

ALP NISHIKAWA COMPANY PRIVATE LIMITED

Registered Office: Khasra No. 173/2/2/1, GF, Village: Bijwasan, Near Oberoi Farm, New Delhi-110061

Corp. Off. : Plot No. 32, Sector-18 (HUDA), Gurgaon-122015, Haryana

ANCO CORPORATE SOCIAL RESPONSIBILITY POLICY



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1. INTRODUCTION

The Ministry of Corporate Affairs, Government of India has recently notified the Section 135 of the Companies Act, 2013 along with Companies (Corporate Social Responsibility Policy) Rules, 2014 "hereinafter CSR Rules" and other notifications related thereto which makes it mandatory (with effect from 1st April, 2014) for certain companies who fulfill the criteria as mentioned under Sub Section 1 of Section 135 to comply with the provisions relevant to Corporate Social Responsibility.

The CSR Policy of ANCO has been evolved on the basis of CSR guidelines issued by the Ministry of Corporate Affairs, New Delhi.

The term "Corporate Social Responsibility (CSR)" can be referred as corporate initiative to assess and take responsibility for the company's effects on the environment and impact on social welfare. At ANCO, Corporate Social Responsibility (CSR) is based on the belief that business sustainability is closely connected to the sustainable development of the communities that the business is a part of and the environment in which the business operates.

2. DEFINITIONS

In this Policy unless the context otherwise requires:

- a) "Act" means the Companies Act, 2013;
- b) "Annexure" means the Annexure appended to these rules;
- c) "Corporate Social Responsibility (CSR)" means and includes but is not limited to
 - (i) Projects or programs relating to activities specified in Schedule VII to the Act or
 - (ii) Projects or programs relating to activities undertaken by the board of directors of a company (Board) in pursuance of recommendations of the CSR Committee of the Board as per declared CSR Policy of the company subject to the condition that such policy will cover subjects enumerated in Schedule VII of the Act.
- d) "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act
- e) "CSR Policy" relates to the activities to be undertaken by the company as specified in Schedule VII to the Act and the expenditure thereon, excluding activities undertaken in pursuance of normal course of business of a company.

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- f) "Net profit" means the net profit of a company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely :-
- (i) Any profit arising from any overseas branch or branches of the company' whether operated as a separate company or otherwise;
 - (ii) Any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act:
- Provided that net profit in respect of a financial year for which the relevant financial.
- g) Words and expressions used and not defined in these rules but defined in the Act shall have the same meanings respectively assigned to them in the Act.

3. ANCO's Corporate Social Responsibility Policy

Objectives of CSR Policy:

- a) The objective of the CSR Policy is to help enrich the quality of life of the community of the nearby areas of Plants.
- b) Create a positive impact by making sustainable developments in the society and promote good environmental practices.
- c) To be responsible and responsive corporate citizen through endeavors to create a safe, harmonious and ecologically balanced environment for its members and the community at large.
- d) To maintain commitment to quality, health and safety in every aspect of the business and people.
- e) To promote equality of opportunity and diversity of workforce through its business operations.

ANCO recognizes that its business activities have wide impact on the societies in which it operates, and therefore an effective practice is required giving due consideration to the interests of its stakeholders including shareholders, customers, employees, suppliers, business partners, local communities and other organizations. The company endeavors to make CSR a key business process for sustainable development. ANCO is responsible to continuously enhance shareholders wealth; it is also committed to its other stakeholders to conduct its business in an accountable manner that creates a sustained positive impact on society. Our company is committed towards aligning with nature; and has adopted eco-friendly practices.

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4. ANCO's Commitment

We understand that commitment to CSR is critical to achieve sustainable business growth. We strictly adhere to the various environmental and pollution laws applicable to a business unit in Rubber Industries. We follow a well-structured social well-being policy for the society and our employees.

Whilst being committed to excellence and total customer satisfaction through team work and timely delivery of quality products of international standards, we recognize our responsibilities towards social and environmental dimensions of our business and thus aim to visibly play a leading role within our spheres of influence.

To meet this commitment ANCO will respect the rule of law, local communities and societies at large and it will make conscious efforts to enhance the quality of life through its CSR programmes.

