

Corporate Social Responsibility Policy



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PREAMBLE

Vimal Intertrade Private Limited ("**Company**") is committed to conduct its business with highest standards of business ethics and in accordance with applicable laws, rules and regulations ensuring full and accurate disclosures.

The Company believes in conduct of the affairs of its constituents in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour.

Vimal, headquartered in Mumbai, is a market leader in distribution of chemicals & related services in India.

Vimal is a preferred partner of customers and suppliers in our key markets. We measure our success by our ability to fulfil customers' orders with highest degree of efficiency and reliability.

Representing major MNCs, our market focussed sales & technical teams offer solutions to customers' problems utilizing our comprehensive and complementary product portfolio. We cater diverse end-use industries such as coatings, adhesives, construction chemicals, wire & cable, leather, packaging, personal care, pharmaceuticals, food, water treatment, textiles, paper and related industries.

The Company's Corporate Social Responsibility ("**CSR**") Policy encompasses the philosophy for delineating its responsibility as a social corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the underprivileged group of Urban and Rural community.



OUR RESPONSIBILITIES

A) Towards

our communities:



We will involve communities surrounding our operations to bring about a positive change in their lives through holistic, sustainable and integrated development.

B) Towards

our customers:



We will build gainful partnerships with the customers to understand their needs and provide right product and service solutions. We will adopt and actively encourage the best and fair business practices and shall endeavour to build solid bonds with them.

C) Towards

our Business Partners:



We will support our suppliers to cultivate ethical and fair business practices and give preference over other to those who demonstrate this.

D) As a

Corporate Citizen



We reaffirm our commitment to conduct our business with environmental accountability. We will endeavour to adopt environment-friendly technologies and energy efficiency in our operations while continuously monitoring and reducing emissions.

E) Responsibilities

towards our Employees



We will foster a work culture with high ethical principles and standards and encourage our employees to perform with total integrity, commitment and ownership. We will do all we can to support their professional growth and recognise high achievers.



GOVERNANCE

This CSR policy has been developed in accordance with [Section 135 of the Companies Act, 2013 \("Act"\)](#) and in accordance with the [Companies \(Corporate Social Responsibility Policy\) Rules, 2014 \("Rules"\)](#) and subsequent amendments as notified by the Ministry of Corporate Affairs, Government of India.

This Policy shall apply to all CSR projects/programmes/activities undertaken by the Company in India as per Schedule VII of the Act, more specifically described under Serial no. 9 of this policy.

POLICY STATEMENT

The CSR Policy focuses on addressing critical social, environmental and economic needs of the marginalized /underprivileged sections of the society. Through this policy, we align our CSR strategy with the goals. We adopt an approach that integrates the solutions to these problems into the strategies of the company to benefit the communities at large and create social and environmental impact.



PURPOSE

The key purpose of this policy is to:

Define what CSR means to us and the approach adopted to achieve our goals;

Define the kind of projects that will come under the ambit of CSR;

Identify broad areas in which the company will undertake projects;

Serve as a guiding document to help execute and monitor CSR projects;

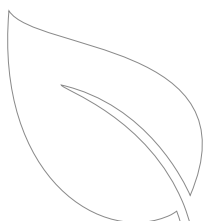
Explain the manner in which the surpluses from CSR projects will be treated.

OBJECTIVES

For the Company, CSR not only means Corporate Social Responsibility but also Corporate Social Relationships. It is the Company's commitment to bring an overall positive impact towards sustainable development of the society at large.

In line with this statement the Company's CSR Objectives are:

- To enhance value creation in the society through the Company's CSR initiatives and projects;
- To develop sustainable projects through responsible business practices and good governance;
- To design a process for and ensure an increased commitment at all levels in the organization towards social responsibility; and
- To involve its stakeholders and create a support in the process of social transformation.



SCOPE OF ACTIVITIES

As a practice, we classify only those projects that are over and above our normal course of business as CSR. This policy applies to all our CSR projects and it will be further reviewed and updated.



