

DISA India Limited

Policy on Corporate Social Responsibility (CSR)

Preamble:

DISA India Limited realizes the impact it has among communities in which it operates. With its dedicated approach, the Company has been contributing its time expertise and resources to help local communities in and around the plant locations and the areas in which it operates and may also extend support activities in whole of India on a case-to-case basis.

As a responsible corporate citizen, the Company is committed to continue to focus in the areas of Education, skill development and industry -academia interface, promotion of health care & sanitation & disaster management. The company partners with non-government organizations (NGOs) to make a difference among local communities.

Focus area:

In terms of the CSR rules issued by the MCA the Company will be focusing on undertaking project/programs/activities as listed below, and specified in Schedule VII to the Act excluding activities undertaken in pursuance of the normal course of business of a Company:

- **Education:**
 - a. Providing financial assistance to student in the form of scholarships.
 - b. Providing career counselling for employment enhancing skills,
 - c. Monetary contribution to academic institution for sanitization and infrastructure, teaching-aid primarily in and around the Company's plant locations but may extend to whole of India.
 - d. Providing scholarships to meritorious students in NIFFT.
 - e. Promote STEM (Science, Technology, Engineering & Medicine) education.

- **Promotion of Health care, including preventive Health care & Sanitation.**

- **Disaster Management**

- **Environment Sustainability – Tree plantation preferably in Karnataka but may extend to whole of India**

CSR Committee:

The CSR Committee shall be comprised in accordance with the requirements of the Companies Act, 2013 and the Rules made thereunder. Details of Committee composition is hosted in the Company's website at www.disagroup.com.

(Policy was Amended on November 10, 2022)

Responsibilities of the Committee:

The responsibilities of the CSR Committee include:

Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken, recommending the amount of expenditure for the CSR activities and monitoring CSR activities from time to time.

Implementation:

- The CSR Committee shall from time to time recommend for approval to the Board the CSR activities to be undertaken, the areas to be covered, agencies or NGOs with which projects are to be undertaken, amount to be spent on ongoing and new projects.
- The Company will strive to spend, in every financial year, at least 2 per cent of the average net profits of the company made during the 3 immediately preceding financial years on CSR initiatives.
- The unspent amount, if any, will be dealt in line with the provisions of Companies Act, 2013.
- Surplus arising out of the CSR activities shall never form a part of the business profits of the Company.
- The Board shall satisfy that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or person responsible for financial management shall certify the same.

Monitoring & Review Mechanism:

- The Management will monitor the implementation of the CSR activities and report the progress to the CSR Committee on a six-monthly basis.
- Annual amount spent on CSR Projects will be reported/updated to the CSR Committee.
- The CSR Committee will meet once in a year to monitor the process, progress, impact and outcomes of the various projects undertaken. The CSR committee in turn would keep the Board informed.
- The Company will also obtain a report on the implementation of its CSR projects in the prescribed form under the Companies Act, 2013 and include the same in the Company's Annual Report.

Annual Action Plan:

The CSR Committee shall formulate and recommend an Annual Action Plan every year to the Board, which shall include the following:

- The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- The manner of execution of such projects or program

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- The modalities of utilization of funds and implementation schedules for the projects or programmes;
- Monitoring and reporting mechanism for the projects or programmes;
- Details of need and impact assessment, if any, for the projects undertaken by the Company; and
- Such other details as the CSR Committee or Board may require from time to time.

The Board may alter Annual Action Plan at any time during the financial year, as per the recommendation of CSR Committee, based on the reasonable justification for the change.

Amendment to the Policy:

The Company will continuously review and update its policies and procedures. Any amendment of any provision of this policy must be approved in writing by the Company's Board as per the recommendations of the CSR Committee and promptly disclosed on the Company's website and in applicable regulatory filings pursuant to applicable laws and regulations, together with details about the nature of the amendment.

Sd/-
Managing Director
DISA India Limited

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