

CORDS CABLE INDUSTRIES LIMITED

Corporate Social Responsibility (CSR) Policy

PHILOSOPHY/ OUR VISION

Corporate Social Responsibility (CSR) can be defined as a Company's sense of responsibility towards the community and environment (both ecological and social) in which it operates. Companies can fulfil this responsibility through waste and pollution reduction processes, by contributing educational and social programs, by being environmentally friendly and by undertaking activities of similar nature.

In Cords Cable Industries Limited (Cords), CSR is not a charity or mere donations. CSR is a way of conducting business, through which a company achieves a balance of economic, environmental and social imperatives, while at the same time addressing the expectations of shareholders and other stakeholders.

The practice of CSR is not new to companies in India. It has been observed that for Indian Companies, Corporate Social Responsibility (CSR) is the commitment of businesses to contribute to sustainable economic development by working with the employees, their families, the local community, experts and the society at large to improve lives in ways that are good for business and for its development.

In compliance with the provisions of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, Cords Cable Industries Limited, has been carrying on various CSR activities and had taken steps to ensure improvement and betterment for the benefit of the society at large and particularly in and around the areas where its works are located.

APPLICABILITY OF THE POLICY

1. The Company's CSR Policy has been developed in conformity with the provisions of Section 135 of the Companies Act, 2013 (referred to as the Act in this Policy) and in accordance with the CSR Rules (hereby referred to as the Rules) notified by the Ministry of Corporate Affairs, Government of India. Further this Policy is revised to conform with the amendments in the Act and the Rules.
2. This Policy shall apply to all CSR initiatives and activities taken up at the various locations in India, preferably in the vicinity where the Company carries out its business operations and for the benefits of different segments of the society, specifically the deprived and under- privileged.

AIM OF THE CSR POLICY

This Policy which has been amended to incorporate the provisions of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, aims to support various activities for betterment of the environment and living conditions of the population directly or through recognized agencies / funds. Such activities will cover one or more of the CSR activities laid down in Schedule VII of the Companies Act, 2013 as revised from time to time.

The Policy means a statement containing the approach and direction given by the Board of the Company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

COMPOSITION:

In compliance with Section 135 of the Companies Act, 2013 and the relevant Rules, a CSR Committee of the Board comprises as under:

Mr. Naveen Sawhney
Mr. Prem Kumar Vohra
Mr. Parveen Kumar
Mr. Rahul Mohnot

MEETINGS:

The Committee shall hold meeting as and when required, to discuss various issues on implementation of the CSR Policy of the Company. The members would thrive to hold at least two meetings in a financial year. The Committee shall periodically review the implementation of the CSR Programmes and issue necessary direction from time to time to ensure orderly and efficient execution of the CSR programmes in accordance with this Policy. It would be the responsibility of the CSR Committee to periodically keep the Board apprised of the status of the implementation of CSR activities.

ROLE OF CSR COMMITTEE:

- a. To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013 (as amended from time to time).
- b. To recommend the amount of expenditure to be incurred on the activities in a financial year.
- c. To monitor the Corporate Social Responsibility Policy of the company from time to time.
- d. Any other matter/thing as may be considered expedient by the Members of the Committee in furtherance of and to comply with the CSR Policy of the Company.

RESPONSIBILITIES OF THE BOARD:

The Board shall:

- Form a CSR Committee and disclose the composition of the CSR Committee.
- Approve the CSR Policy after taking into account the recommendations made by the CSR Committee.
- Place the CSR Policy on the Company's website.
- Ensure implementation of the activities under CSR.
- Ensure expenditure of requisite amount on CSR every year as per law.
- Disclose reasons for not spending the amount (if applicable) in the Annual Report to the Shareholders of the Company.
- Ensure that the administrative overheads are not more than 5% of the total CSR Expenditure.
- Ensure that the funds so disbursed have been utilized for the purposes and in the manner as approved by Board / CSR Committee and the Chief Financial Officer shall certify to the effect.
- Approve transfer of unspent CSR Amount in accordance with the law. The Accounts and Finance Team of BIL shall prepare the statement of spent and unspent CSR amounts and shall assist and facilitate for transfer of the same.

CSR Projects and Programmes

The Company shall ensure that in identifying its CSR Projects, preference shall be given to the local area and areas around which the Company (including its Units) operates. However, this shall not bar the Company from pursuing its CSR objectives in other areas, as prescribed under Schedule VII of the Act and the amendments thereto.

