

CORPORATE SOCIAL RESPONSIBILITY POLICY



JUBILANT INDUSTRIES LIMITED

Effective Date	April 01, 2022
Recommended by	Sustainability and Corporate Social Responsibility Committee
Approved by	Board of Directors

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JUBILANT INDUSTRIES LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. TITLE AND APPLICABILITY

1.1 Preamble

Jubilant Industries Limited (the “Company”) is the flagship Company of Agri, Performance Polymers, Retail and manufacturing of Indian Made Foreign Liquor (IMFL) businesses of the Jubilant Bhartia group. The Company’s diversified portfolio includes a wide range of Crop Nutrition, Crop Growth and Crop protection Agri products, Performance Polymers products comprising consumer products like adhesives, wood finishes; food polymers and latex such as Vinyl Pyridine, SBR and NBR latex.

The Company’s success so far in this business is an outcome of its strategic vision to attain leadership position in each of its business. Driven by a culture of innovation the Company focuses on delivering world class products and services to its customers.

The Company is engaged in various social initiatives across the country. In order to provide further impetus to the social interventions and make the entire process and activities more impact driven, it is imperative to outline the guidelines on the Corporate Social Responsibility into a policy pursuant to the provisions of the Companies Act, 2013 (the “Act”) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the “CSR Rules”).

1.2 Definitions and Interpretations

“**Board**” means the Board of Directors of the Company.

“**CSR Activities**” means such programs and projects as may be recommended by the CSR Committee and approved by the Board in terms of the CSR Policy, from time to time. The current programs and projects identified by the CSR Committee are listed in Annexure I to this CSR Policy.

“**CSR Committee**” means the Sustainability & Corporate Social Responsibility Committee of the Company.

“**CSR Expenditure Budgeted**” means the amount recommended by the CSR Committee and approved by the Board from time to time, to be incurred on the CSR Activities in India in a financial year in terms of Section 135 of the Act and the CSR Rules. CSR expenditure will include all expenditure incurred by the Company on CSR Programmes undertaken in accordance with the approved Annual Action Plan.

“**Annual Action Plan**” will include the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII to the Act, the manner of execution of such projects or programmes, modalities of utilisation of the CSR funds and implementation schedules for the projects or programmes, monitoring and reporting mechanism for the projects or programmes and details of need and impact assessment for the projects undertaken by the Company. The CSR Committee would recommend the Annual Action Plan to the Board. In case there is any alteration in the Annual Action Plan at any time during the year, the CSR Committee would update such alteration to the Board.

“**Ongoing Projects**” means projects that have a multi-year implementation focus but not having timelines exceeding three years excluding the financial year in which it commences. The CSR Committee may also designate some of the existing CSR project as Ongoing Projects and such Ongoing Projects shall be selected, implemented, monitored and reported in accordance with the applicable CSR Provisions.

Any term used but not defined in this CSR Policy shall have the meaning assigned to it under the Act or the CSR Rules.

1.3 Title and Scope

This Policy:

- I. shall be called the “Corporate Social Responsibility Policy” or “CSR Policy” of the Company which is developed and implemented in accordance with the provisions of Section 135 of the Act read with the CSR Rules.
- II. outlines the Company’s philosophy and responsibility and lays down the guidelines and mechanism for undertaking socially impactful programs towards welfare and sustainable development of the community around the area of its operations and other parts of the country.
- III. shall be applicable to all CSR Activities taken up by the Company at various locations in India for the benefit of different segment of the society at large, specifically the deprived and underprivileged segment.

2. VISION, MISSION & OBJECTIVES

Corporate Social Responsibility is the commitment of businesses to contribute to sustainable economic development by working with the employees, their families, the local community and the society at large to improve their lives in ways that are good for business and for its development.

2.1 Vision

To follow global progression in the concept of Corporate Social Responsibility and its implementations by way of being beneficial to our society and the corporations to which we render services.

To ensure benefit to society and to the corporation for sustainable development by imparting measurable values to all stakeholders in every aspect of our operations.

Ensuring Corporate Social Responsibility is adopted through principled implementations that contribute to our country’s social, cultural, and environmental development and help in developing the awareness on these issues.

