

Corporate Social Responsibility Policy

Reviewed and Effective February 12, 2025

Preamble:

Corporate Social Responsibility (CSR) initiatives of Vineet Laboratories Limited go beyond compliance and create sustainable value for communities by improving their health, education, and employability.

This policy encompasses the Company's philosophy towards its CSR and lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large and is titled '**Vineet's CSR Policy.**'

Applicability:

Vineet's CSR Policy including its scope and functioning is formulated as per Section 135 of the Companies Act, 2013 and the Rules made thereunder including the Companies (Corporate Social Responsibility Policy) Rules, 2014.

Vision Statement:

To actively contribute to the community in which we operate and provides high quality solutions to the issues impacting their lives, which results in the overall development of the society.

Mission Statement:

To innovate for our society, deliver high quality services and impactful interventions over a long period of time and ensure sustained relations with the society.

Our Philosophy:

The Company intends to undertake its corporate social responsibility in a strategic manner. while leveraging its strategic, financial, human resources, marketing, research and business skills to create maximum impact for its beneficiaries both internal and external.

Objectives:

The following objectives identified are in accordance with the CSR Vision and Mission. The Company believes that growth of the community should go hand-in-hand with the growth of the Company. Hence, the Company prioritizes to;

- Ensure making decisions based not only on financial or operational factors, but also on the social and environmental consequences

- Uplift the communities around its areas of operation, there by create a positive impact in the community
- Identify interventions to ensure sustainable social development after considering the immediate and long-term socio environmental consequences.
- Setting high standards of quality in providing interventions and support to meet the needs of the community.
- practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders

Purpose:

The key purpose of this Policy is to:

- Outline the development areas in which the Company shall get involved in.
- Define governance structure for CSR management within the Company.
- Serve as a guiding document aiding in identification, execution and monitoring the CSR projects.
- Describe the treatment of surpluses from CSR activities.
- Define the approach and direction given by the Board of the Company, taking into account the recommendations of the CSR Committee
- Provide guiding principles for selection, implementation and monitoring of activities
- Formulate an Annual Action Plan every year as per applicable rules.

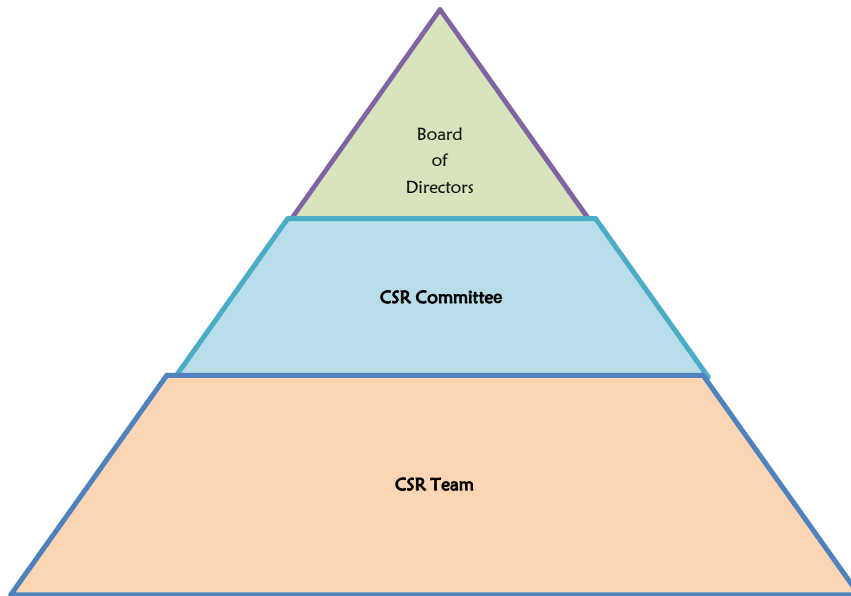
Scope of CSR Policy:

This Policy applies to all CSR projects that will be undertaken by Vineet Laboratories Limited and shall fulfil all the requirements of Section 135 of the Companies Act, 2013 and rules made thereunder. Vineet Laboratories Limited shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act, 2013. This Policy will be periodically reviewed and updated in line with the relevant codes of legislation and best practices that can be adopted by Vineet Laboratories Limited.

Governance structure:

CSR strategy, procedures and commitments should be regularly reviewed. Risks and opportunities in these areas will change and evolve and the business will need to be able to meet these as they emerge.

The Governance structure and its team members are given below –



Each of the above constituents has a specific role to play with clearly defined roles and responsibilities as under -

Board of Directors:

- Approval of the CSR policy, proposed causes and programs to be undertaken by the Company, modalities of operation and the budget for the activities.
- Ensure that activities included by the Company in its Corporate Social Responsibility Policy are related to the activities included in Schedule VII of The Companies Act, 2013
- Ensure that the activities included in Corporate Social Responsibility Policy of the Company are undertaken by the Company
- Ensure that the Company spends, at least two per cent (2%) of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this policy in every financial year.
- The Board's Report issued under clause (o) of sub-section (3) of section 134 shall include an annual report on CSR containing particulars specified in Annexure to the CSR Rules.
- If the Company fails to spend such amount, specify the reasons for not spending the amount in its annual report mentioned above.

