CORPORATE SOCIAL RESPONSIBILITY POLICY
SHIVTEK SPECHEMI INDUSTRIES LTD
POLICY NO :02/REVISION NO :01/2026

1. SHORT TITLE AND APPLICABILITY

1.1 This policy, which encompasses the philosophy of Shivtek Spechemi Industries Ltd("**Company**") for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare and sustainable development of the community at large, is titled as the '**CSR Policy**'.

1.2 This policy shall apply to all corporate social responsibility ("**CSR**") initiatives and activities to be undertaken by the Company.

1.3 This CSR Policy shall operate as the corporate social responsibility policy of the Company for the purposes of Section 135 of the Companies Act, 2013 (Act) and the Rules made thereunder (Rules).

2. DEFINITIONS

2.1 "Administrative overheads" means the expenses incurred by the company for 'general management and administration' of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.

2.2 "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act.

2.3 "Ongoing Project" means a multi-year project undertaken by a Company in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification. Unless the context otherwise mentioned or requires, words or expressions contained in this Policy shall bear the same meaning as in the Act, rules or any statutory modification thereof in force at the date at which these regulations become binding on the company.

3. OBJECTIVES

Shivtek Spechemi Industries ltd CSR Policy intends to:
3.1 Strive for economic development that positively impacts society at large with minimal resource footprint.

3.2 Embrace responsibility for the Company's actions and encourage a positive impact through its activities to alleviate hunger, poverty and malnutrition; to protect the environment; and to support communities, stakeholders and society.

4. CSR PROJECTS / PROGRAMES

4.1 The Company proposes to serve the society by undertaking CSR projects / programs and proactively responding to the needs of the community preferably in the economic proximity of the Company's operations.

4.2 The Company proposes to adopt one or more of the following CSR projects / programmes /activities as prescribed by applicable laws, including Schedule VII of the Companies Act,2013, as amended from time to time:

4.2.1 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;

4.2.2 promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;

4.2.3 Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;

4.2.4 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;

4.2.5 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;

4.2.6 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];

4.2.7 training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports;

4.2.8 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

4.2.9 Contribution to incubators or research and development projects in the field of science, or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and 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 inconducting research in science, technology, engineering and medicine aimed at
promoting Sustainable Development Goals (SDGs)
4.2.10 rural development projects.
4.2.11 slum area development
4.2.12 disaster management, including relief, rehabilitation and reconstruction activities

4.3 The CSR activities shall be undertaken within the territory of the Republic of India.

5. CSR COMMITTEE

5.1 The CSR Committee shall comprise at least of such number of directors as is mandatorily required by applicable laws.

5.2 The CSR Committee of the Company shall comprise of three or more Directors, of which at least one should be an Independent Director (if applicable as per law).

6. ROLES AND RESPONSIBILITIES OF THE CSR COMMITTEE

The CSR Committee shall:
6.1 Formulate and recommend to the Board a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company.

6.2 Recommend the amount of expenditure to be incurred on the activities.

6.3 Monitor the Corporate Social Responsibility Policy of the company from time to time.

6.4 CSR Committee of the Board of Directors will play the role of the apex review body.

6.5 Effective implementation of the CSR Projects, programmes and activities undertaken in terms of this CSR Policy and reporting the same to the Board on a periodical basis.

6.6 The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR Policy, which shall include the following, namely –
• 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 programmes
• the modalities of utilization of funds and implementation schedules for the projects or programme
• monitoring and reporting mechanism for the projects or programmes; and
• details of need and impact assessment, if any, for the projects undertaken by the Company

7. EXECUTION AND IMPLEMENTATION OF CSR ACTIVITIES

7.1 Every year, the Company shall with the approval of its Board of Directors make a budgetary allocation for CSR activities/ projects for the year. The budgetary allocation will be based on the profitability of the Company and the requirements of applicable laws.

7.2 The list of CSR activities which company undertakes shall be as specified under the Act and amendments thereof.

7.3 The Company may enter into partnerships with the government, business partners and communities to create multiplier effect of its social programmes.

7.4 The CSR Committee shall monitor the process of such projects or programmes on a quarterly basis.

7.5 The statutory requirements for spending on CSR initiatives shall be one of the factors while determining the CSR programmes to be undertaken during any Financial Year. The CSR Committee of the Board will allocate funding based on the number of initiatives that are undertaken during the year which meet the requirements of this Policy.

7.6 Company will focus on CSR initiatives that promote the areas identified in this Policy. Company will give preference to the local area and areas around it where it operates. Company will implement the chosen programmes via two channels:

• The mode of implementation of CSR programmes will include a combination of direct implementation and / or through partners such as NGOs, trusts, academic institutions, business associates, registered societies, etc. The Company will select its partners after appropriate due diligence.

7.7 The surplus arising out of the CSR activities or projects shall not form part of the business profit of GFCL and shall be dealt with in a manner as mentioned under the Act.

8. EXECUTING AGENCY

8.1 If in the opinion of the CSR Committee, the implementation of CSR projects requires specialised knowledge and skills, and if the Company does not have such expertise in-house, he wherewithal, and dedicated staff to carry out such activities, the CSR Committee may decide to avail the services of external specialised agencies for the implementation of such CSR projects.

8.2 In the event an external agency is engaged for the purposes of the CSR initiatives of the Company, the Company will need to enter into an agreement with the relevant executing/implementing external agency, setting out the terms and conditions of the engagement of the external agency.

9. GENERAL

9.1 A copy of this CSR Policy will be handed over to the Directors within one month of the date

of the approval of this Policy by the Board of Directors. The Policy shall also be posted on the web-site of the Company and appropriate disclosures shall be made in the Annual Report of the Company as per law.

9.2 In case of any doubt with regard to any provision of this CSR Policy and also in respect of matters not covered herein, a reference should be made to the CSR Committee. In all, the interpretation and decision of the CSR Committee shall be final.

9.3 All provisions of the CSR Policy would be subject to revision/amendment in accordance with the applicable laws.

9.4 The Company reserves the right to modify, cancel, add, or amend this CSR Policy.