

BHOPAL GLUES AND CHEMICALS PRIVATE LTD

Corporate Social Responsibility (CSR) Policy

(As approved by the Board of Directors on 03rd April, 2014)

A. CSR Policy & Philosophy

BHOPAL GLUES & CHEMICALS PVT LTD is committed to operate and grow its business in a socially responsible way with a vision to be an environmental friendly corporate citizen. Social service, ecological balance and environmental protection & educational upliftment are in our DNA. BGCPL is taking up its first Corporate Social Responsibility (CSR) initiatives this year and will continue to do so in future.

CSR activities at BGCPL reflect its commitment to make things happen at every project we undertake. Our passion in these activities make us more responsible year after year. As a responsible corporate citizen, we try to contribute for possible social, educational and environmental causes on a regular basis. We firmly believe that to succeed, an organization must maintain highest standards of corporate behavior towards its investors, stakeholders, employees and societies in which it operates. Constitution of a Corporate Social Responsibility Committee of the Board and formulation of a Corporate Social Responsibility Policy has become mandatory under the Companies Act, 2013. Accordingly, our Company has formulated this CSR Policy which encompasses its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs.

B. CSR Vision

Improve quality of life for all our communities through integrated and sustainable development in every possible way.

C. Constitution of CSR Committee

In terms of section 135 of the Companies Act, 2013 and the Rules made there under, Board of Directors of the Company at its meeting held on 03rd April, 2014 has constituted a CSR Committee and the following are its members;

Name & Designation

- 1 Mr. Asad Iftakhar - Director
- 2 Mr. Aamir Iftakhar - Director
- 3 Mrs. Gul Iftakhar - Director

The CSR Committee to, inter alia, carry out the following functions;

- 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 and the rules made there under.
- b. To recommend the amount of expenditure to be incurred on the CSR activities.
- c. To monitor the implementation of framework of CSR Policy.
- d. To carry out any other function as mandated by the Board from time to time

and / or enforced by any statutory notification, amendment or modification, as may be applicable, necessary or appropriate for performance of its duties.

D. Definitions

In this Policy, unless the context otherwise requires;

1. "Act" shall mean the Companies Act, 2013 including any modifications, amendments or re-enactment thereof.
2. "Rules" shall mean the Companies (Corporate Social Responsibility) Rules, 2014, including any modifications, amendments or re-enactment thereof.
3. "Financial Year" shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.
4. "Net Profits" shall mean the net profits of the Company as defined under the Act and the Rules based on which a specific percentage for CSR expenditure has to be calculated.
5. "Company" shall mean Bhopal Glues & Chemicals Private Limited.
6. "Agency" or "Agencies" shall mean any Section 8 Company under the Act or a registered trust / society / Non-Government Organisation / Institution performing social services for the benefit of the society at large.
7. "Board" shall mean the Board of Directors of the Company.
8. "Approved Budget" shall mean the total budget as approved by the Board of the Company, which is to be spent or utilized for CSR activities.
9. "CSR Committee" shall mean the Corporate Social Responsibility Committee as constituted by the Board of Directors of the Company in accordance with the Act and the Rules made there under, comprising of three Directors
10. "CSR Officer" shall mean a person engaged by the Company to assist the CSR Committee to implement the CSR activities envisaged under the Policy.
11. "CSR Policy" shall mean the Corporate Social Responsibility Policy of the Company, which covers the yearly activities undertaken by the Company under the policy and the CSR Expenditure thereon.
12. "CSR Activities" shall mean all the Corporate Social Responsibility activities / programs / initiatives of the company, either ongoing or new, including but not limited to green belt / environmental protection & Educational upliftment/ ecological balance / slum rehabilitation / education / sports etc., and those specified in Schedule VII to the Act (as amended from time to time) at corporate office, project offices of the Company, its subsidiaries and associates wherever located, as recommended by the CSR Committee and approved by the Board.

13. "CSR Expenditure" shall mean all CSR expenditure as recommended by the CSR Committee and approved by Board of Directors including the following;

(i) Contribution to the Corpus of a Trust / Society / Section 8 Companies etc., as long as they are created exclusively for undertaking CSR activities or where the corpus is created exclusively for the purpose directly relatable to a subject covered in Schedule VII of the Act.

(ii) Any other contributions covered under Schedule VII to the Act.