5. ANCO CSR Fundamentals:

- Conduct its operations with high standards of ethics, fairness and transparency. Utmost importance would be provided to high esteems of human rights and corporate ethics which encompass diverse cultures, morals, ethics and legal systems.
- Put forth employment practices of equal opportunities for all castes, religions, nationalities and gender etc.
- Achieve the best possible safe operating procedures and conditions; company has adopted a strict policy towards Safety, Health and Environment (SHE).
- Believe in collaborative working towards sustainable development, growing business in a socially and environmentally responsible way.
- Develop strong commitments throughout the organisation to serve the community and come forward towards the cause of the weak stratum of the society.
- Actively taking role and responsibility in empowering local communities.
- A High Powered Board level CSR committee to oversee and advise the CSR operations in the group companies.
- Regular board level reporting to CSR Committee.

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6. ANCO's CSR programme

The focus of CSR programme will be broadly in the areas of education, health care, sustainable livelihood, community development, infrastructure development and espousing social causes.

ANCO focuses on Health, Education and Livelihoods as the thrust areas for social development by extending a helping hand to the needy and the underprivileged.

Education:

ANCO's initiatives in this field aim at promoting quality education in backward areas and encouraging higher education.

Health:

The health initiatives aim at creating awareness and improving health standards of the rural poor through providing facilities and reaching quality health care in the areas of general medicine, eye care, dental care, etc.

Livelihood:

ANCO aims at lending a helping hand to people by providing means of livelihood and empowerment through vocational training and entrepreneurial development.

Apart from the above thrust areas, ANCO strives to serve the society through various other measures like providing drinking water, laying roads, construction of drains, conducting sports & competitions, distribution of clothes and relief materials, etc. and other need based initiatives in compliance with Schedule VII of the Companies Act, 2013.

7. ANCO's CSR Implementation Process

ANCO's Board of Directors have formed a Board level CSR Committee. This committee will be responsible for the decision making with respect to ANCO CSR policy. CSR Committee recommended the policy to ANCO's Board of Directors and the Board of Directors have approved this policy.

The CSR advisory committee constituted by Board of Directors, which consists of at least three Directors and such other officers of ANCO as authorised by the Board of Directors. The role of the committee shall be to periodically monitor the specific CSR activities. The CSR Committee to meet at least twice a year to review the implementation of CSR projects/ programme and give suitable direction.

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We will do the CSR activities directly or through Rattan Singh Anand Charitable Trust or other approved CSR specialized agencies. Heads of HR and Legal Department of Office/ Plant has been nominated by Managing Director who will deal with all activities related to CSR.

We involve specialized agencies and community based organizations in order to make a linkage between corporate processes and social processes, the services of agencies which can effectively deliver should be engaged to identify and implement CSR activities. Such agencies could be Community based organizations (CBOs) whether formal or informal, Voluntary Agencies (NGOs), Institutes/ Academic Organizations, Professional consultancy Organizations, etc.

8. Budgets Allocation

The Board of ANCO to ensure that minimum of 2% of average net profit of the last 3 years is spent on CSR initiatives undertaken by ANCO. The CSR budget for a financial year will be created as a percentage of the net profit earned by ANCO in the preceding year. All expenditure towards the programme to be diligently documented. In case at least 2% of average net profit of the last 3 years is not spent in a financial year, reasons for the same to be specified in the Director report and, unless the unspent amount relates to any ongoing project transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

The surplus from the allocated CSR budget will not be utilized for business or form part of business profits.

The CSR programmes will be planned according to the budget allocation. In exceptional circumstances percentage of budget allocation may be varied with the approval of the CSR Committee.

9. Information Dissemination

The information dissemination would be through Company's website and through Annual Report. For queries related to CSR projects/programmes/activities, please write to us at: cs@anbros.com.

10. Organisational Mechanism and Responsibilities

The CSR Committee and CSR Team member monitors successful and time bound implementation of the Projects at various manufacturing facilities of the Company and measures the impact of the work done.

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Subject to CSR provisions, all administrative expenses including expenditure on wages & salaries, tours and travels, training & development of personnel deputed on CSR activities would be borne from CSR funds.

The CSR Team shall take decision on sanctioning works/allocation of funds for CSR and appointing authorized agencies for implementing Projects/Activities shall be as specified in the delegation of powers approved by the Board.

The Corporate Social Responsibility Policy of the Company conforms to the Corporate Social Responsibility Guidelines (including amendment thereof) issued by the Ministry of Corporate Affairs, Government of India.

11. LIMITATION AND AMENDMENT

The Board of Directors may in their discretion and on recommendation of the CSR committee, make any changes/modifications and/or amendments to this Policy from time to time.

Requirements with respect to quorum, notice of meeting, documentation, etc. shall be in conformity with the applicable Secretarial Standards issued by the Institute of Company Secretaries of India and approved by the Central Government, unless expressly stated otherwise.

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations 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.

Sd/-

MANAGING DIRECTOR
