

CORPORATE SOCIAL RESPONSIBILITY POLICY

This Corporate Social Responsibility Policy (“the CSR Policy”) has been framed by DairyCraft (India) Private Limited (the Company) in accordance with the Section 135, Schedule VII of the Companies Act, 2013 and CSR Rules issued by the Ministry of Corporate Affairs on February 27, 2014. Unless the context otherwise requires, the definitions mentioned in the notification dated February 27, 2014 and Companies Act 2013, shall apply to this CSR Policy

EMBRACING RESPONSIBILITY:

At **DAIRYCRAFT (INDIA) PRIVATE LIMITED**, we stand as a beacon of responsibility in the realm of cheese manufacturing. With a deep-rooted recognition of our duty to society, the environment, and all stakeholders, we traverse the path of conscientiousness. We understand that weaving ethical, social, and environmental considerations into the fabric of our business operations is not just a choice but an imperative. Thus, our Corporate Social Responsibility (CSR) Policy shines as a testament to our unwavering commitment to sustainable development, community welfare, and environmental stewardship.

REGULATORY INTRODUCTION

In compliance with the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, the Company is, inter alia, required to:

- (i) Constitute a Board Committee to formulate and recommend to the Board a Corporate Social Responsibility (CSR) Policy, recommend the amount of CSR expenditure and monitor the CSR activities of the Company from time to time.
- (ii) Ensure that the Company spends, in every financial year, at least two per cent of the average Net Profits before Tax (PBT) of the Company, made during the three immediately preceding financial years, in pursuance of its CSR Policy.

COMPANY PHILOSOPHY FOR CSR POLICY:

At **DAIRYCRAFT (INDIA) PRIVATE LIMITED**, we perceive Corporate Social Responsibility (CSR) not merely as an obligation, but as an integral part of our identity and purpose. Our philosophy embodies a deep-seated commitment to societal well-being, environmental stewardship, and ethical conduct. We firmly believe that businesses, like ours, have a profound responsibility to contribute positively to the communities we serve and the world we inhabit.

Our CSR philosophy is rooted in the following principles:

1. **Ethical Integrity:** We uphold the highest standards of ethical conduct in all our endeavors, ensuring transparency, honesty, and fairness in every interaction.
2. **Social Impact:** We recognize the power of our actions to effect positive change in society. Therefore, we actively seek opportunities to address social challenges, empower marginalized communities, and promote inclusive growth.
3. **Environmental Consciousness:** We are custodians of the environment and stewards of its resources. With this awareness, we are committed to minimizing our ecological footprint, conserving natural habitats, and promoting sustainable practices throughout our value chain.
4. **Stakeholder Collaboration:** We believe in the strength of partnerships and collaboration. By working closely with stakeholders, including employees, customers, suppliers, and local communities, we aim to co-create meaningful and sustainable solutions that benefit all.
5. **Continuous Improvement:** We embrace a culture of continuous improvement, constantly seeking ways to enhance the effectiveness and impact of our CSR initiatives. Through ongoing learning, innovation, and adaptation, we strive to be at the forefront of responsible business practices.
6. **Accountability and Transparency:** We hold ourselves accountable for the social and environmental consequences of our actions. Therefore, we are committed to transparent reporting, regular monitoring, and rigorous evaluation of our CSR activities, ensuring accountability to all stakeholders.

In essence, our CSR philosophy reflects our unwavering commitment to conducting business with compassion, integrity, and purpose.

FOCUS AREAS

The main responsibilities of the Company towards society at large are to eradicate hunger, poverty and malnutrition; promote preventive health care and sanitation and making available safe drinking water, promoting gender equality and empowering women along with a focus towards preserving and uplifting of the environment we live in by adopting measures to improve the quality of life for people.

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.
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.