The Company may undertake any one or more of the following activities, as mentioned in Schedule VII of the Companies Act, 2013 and the amendments thereto, as may be recommended by the CSR Committee of the Board and approved by the Board of Directors from time to time depending on the resources and opportunities available:

- i. Eradicating hunger, poverty and malnutrition, promoting health care, including preventive health care, and sanitation including contribution to the Swach 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 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, agroforestry, conservation of natural resources and maintaining quality of soil, air and water 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 building viand sites of historical importance and work of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- vi. Measures for the benefit of armed forces veterans, war widows and their dependents; Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- vii. Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- viii. Contribution to the Prime Minister's National Relief Fund 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 Scheduled Castes, the Scheduled 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, Siddhaand 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
- xi. slum area development.
Explanation- For the purposes of this item, the term “slum area’ shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.
- xii. disaster management, including relief, rehabilitation and reconstruction activities.
- xiii. Any other activities, which may be included in Schedule VII from time to time.

However, it is made abundantly clear that the following activities will not be considered as CSR activities:

- i. activities undertaken in pursuance of normal course of business of the Company
- ii. any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level:
- iii. contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- iv. activities benefitting employees of the Company as defined in clause (k) of 2 of the Code on Wages, 2019 (29 of 2019);
- v. activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services;
- vi. activities carried out for fulfilment of any other statutory obligations under any law in force in India;

Illustrative list of PROGRAMMES/PROJECTS that may be undertaken:

- i. Eradicating hunger, poverty and malnutrition, promoting health care, including preventive health care, and sanitation including contribution to the Swach 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 differently abled and livelihood enhancement projects;
- iii. 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- iv. Contribution to the Prime Minister's National Relief Fund 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 Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- v. Disaster Relief projects including for pandemic(s) through various Initiatives related to support to the frontline workers like medical workers, police, administrative staff, etc through various donation drives.
- vi. Disaster relief & rehabilitation initiatives – support to communities affected by the same.
- vii. Donation and Support programs for society or any part thereof.
- viii. Any other programme as per the requirement as and when deemed fit.

IDENTIFICATION / SELECTION OF PROGRAMMES

The programmes would be identified as per the requirement in the community etc. Professional agencies may be engaged in conducting need based assessment in some programmes, wherever required.

IMPLEMENTATION

Projects will be undertaken either by the Company itself or through a trust or a company formed by the Company for this purpose or in partnership with recognized NGOs, trusts or other accredited agencies registered with the Central Government having a valid CSR Registration Number.

CRITERIA FOR IDENTIFYING EXECUTING PARTNERS

In case of programme execution by NGOs/Voluntary organizations the following minimum criteria should be required to be ensured:

1. The NGO / Agency must have a permanent office / address in India.
2. The NGO should be a registered public Trust or a Society having a duly executed Trust Deed / Memorandum of Association.
3. It should have registration Certificates under Section 12A, Section 80G, etc. of the Income Tax Act, 1961, and other applicable registrations.
4. It should have a Permanent Account Number (PAN).
5. Last 3 years audited statement of accounts.
6. Last 3 years income tax return.
7. The antecedents of the NGO / Agency are verifiable / subject to confirmation.
8. Should have a team of professional expertise and system to maintain Books of Accounts and to generate necessary Reports on the supported programmes.
9. Brief background / Profile of the NGO / Agency.
10. No tie-up with the Competition of CORDS.

Provided that in case of any amendment in the Act / the Rules specifying any criteria for implementing agencies, the same shall be applicable in addition to the above criteria (to the extent applicable).

Provided also that the CSR Committee may waive one or more of the above criteria on case to case basis.

Review Periodicity and amendment

- i. CSR Plan may be revised/modified/amended by the CSR Committee at such intervals as it may deem fit.
- ii. The CSR Committee shall review the Policy every two years unless such revision is necessitated earlier.

CSR Expenditure

- i. Every year the Company shall spend the amount equivalent to at least 2% of its average net profits (calculated as per Section 198 of the Act) made during the three immediately preceding financial years towards CSR activities.
- ii. The administrative overheads i.e. the expenses incurred by the Company for general management and administration' of Corporate Social Responsibility functions in the Company, shall not exceed five percent (5%) of total CSR expenditure of the Company for the financial year. However, it shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.