EXCLUSIONS FROM CSR

The following activities shall not form part of the CSR activities of the Company:

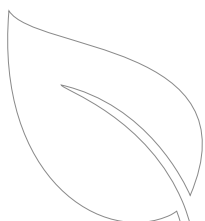
- ✗ The activities undertaken in pursuance of normal course of business of the company
- ✗ CSR projects/programs or activities that benefit the employees of the Company and their families
- ✗ Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes;
- ✗ Any CSR projects/programs or activities undertaken outside Indias



ACTIVITIES

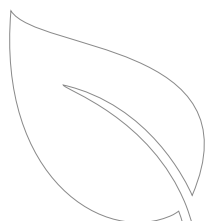
The CSR activities of the Company will be carried on multiple lines, which includes:

- (i) Eradicating hunger, poverty and malnutrition, (promoting health care including preventive health care) and sanitation (including contribution to the Swachh 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 the 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 buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art 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 schedule caste, tribes, other backward classes, minorities and women



ACTIVITIES

- (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, Siddha and 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
- (xii) Disaster management, including relief, rehabilitation and reconstruction activities.



GOVERNANCE STRUCTURE

The CSR Governance Structure shall consist of CSR Committee which shall consist of the following members:

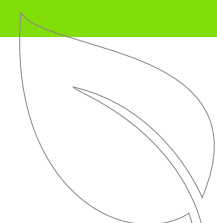
Sr. No.	Name	Designation
1.	Bimal Vasantraï Shah	Managing Director
2.	Mayur Vasantraï Shah	Director
3.	Paras Vasantraï Shah	Director
4.	Hiren Vasantraï Shah	Director

who shall approve the CSR Policy, CSR Budget and assess Projects / Programmes / Activities, in alignment with Section 135 of the Act.

ROLES & RESPONSIBILITIES OF CSR COMMITTEE

The Roles and Responsibilities of the CSR Committee shall consist of the following:

- To draft the CSR policy and recommend the same to the Board of Directors (Board) of the Company for their approval.
- To review and recommend any new CSR initiatives to be taken up by the Company as per the provisions and Rules made under the Companies Act 2013, including the selection/appointment of implementation agencies.
- To review the progress of CSR projects already undertaken by the Company and the utilization of budgets for each of such projects.
- To review and recommend the CSR report to be included in the Board's Report.
- To review and recommend any amendments to be made in the CSR Policy of the Company.
- To carry such other functions as may be delegated to it by the Board relating to CSR activities of the Company.



BUDGET

The CSR Committee shall recommend the annual budgeted expenditure (project wise) to the Board for its consideration and approval. For achieving the CSR Objectives through implementation of meaningful & sustainable CSR Programmes, the Company shall allocate in each financial year 2% of the average net profits made by the Company during the three immediately preceding financial years, as its Annual CSR Budget.

SURPLUS

Surplus arising out of CSR projects or programs, if any, shall not be part of business profits of the Company and the same shall be utilized for CSR activities in accordance with this Policy.

IMPLEMENTATION

The CSR programs or projects under this Policy will be implemented directly by the Company or indirectly through the following implementing agencies:

- a. Through a Registered Trust or a Registered Society or Section 8 Company, whether or not established by the Company or its holding or subsidiary or associate company; or
- b. In collaboration with other companies; or
- c. Combination of one or more of the above.

In case one or more CSR projects or programs are undertaken in collaboration with implementing agencies, clear demarcation with respect to responsibility, contribution, implementation, monitoring etc. of each of such agencies shall be established.

If, the Board decides to undertake its CSR activities through a company established under section 8 of the Act or a registered trust or a registered society, such section 8 company or trust or society shall be registered under Section 12A & 80G of the Income Tax Act, 1961 and shall have an established track record of at least three years in undertaking similar programs or projects or activities.

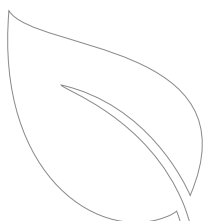


EXECUTION

Company shall identify suitable programmes for implementation in line with its CSR objectives and also benefit the stakeholders and the community for which those programmes are intended.

These programmes would be done through:

- a. Community based organizations whether formal or informal
- b. Voluntary Agencies (NGOs)
- c. Institutes/ Academic Organizations
- d. Trusts, Missions
- e. Self-help Groups
- f. Mahila Mandals/ Samitis
- g. Professional Consultancy Organizations
- h. Corporate with similar CSRVision



MONITORING AND REVIEW

To ensure effective implementation of the CSR programmes undertaken by the Company, a monitoring mechanism will be put in place by the Company. The progress of CSR programmes under implementation will be evaluated and monitored by CSR Committee.

AMENDMENT

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from Government, from time to time. The Board reserves the right to alter in any manner whole or part of this Policy as and when necessary, subject however to the provisions of the Section 135 of the Act and Rules made thereunder.

REPORTING

At the end of each financial year, the CSR Committee shall prepare a CSR Report in the prescribed form relating to the particular financial year and submit the same to the Board of the Company.