2.2 Mission & Purpose

To work on the popularity, adoption, and implementation of the concept of Corporate Social Responsibility while adding measurable values to the community and to our corporation along with managing related processes to the advantage of all concerned in a way that becomes model for other corporations for replication, to further expanding the scope.

2.3 Objectives

The CSR Policy is laid down by the Company to ensure that the:

- CSR agenda is integrated with the business
- Focussed efforts are made in the identified community development areas to achieve the expected outcomes
- Support in nation building and bringing inclusive growth through our CSR programs

2.4 Governance

The Board monitors and reviews the performance and impact of the CSR programmes, provides input and course corrections if required and satisfies itself that the CSR funds so disbursed have been utilized for the purposes and in the manner as approved by it. The CFO or a person responsible for financial management shall certify to the fact that CSR funds so disbursed have been utilised for the purposes and in the manner approved by the Board.

3. GUIDING PRINCIPLES

3.1 Our CSR is to have

- Respect for all stakeholders
- Devotion to work ethics
- Data and document discretion
- Honesty in the flow of information
- Continuity relations based on customer satisfaction

3.2 The CSR Activities may relate to one or more activities listed in Schedule VII to the Act. This is subject to amendment of the Act and/or Rules from time to time.

3.3 The CSR Activities to be undertaken by the Company during each financial year along with the particulars of projects, planned expenditure and implementation schedule are outlined in Annexure I to this CSR Policy.

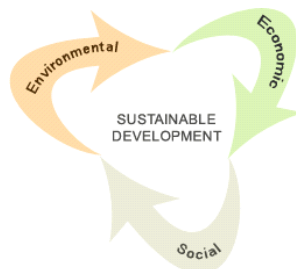
Our Promises



Our Values drives our actions....



At Jubilant we have embraced a three dimensional path to sustainability



4. CHARTER ON CSR (IMPLEMENTATION APPROACH AND MODALITIES)

4.1 FOCUS AREA OF INTERVENTION

- (i) The Company has identified the following focus areas of intervention:
- Improving health indices through innovative services and promoting health seeking behavior;
 - Universalizing elementary education and improving quality parameters for primary education through community involvement;
 - Enhancing employability through vocational training; and
 - Supporting the community infrastructure as and when identified in the project area.
- (ii) The Company shall implement the CSR Activities stipulated in Annexure I to this CSR Policy. The said annexure shall be re-drawn every financial year in relation to the CSR Activities proposed to be undertaken in that financial year.

4.2 PROGRAMME IMPLEMENTATION APPROACH AND PROCESS

The Company shall implement all CSR Activities in the project mode in compliance with the provisions of Section 135 of the Act read with the CSR Rules.

While implementing such projects, all possible efforts shall be made to define the following:

- (i) Programme Objective
- (ii) Need Assessment/ Baseline Survey - It would give the basis on which the outcome of the programme would be measured
- (iii) Duration of the programme
- (iv) Funds allocated to the programme
- (v) Implementation schedule
- (vi) Responsibilities and authorities
- (vii) Major results expected and measurable outcome
- (viii) Effective monitoring and evaluation
- (ix) Programme Documentation

4.3 MODE OF IMPLEMENTATION

- A. The CSR Activities shall be executed through one or more of the following modes:
- (a) directly by the Company; or
 - (b) by Jubilant Bhartia Foundation ("JBF"), a social wing of Jubilant Bhartia group established in 2007 and a non-profit organization (incorporated under Section 25 under the Companies Act, 1956).
- B. CSR programmes may be implemented with the active participation of the concerned local stakeholders. These interventions may also be synergized with the initiatives undertaken by the State Government, District Administration as well as Departments.
- C. The Company will identify the projects recommended by JBF which are falling within the purview of Schedule VII to the Act and provide funds to JBF. The funds will be utilized by JBF for the identified projects. JBF will maintain a separate account for each project at each location and ensure to provide the details of expenditure / reports for each project, in a manner as may be desired by the Company from time to time.
- D. Further, based on the review of the CSR Committee, the Board may amend Annexure I to the CSR Policy on an annual basis at the end of each financial year.