E. Thrust Areas

While we strive to undertake all or any suitable activity as specified in Schedule VII to the Act, currently, we focus to support and implement the following activities as our thrust areas;

a. Promoting Aanganwadi (education for poor) in the area close to Factory situated at Pilukhedi

b. Providing contributions to funds setup at national level taking care of education to the underprivileged , supporting socially backward people and helping the differently abled people, Rural Development Projects, promoting gender equality and empowering women.

F. Implementation

This CSR Policy will be implemented from the beginning of this financial year which the Company shows the net profits as per its audited annual financial statements. Based on the net profits, if any, every year, the CSR Committee will identify the CSR activities including the thrust areas, annual budget, planned expenditure and implementation schedule etc.

The CSR activities will be carried out directly or indirectly at the corporate office, in and around the areas of the projects of the Company .

G. Expenditure not covered or recognized

In terms of the Rules, the following contributions shall not be considered as CSR Expenditure;

a. Contributions of any amount, whether directly or indirectly, to any political party or any person associated with a political party.

b. Amount spent, whether directly or indirectly, for the benefit of employees of the Company, its Subsidiaries and Associates and their families.

c. Expenses incurred by the Company for the fulfillment of obligations any act / statute of regulations (such as labour laws, land acquisition act etc.)

d. Expenses incurred by the Company for one off events such as marathons / awards / charitable contribution / advertisement / sponsorships of TV programs etc.

e. Other contributions / expenses not recognized under the Act / Rules as amended or modified, from time to time.

H. Funding and allocation

Following is the mode of funding and allocation of area wise planned expenditure for the CSR activities.

1. The Company shall, in every financial year, contribute a statutory minimum limit of at least 2% of its Net Profits for the CSR Expenditure.
2. In the absence of Net Profits in any financial year, the Company endeavors to spend such feasible amount as it may decide.
3. The Company shall endeavor to spend the entire amount of statutory minimum contribution limit in a financial year. In the event, the Company is unable to spend such amount in any given financial year, the Board shall specify the reasons for the same in its report to the shareholders in terms of Section 134(3)(o) of the Act.
4. The Company has an option to carry forward such un-spent money to next year by depositing it in a separate CSR Fund (Corpus) created by the company or to contribution to the corpus of a Trust / Society / Section 8 Companies etc., as long as they are created exclusively for undertaking CSR activities.

I. Monitoring mechanism

The CSR Officer of the Company will coordinate / review the implementation of CSR activities at various areas and report to the Board through the CSR Committee. The CSR Committee shall meet at least once in a year to monitor the implementation of CSR Plan and its activities. The Committee shall ensure that the CSR Policy, as amended from time to time, is displayed on the company's website.

The CSR Committee shall place before the Board, a draft annual report on CSR activities as per the specified format, in a board meeting to be held in April / May of the following year for Board's review and finalization. the annual report on CSR activities as per the format specified under the Rules.

Professional guidance from the Practicing Company Secretary shall be taken from time to time to assist the CSR Committee and the Board for performing their respective duties under the CSR Policy, any changes by the Government in the regulations governing the CSR activities.

J. Reporting format

Periodic reporting on the CSR activities, execution modalities, implementation schedules etc., to the CSR Committee shall be in the following format which may be amended by the CSR Committee from time to time.

S.No	Area Execution Detail	Budget Amount	Amount Spent	Remarks
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9 OCT 2015



सम्मान-पत्र

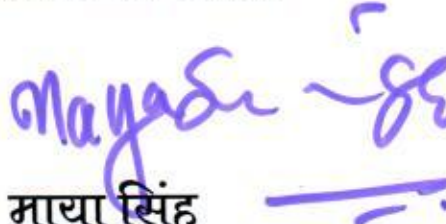
श्रेष्ठ प्रयास
वर्ष 2015-16

भोपाल ग्लूज एंड केमिकल प्राइवेट लिमिटेड

आंगनवाड़ियों में संवरता है नन्हा बचपन,
जो बड़ा होकर बनता है देश का भविष्य।

आपने ग्राम पीलूखेड़ी में आदर्श आंगनवाड़ी भवन
निर्माण की जिम्मेदारी कॉर्पोरेट सोशल रिस्पॉन्सिबिलिटी
के तहत ली है। इस श्रेष्ठ प्रयास के लिए हम आपका
अभिनंदन करते हैं और भविष्य में ऐसे प्रयासों की
निरंतरता बनी रहे ऐसी आशा करते हैं।

शुभकामनाओं सहित।


माया सिंह

मंत्री, महिला एवं बाल विकास
मध्य प्रदेश शासन