDS, Malaria, and Reproductive health, hygiene & sanitation, etc.
- Provide Bore wells, Tube wells, and Ring wells and maintenance of these units to ensuring access to drinking water
- Construction of Rural household toilets.
- Supplement to government health systems to reduce IMR, MMR, etc. and making people aware on government health facilities.
- Support to government health infrastructure

Education

- Improving quality of education in existing schools
- Introducing technology to improve quality of education
- Building capacity of the teachers to promote inclusive and joyful learning in the classes at pre-primary and school level
- Support for co-curricular activities i.e. sports, quiz, song, speech competitions etc.
- Supplement by engaging additional teacher / staff based on the need
- Remunerate the teachers taking extra coaching classes in colleges/schools provide scholarship and financial assistance to needy students' adult literacy program
- Health check-up camps in schools
- Provide dietary mid-day-meal nutrient supplements in AWCs and Pry. Schools
- Working towards the retention of students in schools, stopping child labour issues and school dropouts.
- Providing infrastructure for Anganwadi centers, Schools & educational institutions
- Construction of classrooms, library rooms and science/computer labs, boundary walls and toilets.
- Renovation / repair of old school building / boundary walls etc.
- Construction of kitchen-cum-dining units
- Providing water filters, books, furniture, computers and other educational / sports aids.

Livelihood Enhancement:

- Develop and support SHGs especially amongst women
- Facilitate, train, and support farmers self-help groups and provide farming equipment for seasonal, multi crop harvesting and cash crop farming.
- Set up local skill development center for (Driving, Tailoring, BPO) for local youths and ladies.
- Sponsor poor and economically backward youths for skill development and vocational training programs
- Exposure visits of farmers/young entrepreneurs for technical inputs
- Promote self-employment by training the villagers in poultry & animal husbandry

Environment Sustainability:

- Undertake afforestation and avenue plantation
- Develop water bodies and support rainwater harvesting
- Promote use of renewable sources of energy
- Conduct environmental awareness programs
- Undertake watershed measures

Rural Infrastructural Projects

- Repair/ reconstruction of village roads, culverts ,and pond embankments
- Construction of passengers' rest sheds
- Provide Bore wells, Tube wells, and Ring wells and maintenance of these units
- Drinking water moats for domestic animals
- Build water shed projects and support lift irrigation ventures
- Rural electrification projects either through installation of solar streetlights or providing conventional streetlight fittings.
- Construction of drains, foot over bridges over Nallahs and rivulets.
- Construct bathing points in village ponds, streams etc.

Sports & culture

- Organize sports / tournaments for community and schools
- Construction of community centers, open cultural stage, sports complex etc.
- Sponsor recreational utilities & sports items to clubs / schools / villages
- Promote ethnicity, supporting cultural program, skit plays and HO dance in the community and region.

Disaster relief:

- Extending relief measures during times of natural disasters, anywhere in the country.
- Undertaking and supporting rehabilitation measures post disasters
- Contribute to the Prime Minister's National Relief Fund.
- Contribute to any other fund set up by Central Government for socio economic development relief welfare of the Scheduled Caste, the Scheduled Tribes, other backward classes, minorities and women

Checklist cum Approval form for CSR Program through the Company

Program No.: _____

Date: _____

Serial	Particulars	Y/N	Information
1	Brief Name of Program:		
2	Whether the Program is falling within ambit of the Schedule-VII of Companies Act(detailed in Annexure-A) If yes, please describe the category		
	Is the Program falling within Company's CSR policy – focus / thrust area		(If No, specific CSR committee approval to be obtained)
3	Is the Program attracting any of the following criteria?		
	- An activity carried outside India		(If Yes, not eligible under CSR Regulations)
	- An activity directly / indirectly contributing to any political party		(If Yes, not eligible under CSR Regulations)
	- An activity benefitting employees of the Company		(If Yes, not eligible under CSR Regulations)
	- An activity deriving marketing benefits for the Company's products or services		(If Yes, not eligible under CSR Regulations)
	- An activity carried out for the purpose of fulfilling any other statutory obligation of the Company		(If Yes, not eligible under CSR Regulations)
4	Location where the Program is to be implemented		
5	Ultimate Beneficiary of the proposed program		
6	Budget & implementation time frame - Details of budgeted expenditure: Nature of expenditure-wise FY-wise (spending within max. 3 years) - Proposed Department to carry out the program - Proposed Allocation of overhead for the Program (not to exceed 5% of total expenditure)		(Please attach separate excel sheet with details, and only present the summary here)