- iii. Any surplus arising out of the CSR activities will not form part of the business profit of a Company and will be ploughed back into the same project or will be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII of the Companies Act, 2013, within a period of six months of the expiry of the financial year.
- iv. Any amount spent in excess of the mandatory requirement in any financial year, will be adjusted within immediate succeeding three financial years subject to conditions that:
 - a. The excess amount available for set off shall not include the surplus arising out of CSR activities.
 - b. The Board of the Company shall pass a resolution to this effect.
- v. If CSR amount is spent by the company for creation or acquisition of a capital asset, it shall be held by: Section 8 company or beneficiaries of said CSR project in form of self-help groups, collectives, entities or a public authority.
- vi. In case the Company fails to spend the statutory minimum limit of 2% of Company's average net profits of the immediately preceding three years, in any given financial year, the unspent amount, relating to a project, other than ongoing project, shall be transferred to any fund included in Schedule VII of the Act (until a fund is specified in Schedule VII of the Act) within a period of six months from the expiry of the financial year and Board shall specify the reasons for the same in its report in terms of clause (o) of sub-section {3} of section 134.

The unspent amount relating to ongoing project shall be transferred within a period of thirty days from the end of the financial year to a special account which will be opened by the Company in that behalf in that financial year in any scheduled bank to be called 'Unspent Corporate Social Responsibility Account and such amount will be spent by the Company in pursuance of its obligation towards the CSR Policy within a period of three financial years from the date of such transfer, failing which the Company will transfer the same to a fund specified in Schedule VII within a period of thirty days from the date of completion of third financial year.

The disbursement of funds shall be submitted to the Board as a part of the review along with the details of how the funds have been utilized, which shall be certified by the Company's CFO. In case of an ongoing project, the implementation along with the approved timelines and year-wise allocation will be presented to the Company's Board.

Annual Action Plan

The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following:

- (a) the list of CSR projects or programmes that are approved to be undertaken in areas:
- (b) the manner of execution of such projects or programmes
- (c) the modalities of utilization of funds and implementation schedules for the projects or programmes;
- (d) monitoring and reporting mechanism for the projects or programmes;
- (e) details of need and impact assessment, if required, for the projects undertaken by the Company:

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

Monitoring/ Evaluation Mechanism and Assessment

The CSR Committee shall institute a transparent monitoring mechanism for implementation of the CSR projects or programmes or activities undertaken by the Company which shall include the following:

- i. A programme indicating the areas in which funds are to be spent during the year and a time schedule will be placed before the CSR Committee for consideration and recommendation to the Board of Directors.
- ii. The Company shall ensure that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer will certify to the effect annually.
- iii. The Company will further monitor the implementation of the ongoing projects 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 within the overall permissible time period.

CSR Reporting

Impact assessment, if and when mandated, will be undertaken by an independent agency and such impact assessment report shall be placed before the Board and annexed to the annual report of CSR.

Dissemination of Information

The Composition of the CSR Committee, the CSR Policy and Projects, if any, approved by the Board of the Company shall be placed on the Company's website viz. www.cordscable.com.

A detailed status report on the CSR activities carried out by the Company shall be disclosed every year as a part of the Boards' Report in the Annual Report in the prescribed format.

The CSR Committee will also make a Responsibility Statement stating that the CSR Policy implementation and monitoring thereof is in letter and spirit, in compliance with the CSR objectives of the Company.

The Company's CSR Policy conforms to the Corporate Social Responsibility as stipulated under the Companies Act, 2013 and Rules framed thereunder. This Policy is subject to review by the CSR Committee / Board of Directors, as and when the need arises or is required.

Transfer of unspent CSR amount

The unspent CSR amount, if any, shall be transferred by the Company to any fund included in schedule VII of the Act (until a fund is specified in Schedule VII of the Act)

GENERAL

- a) In the event of any conflict between the provisions of this Policy and of the Act or SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other statutory enactments, rules, the provisions of such Act or SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or statutory enactments, rules shall prevail over and automatically be applicable to this Policy and the relevant provisions of the Policy would be amended/ modified in due course to make it consistent with the law.

- b) In case of any doubt with regard to any provisions of the Policy and difficulties, the interpretation and decision of CSR Committee and the Board of Directors of the Company will be final.
- c) Any or all the provisions of the CSR Policy would be subject to the revision/ amendment in accordance with the guidelines on the subject as may be issued from Government from time to time.
- d) The Company reserves the right to modify, cancel, add or amend any of these Rules of the Policy.

CONTACT PERSONNEL

For queries related to CSR projects/ programme or activities, please write to us at: csc@cordscable.com.

AMENDMENTS

This Policy can be modified or repealed at any time by the Board of Directors taking into consideration the recommendation of CSR Committee of the Company. The Company Secretary & Compliance Officer is being authorized to amend this Policy to appropriately incorporate statutory amendments relating to Corporate Social Responsibility from time to time. Such amended policy shall be placed before the CSR Committee and the Board of Directors of the Company for information and noting.

For CORDS CABLE INDUSTRIES LIMITED

NAVEEN SAWHNEY
Managing Director