4.4 LOCATION OF CSR PROJECTS / PROGRAMMES / ACTIVITIES

The CSR Activities, whether undertaken by the Company itself or through JBF, shall be carried out in and around the areas of the Company's manufacturing locations / offices.

However, the CSR Committee may identify other areas for CSR Activities, from time to time and obtain necessary approval from the Board.

4.5 PROGRAMME DURATION

The time period of implementation of the programme will depend on its nature, extent of coverage and the impact of the programme.

The Company will follow a project based accountability approach to stress on the long term sustainability of its CSR projects. Based on the tenure of the identified projects, they will be qualified as:

- i. Short Term - upto 1 year
- ii. Long term / Ongoing Project

5. CSR EXPENDITURE BUDGETED

- 5.1 In the beginning of every financial year, the CSR Committee shall determine whether the provisions of Section 135 of the Act for mandatory CSR spend are applicable to the Company and accordingly, determine the CSR Expenditure Budgeted for the financial year and recommend the same for Board approval.
- 5.2 CSR Expenditure Budgeted shall include all expenditure including contribution to corpus or on projects/programmes relating to the CSR Activities. For achieving the CSR objectives through implementation of meaningful and sustainable CSR programmes, the Company shall allocate the following as its annual CSR Expenditure Budgeted:
 - (i) 2% of its average net profits made during the three immediately preceding financial years, as prescribed under the Act and the CSR Rules from time to time;
 - (ii) Any income arising there from;
 - (iii) Surplus arising out of CSR Activities; and
 - (iv) Such other amount as may be determined by the Company from time to time
- 5.3 Any surplus arising out of CSR Activities shall not form part of the business profits of the Company and the same shall be spent on CSR activities.
- 5.4 Likewise, any excess amount spent on CSR activities may be set off against CSR expenditure to be incurred in the succeeding financial years in accordance with the applicable CSR Provisions.
- 5.5 Unspent amount, if any, on the CSR Activities shall be dealt with in accordance with the provisions of Section 135 of the Act and CSR Rules framed thereunder.

6. MONITORING AND REPORTING

- 6.1 The CSR Committee shall monitor all CSR Activities, including utilization of funds to ensure their effective implementation in accordance with the CSR Rules read with Section 135 of the Act.

- 6.2 The progress of CSR programmes under implementation will be reported to the CSR Committee at half yearly intervals.
- 6.3 Broadly, the following procedure will be adopted by the CSR Committee for implementing and monitoring the CSR Activities:
- a. **The CSR Annual Action Plan**
 - o The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act,
 - o the manner of execution of such projects or programmes,
 - o the modalities of utilisation of funds and implementation schedules for the projects or programmes,
 - o monitoring and reporting mechanism for the projects or programmes and
 - o Details of need and impact assessment, if any, for the projects undertaken by the company.
 - b. Monthly review of each CSR Project based on indicators by CSR Head of the Company
 - c. Quarterly review of the CSR Projects by CEO of the Company, based on
 - o Budget vs actual expenditure
 - o Target vs Achievement
 - d. Half yearly review by CSR Committee and Board members
- 6.4 The minutes of the meetings of the CSR Committee shall be placed before the Board.
- 6.5 The Company may conduct impact assessment on a periodic basis, either on its own or through an independent professional or professional institutions, especially on the flagship programmes.
- 6.6 The CSR Committee may be directed by the Board to present the cost incurred on CSR Activities annually and also the impact assessment thereof as appropriate.

7. DISCLOSURE / REPORTING

- 7.1 The CSR Policy shall be displayed on the Company's website www.jubilantindustries.com.
- 7.2 An annual report on the Corporate Social Responsibility shall form part of the Board's report.

8. REVIEW / AMENDMENT

The Board may amend, abrogate, modify or revise any or all clauses of this Policy, on recommendation of the CSR Committee and in accordance with the Act and the CSR Rules.