OBJECTIVE OF THE CSR POLICY

These objectives serve as a compass, guiding our CSR initiatives towards meaningful impact and positive change. The key objectives of our CSR Policy are:

1. **Sustainable Business Practices:** To ensure that Company operates its business in a manner that is economically, socially, and environmentally sustainable. We strive to integrate responsible practices into our operations, supply chain management, and business strategy, thereby minimizing negative impacts and maximizing positive contributions to society and the environment.
2. **Community Development:** To actively contribute to the well-being and development of the communities in which we operate. We seek to address key societal challenges such as poverty alleviation, education enhancement, healthcare accessibility, and livelihood creation, thereby empowering communities to thrive and prosper.
3. **Stakeholder Engagement:** To foster meaningful engagement with our stakeholders, including employees, customers, suppliers, shareholders, and local communities. We recognize the importance of listening to and understanding the needs, concerns, and expectations of our stakeholders, and strive to incorporate their input into our CSR initiatives and decision-making processes.
4. **Enhanced Quality of Life:** To improve the quality of life of individuals and families residing in the vicinity of our operations. Through targeted CSR interventions, we aim to uplift living standards, enhance access to basic amenities, promote gender equality, and empower marginalized groups, thereby creating a more inclusive and equitable society.
5. **Brand Reputation and Trust:** To strengthen the reputation and trust of Dairy Craft as a responsible corporate. We believe that by demonstrating our commitment to CSR, we can enhance our brand value, build stronger relationships with stakeholders, and foster a positive corporate image both locally and globally.
6. **Compliance and Governance:** To ensure compliance with relevant laws, regulations, and international standards pertaining to CSR. We are committed to upholding the highest standards of corporate governance, transparency, and accountability in our CSR practices, and strive to be a role model for ethical conduct and responsible business behavior within the industry.

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE COMPOSITION:

The Company has constituted a Corporate Social Responsibility Committee (“the Committee”) comprising of the following two Directors:

1. Mr. Harshit Juneja
2. Ms. Isha Juneja

Board of Directors of the Company may re-constitute the Committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The Committee shall exercise powers and perform the functions assigned to it by the Board of Directors of the Company pursuant to section 135 of the Companies Act, 2013 and CSR Rules notified with regard thereto.

MEETINGS:

The Committee shall hold meetings 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 directions 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 of Directors is entrusted with the following responsibilities regarding Corporate Social Responsibility (CSR):

1. **Formation of CSR Committee:** The Board shall establish a CSR Committee and disclose its composition to ensure robust oversight of CSR initiatives.
2. **Approval of CSR Policy:** Upon considering recommendations from the CSR Committee, the Board shall approve the CSR Policy, underscoring its commitment to social responsibility.
3. **Transparency through Website:** The Board shall ensure that the CSR Policy is made available on the Company's website, fostering transparency and accessibility.

4. **Implementation Oversight:** It is incumbent upon the Board to oversee the effective implementation of CSR activities, aligning them with the Company's objectives and societal needs.
5. **Expenditure Compliance:** The Board shall ensure the expenditure of the requisite amount on CSR activities annually, in adherence to legal obligations.
6. **Disclosure of Reasons:** In the event of unspent CSR funds, the Board shall disclose the reasons in the Annual Report, demonstrating accountability to shareholders.
7. **Administrative Oversight:** To uphold efficiency, the Board shall ensure that administrative overheads do not exceed 5% of the total CSR expenditure.
8. **Utilization Certification:** The Board, in conjunction with the CSR Committee, shall verify that disbursed funds are utilized as approved, with certification by the Chief Financial Officer.
9. **Unspent Amount Transfer:** Upon approval, the Board shall authorize the transfer of unspent CSR funds in accordance with legal requirements. The Accounts and Finance Team shall facilitate this process, maintaining transparency and compliance.