CSR Committee:

- Formulating and recommending to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company in areas or subjects, specified in Schedule VII.

- Recommending the amount of expenditure to be incurred on the activities referred above.
- Monitoring the Corporate Social Responsibility Policy of the Company from time to time, ensuring that it is updated for any change or enhancement in scope and the same is recommended to the Board for approval.
- Defining the modalities and monitoring the progress of the activities being undertaken under the policy

CSR Team:

- Be the first point of contact for operating CSR activities including for advice and guidance.
- Provide guidelines and framework for the rest of the organisation to work within.
- Recommend programs, modality of operation and monitoring mechanism.
- Ensure availability of adequate resources
- Support the CSR committee to ensure full compliance of the regulation
- Collecting requests from the community for CSR programs.
- Verifying the authenticity of these requests.
- Assisting Vineet and other partners in implementing the projects.
- Helping all relevant partners to get requisite permissions from the community and the government to implement the CSR activities.
- Engaging the employees in the CSR initiatives.

Implementation:

Implementation of the CSR Programmes will be through Company personnel or through its registered trust / society or through external implementing agencies and the Company may also partner with credible organizations – individually or as consortium- to design, fund, implement and review projects.

CSR Activities:

The Company intends to focus on the below listed areas. However, the list is not exhaustive and the Company may take up any other activity, which is eligible under the provisions of law.

Some of the areas that the Company proposes to invest its CSR budget includes:

Cause	Proposed Program	Items from the list of activities in Schedule VII to the Companies Act, 2013
Health	Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water	Clause (i)
Education & Livelihood	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects	Clause (ii)
Social Support	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	Clause (iii)
Environmental & Water Conservation	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 48[including	Clause (iv)

	contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga	
Disaster management	Disaster management, including relief, rehabilitation and reconstruction activities	Clause (xii)

Resources:

Vineet shall allocate at least 2% of its average net profits made during the 3 immediately preceding financial years calculated as per Section 198 of the Companies Act, 2013, as its Annual CSR Budget in each Financial Year.

From the annual CSR Budget allocation, a provision will be made towards the expenditure to be incurred on identified Areas, for undertaking CSR activities on a year-on-year basis.

Allocation of the Annual Budget for CSR activities in any given year shall be as per the provisions of the Companies Act 2013 and rules made thereof as amended from time to time.

Any unspent/unutilized CSR allocation of a particular year will be carried forward to the next year i.e., the CSR budget will be non-lapsable in nature.

Monitoring plan

A. Monitoring Process

The CSR Team will monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports etc. Mechanisms to track data and monitor projects will be established to ensure the transparency and efficiency of the implementation process. The projects will be evaluated against the milestones defined in the implementation plan of the project.

The Board of the Company shall satisfy itself that the CSR funds disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect as per applicable rules in this regard.

B. Reporting

The CSR Committee of the Board, based on reports presented by the CSR Team, will annually publish report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act 2013 and the rules made thereunder. The CSR Committee shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR Policy is in compliance with the approved CSR Policy of the Company.

C. Impact Assessment

The Company will ensure that baseline statistics are collected before each program is rolled out and data is collected on an on-going basis to track impact. The detailed project plan of each program will also include measuring specific metrics and its comparison with the baseline metrics. All such impact analysis will be reported to the board of directors.

Treatment of CSR Funds:

- CSR Expenditure and Surplus

CSR expenditure will include all expenditure, direct and indirect, incurred by Vineet Laboratories Limited relating to implementation of approved CSR Programmes. Any surplus arising from any CSR Programmes shall be used for CSR activities only and shall not form part of the business profit of the Company. Accordingly, any income arising from CSR Programmes will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure

- Transfer of unspent CSR amount

Until a fund is specified in Schedule VII for the purposes of subsection (5) and (6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act.

- Excess CSR spending

If Vineet spends an amount in excess of the requirements, then the company may set off such excess amount against the requirement to spend under Section 135 (5) up to immediate succeeding three financial years subject to the conditions that are specified under Rule 7(3) of the Companies (Corporate Social Responsibility Policy) Rules, 2014.

Constitution and Meetings of CSR Committee:

CSR Committee of the Board is constituted in terms of Section 135 of the Companies Act, 2013 with three or more directors, out of which at least one director shall be an Independent Director.

The Quorum shall be two-third of its total strength, with the mandatory presence of at least one Independent Director.

The Company Secretary shall act as Secretary to the Committee.

The Committee shall meet at least once in a year.

Display of CSR activities on its website:

The Composition of CSR Committee, CSR Policy and Projects on being approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

Conclusion:

Vineet is committed to undertake and implement the CSR programs in order to bring meaningful and sustainable change to the local communities in which it operates.

The Board of the Company may, subject to compliance with applicable law, at any time alter, amend or modify the CSR Policy as it deems fit to comply with the statutory obligation of the Company to undertake the CSR Activities.