In case any provision(s) of this policy is contrary to or inconsistent with the provisions of the Act, Rules framed thereunder and CSR Rules etc. ("Statutory Provisions"), the Statutory Provisions shall prevail. Further, amendments in the Statutory Provisions shall be binding even if not incorporated in this Policy.

9. APPROVAL OF CSR POLICY AND IMPLEMENTATION

The CSR Policy has been approved by the Board on June 18, 2021, on recommendation of the CSR Committee and is effective from April 1, 2021.

CSR Annual Action Plan

Key Projects of CSR FY 2022-23							
S.No.	CSR Programmes	Category Under Schedule VII	Implementation Modality	Implementation Schedule			
				Q1	Q2	Q3	Q4
Health							
1	Swasthya Prahri Project	I	Jubilant Bhartia Foundation	✓	✓	✓	✓
2	JBF Medical Centre	I		✓	✓	✓	✓
3	Mobile Dispensary	I		✓	✓	✓	✓
4	COVID Relief	I		✓	✓	✓	✓
Promotion of Education							
1	Project Muskaan to improve learning level	II	Jubilant Bhartia Foundation	✓	✓	✓	✓
2	e-Muskaan(Digitization)	II		✓	✓	✓	✓
4	Khushiyoon Ki Pathshala (Life Skill Improvement)	II		✓	✓	✓	✓
5	Infra Support	II		✓	✓	✓	✓
Livelihood							
1	Nayee Disha(Vocational Training)	II	Jubilant Bhartia Foundation	✓	✓	✓	✓
2	Samridhhi (SHG Support)	II		✓	✓	✓	✓
3	Jubi Farm (Agro based activities)	II		✓	✓	✓	✓
Rural Development							
1	Rural Infra Support	X	Jubilant Bhartia Foundation	✓	✓	✓	✓
2	Jan Sanchetna	X		✓	✓	✓	✓

1. While Jubilant Industries Limited has no liability of CSR for this financial year, Jubilant Bhartia Foundation will continue its activities with the help of other donor companies as per the Implementation Schedule.
2. Monitoring and reporting of the CSR projects shall be undertaken as per the process mentioned in Clause 6.3 of the CSR Policy.
3. Since the overall limit of CSR expenditure is less than Rs. 10 Crore, Impact Assessment by an external agency is not applicable. The Company shall conduct internal assessment of the CSR Projects to understand the impact based on SROI (Social Return on investment) principal.

CSR ACTIVITIES AND BUDGET FOR FY 2022-23

1	2	3	4	5		6	7	8	
Sr.	Name of the Project	Item from the list of activities in Schedule VII to the Act	Local area or other (Yes/No)	Location of the Project		Amount Budget for the project (in Rs Lakhs)	Mode of implementation Direct (Yes/No)	Mode of Implementation - Through Implementing Agency	
				State	District			Name	CSR Registration number
1	Health (Arogya, Swasthya Prahari)	Eradicating hunger, poverty and malnutrition; promoting health care and sanitation and making available safe drinking water	Yes	Rajasthan	Chittor garh	Nil	No	Jubilant Bhartia Foundati on	CSR00001657
2	Education(Muskaan)	Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly and the differently able persons and livelihood enhancement projects	Yes	-do-	-do-	Nil	No	-do-	CSR00001657
3	Livelihood (Nayee Disha, Samridhhi)	-do-	Yes	-do-	-do-	Nil	No	-do-	CSR00001657
4	Rural Developm ent	Local Area Development	Yes	-do-	-do-	Nil		-do-	CSR00001657
		Total				Nil			

JUBILANT INDUSTRIES LIMITED
**COMPOSITION OF SUSTAINABILITY AND CORPORATE SOCIAL
RESPONSIBILITY COMMITTEE**

Sr. No.	Name of Director	Designation
1.	Mr. Priyavrat Bhartia	Chairman
2.	Mr. Shamit Bhartia	Member
3.	Mr. Ravinder Pal Sharma (Refer Note 1)	Member
4.	Mr. Manu Ahuja	Member

Note:

1. *Inducted as a member of the Committee effective from September 3, 2020.*
2. *Mr. Ramanathan Bupathy ceased to be the member of the Committee effective from September 3, 2020*