CSR PROGRAMMES/PROJECTS

The Company would focus the CSR activities around following thrust areas:

1. Development and Maintenance of Public Parks
2. Education
3. Any other program, which the committee shall deem fit.

IMPLEMENTATION IDENTIFICATION AND SELECTION OF PROGRAMMES

The Company shall implement the identified CSR Projects by the following means:

Direct Method

1. **Internal Implementation:** The Company may undertake the execution of identified CSR Projects itself, aligning with the predefined Thrust Areas outlined in the Policy.
2. **Utilization of Trust/Society/Section 8 Company:** Alternatively, the Company may opt to implement identified Projects through its own Trust, Society, or Section 8 Company dedicated to CSR activities, ensuring alignment with the designated Thrust Areas specified in the Policy.
3. **Engagement of External Professionals/Firms/Agencies:** The CSR Officer may enlist the expertise of external professionals, firms, or agencies, if necessary, to facilitate the implementation of CSR Projects effectively.
4. **Collaboration with Other Companies:** In certain instances, the Company may collaborate with other companies, including its Group Companies, to fulfill its CSR objectives through the Direct method. However, such collaborations will be contingent upon the assurance that the CSR Committees of the respective companies are capable of independently monitoring these CSR Projects.

PARTNERSHIPS TO IMPLEMENT THE PROGRAMMES

Collaborative Partnerships may be formed with the Government Agencies, the village Panchayats, NGOs and other like minded stakeholders. This would help widen the Company's reach and leverage upon the collective expertise, wisdom and experience that these partnerships bring to the table.

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. **Presence in India:** The NGO/Agency must maintain a permanent office/address within India.
2. **Legal Status:** It should be a registered public Trust or Society with a duly executed Trust Deed/Memorandum of Association.
3. **Registrations:** The organization must possess registration certificates under relevant sections of the Companies Act, 2013, Income Tax Act, 1961, including Section 12A and Section 80G. Additionally, registration under the Foreign Contribution Regulation Act (FCRA) is mandatory where applicable, along with any other relevant registrations.
4. **Permanent Account Number (PAN):** A valid PAN issued by the Income Tax Department is required.
5. **Financial Audits:** Submission of audited financial statements for the last three years is mandatory to assess financial stability and accountability.
6. **Income Tax Returns:** The organization should provide income tax returns for the past three years to demonstrate compliance with tax regulations.
7. **FCRA Returns (if applicable):** For organizations registered under FCRA, submission of FC returns for the last three years is necessary.
8. **Verification of Antecedents:** The antecedents of the NGO/Agency must be verifiable and subject to confirmation to ensure credibility and integrity.
9. **Professional Expertise:** The organization should possess a team of professionals with the requisite expertise to manage projects effectively and maintain accurate financial records and program reports.
10. **Non-competition Agreement:** The NGO/Agency should not have any tie-ups with competitors of the Company to prevent conflicts of interest.

CSR ANNUAL ACTION PLAN

To contribute to the enhancement of community well-being and environmental sustainability through the development and maintenance of a public park.

1. Assessment and Planning Phase:

- i. Conduct a thorough assessment of the proposed park location, considering factors such as community needs, environmental impact, and feasibility.
- ii. Engage with local authorities, community leaders, and stakeholders to gather input and ensure alignment with community aspirations.
- iii. Develop a comprehensive plan outlining park design, amenities, landscaping, and maintenance requirements.

2. Infrastructure Development:

- i. Begin construction and development of park infrastructure, including pathways, seating areas, green spaces, playgrounds, and recreational facilities.
- ii. Implement sustainable design practices to minimize environmental impact and maximize resource efficiency.
- iii. Ensure compliance with safety standards and accessibility guidelines to accommodate people of all ages and abilities.

1. Green Initiatives:

- i. Implement measures to conserve water usage through the installation of water-saving fixtures and irrigation systems.
- ii. Establish a waste management system within the park, including recycling bins and composting facilities, to encourage responsible waste disposal practices.

4. Community Engagement and Participation:

- i. Organize community engagement activities to involve local residents in the park's development process, including public consultations, workshops, and volunteer opportunities.
- ii. Foster a sense of belonging and pride among residents by hosting events, cultural activities, and educational programs within the park.

5. Maintenance and Management:

- i. Develop a robust maintenance plan to ensure the park remains clean, safe, and well-maintained over time.
- ii. Implement regular inspections and upkeep of park facilities, including landscaping, infrastructure, and amenities.
- iii. Engage local residents and volunteers in park maintenance activities through organized clean-up events, gardening clubs, and volunteer programs.

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.