Prepared by: (Name)	 (Sign)	CSR/Secretarial Dept: (Name)	 (Sign)
F & A Dept: (Name)	 (Sign)	MD: (Name)	 (Sign)
CSR Committee Approval: (if Required)	 (Sign)	Board Approval: (If Required)	 (Date of Board Meeting where approval obtained)

Checklist cum Approval form for CSR Program through the NGO

Program No.: _____

Date: _____

Serial	Particulars	Y/N	Information
1	Brief Name of Program:		
2	Whether the Program is falling within ambit of the Schedule-VII of Companies Act(detailed in Annexure-A) If yes, please describe the category		
	Is the Program falling within Company's CSR policy – focus / thrust area		(If No, specific CSR committee approval to be obtained)
3	Is the Program attracting any of the following criteria?		
	- An activity carried outside India		(If Yes, not eligible under CSR Regulations)
	- An activity directly / indirectly contributing to any political party		(If Yes, not eligible under CSR Regulations)
	- An activity benefitting employees of the Company		(If Yes, not eligible under CSR Regulations)
	- An activity deriving marketing benefits for the Company's products or services		(If Yes, not eligible under CSR Regulations)
	- An activity carried out for the purpose of fulfilling any other statutory obligation of the Company		(If Yes, not eligible under CSR Regulations)
4	Brief details of the NGO:		
	Name of the NGO:		
	Constitution of the NGO: (Section 8 company / Registered Trust of Society)		(Enclose MOA/AOA, Trust Deed, Soc. Registration no. etc.)
	Brief Objects of the NGO: (NGO object has to be to undertake CSR activities)		
	No. of years the NGO is in operation:		
	Has the NGO filed CSR-1 with the MCA: (what is it's unique Registration no.)		(Enclose copy of CSR-1 form)
	Has the NGO given Letter of Acceptance for the Program:		(Enclose copy of the Letter)

5	Location where the Program is to be implemented:		
6	Ultimate Beneficiary of the proposed program		
7	Budget & implementation time frame - Details of budgeted expenditure: Nature of expenditure-wise FY-wise (spending within max. 3 years) - Proposed Department to carry out the program - Proposed Allocation of overhead for the Program (not to exceed 5% of total expenditure)		(Please attach separate excel sheet with details, and only present the summary here)

Prepared by: (Name)	 (Sign)	CSR/Secretarial Dept: (Name)	 (Sign)
F & A Dept: (Name)	 (Sign)	MD: (Name)	 (Sign)
CSR Committee Approval: (if Required)	 (Sign)	Board Approval: (If Required)	 (Date of Board Meeting where approval obtained)

Checklist cum Quarterly Activity Report

Report for period: _____ to _____

Date of Report: _____

Serial	Particulars	Compliance (Y / N), & brief Details
1	Last 3 years' - Net Worth \geq INR 500 Cr - Turnover \geq INR 1000 Cr - Net Profit \geq INR 5 Cr.	
2	Actual Amount Spent on CSR During Last 2 FYs and Current FY:	
3	Present CSR Committee: - Sri - Sri - Sri	
4	Details of Various CSR Programs undertaken to capture following summary: - Program No. & Name - Brief Details of the Program - Approved Budget for each Program - Actual YTD Spending for each Program - FY wise actual amount spent - Name of Key Account Manager (KAM) for the Program - Level of Completion of each Program - Link to photo archive / document archive for each - Remarks, if any	
5	Impact Assessment Report to capture following summary: - Program No. & Name - Brief Details of the Program - Date of Completion of the Program - Date of Impact Assessment - Name of Person / Agency assigned with Impact Assessment - Key Findings / Recommendation	