

POLICY ON CORPORATE SOCIAL RESPONSIBILT



CORPORATE SOCIAL RESPONSIBILITY POLICY

Corporate Office & Unit I
Symbiotec Pharmed Ltd.
385/2, Pigdamber, Rau, Mhow, Indore
– 453 331, Madhya Pradesh, India
Tel: +91-731-4200052, 6676405,
6676406
Fax: +91-731-4201222
Email: secretarial@symbiotec.com
Website: www.symbiotec.com

Unit II (SEZ) Pithampur
Symbiotec Pharmed Ltd.
Plot No. 5, 6, 7 & 8, SEZ Phase II
Pharmazone, Pithampur,
Dist. Dhar – 454774
Indore (M.P.) India
Tel: +91-7292-256777, 667602/5
Fax: +91-7292-667677

EFFECTIVE DATE:

The Policy shall come into effect on: December 15, 2025

DATE OF LAST AMENDMENT:

The Policy was last amended on: March 31, 2021

Environmental Development of the community in which we operate ensuring participation from the community and thereby create my value for the nation. In doing so we build a better & sustainable way of life for the weaker sections of society and raise the country's human development index.

In this regard, the Company has made this policy which encompasses the Company's philosophy for delineating its responsibility as a Corporate Citizen and lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large and titles as the "Corporate Social Responsibility (CSR) Policy" which is based as per the Companies Act, 2013 and rules made there under.

This policy has been formulated and recommended by the CSR Committee and adopted by the Board of Directors. The Board may, upon recommendation of the CSR Committee, amend or modify this CSR Policy as and when necessary.

DEFINATIONS

- **Act** means Companies Act, 2013, as amended and modified from time to time.
- **Areas of Interest** means the areas of interest as identified by the Company for implementing CSR goals and shall include the areas specified in this CSR Policy and shall include all CSR Activities as defined under the Act and CSR Rules from time to time.
- **Board** means Board of Directors of the Company.
- **Company** means Symbiotec Pharmalab Limited.
- **Corporate Social Responsibility (CSR)** means and includes but is not limited to:
 - (i) Projects or programs relating to activities in areas as specified in Schedule VII to the Companies Act, 2013 and as amended and modified from time to time; or
 - (ii) Projects or programs relating to activities undertaken by the Board of Directors of the Company in pursuance of the recommendation of the CSR Committee and approved by the Board as per this policy.
- **CSR Committee** means Corporate Social Responsibility Committee constituted by the Board pursuant to section 135 of the Companies Act, 2013.
- **CSR Activities** shall mean the specific activities listed in the Annexure and to be performed by Company or by through various Organizations that will be funded by the Company in accordance with the Act and CSR Rules;
- **CSR Commitment** shall mean at least 2% of the average net profits of the Company made during the three immediately preceding financial years as mentioned in Section 135 (5) of the Act for conducting its CSR activities in accordance with the Act and CSR Rules;
- **CSR Policy** means CSR Policy of the Company (Symbiotec Pharmalab Limited);

- **CSR Proposals** shall have the meaning ascribed in the CSR Policy which shall be in accordance with the Act and CSR Rules;
- **CSR Rules** means the Companies (Corporate Social Responsibility) Rules, 2014, as amended and modified from time to time;
- **Funding** shall mean the disbursements that are to be made to an Organization pursuant to this CSR Policy, with the prior approval of the CSR Committee and the Board in accordance with the Act and Rules;
- **Organizations** means Such organizations including NGOs as are permitted to receive Funding in accordance with the Act and CSR Rules;

Words and expressions used in this policy and not defined herein but defined under the Companies Act, 2013 shall have the same meanings respectively assigned to them.

CONSTITUTION, COMPOSITION AND SCOPE OF CORPORATE SOCIAL RESPONSIBILITY COMMITTEE (CSR COMMITTEE)

a) Constitution and composition of the CSR Committee:

The CSR initiatives/activities of the Company will be identified and initiated by the CSR Committee comprising 5 (Five) Members. Subject to the requirements of the Act, the Board may increase or decrease the size of the CSR Committee by passing a resolution.

The members of the CSR Committee shall elect one of them as the Chairman of the Committee. The CSR Committee shall recommend to the Board the amount of expenditure to be incurred by the Company on CSR activities and the Board will ensure that the activities as are included in the CSR Policy are undertaken by the Company subject to and in accordance with the provisions of section 135 of the Companies Act, 2013.

The current members of the CSR Committee are available on website of the Company <https://www.symbiotec.in/>

b) Scope of the CSR Committee:

The CSR Committee has been set up to:-

- Formulate and recommend to the Board CSR Policy which shall indicate the activities to be undertaken by the Company in areas or subject, specified in the Schedule VII to the Act.
- Recommend the amount of expenditure to be incurred on the activities referred to in the CSR Policy.
- Formulation of the Annual Action Plan for CSR activities
- Monitor the CSR Policy from time to time

c) Modalities of execution of the CSR Projects:

The modalities of the execution of the CSR projects or programs and their implementation along with the monitoring process of such projects or programs will be as decided by the CSR Committee.

d) Decisions by the CSR Committee:

- The CSR Committee shall at all the time act in a manner that is consistent with the provisions contained in this CSR Policy, the Act, CSR Rules and amendments from time to time.
- The CSR Committee shall endeavour to arrive at all decisions by a consensus of all Members. However, in the event the CSR Committee is unable to arrive at such a consensus, the Chairman of the Committee may make the final decision.
- All decisions of the Committee shall be ratified by the Board.

e) Meeting of the CSR Committees

- The CSR Committee shall meet as frequently as it determines necessary but at least once annually.
- The CSR Committee shall maintain minutes of each of its meetings.
- The CSR Committee shall review proposed projects and make recommendations to the Board for approval of such projects and allocation of Funding in accordance with the CSR Committee charter.
- The final decision with regards to the acceptance or rejection of a CSR Proposal shall be with the Board.

f) Noting of CSR expenditure

- In case the CSR expenditure is made as per recommendation given by the CSR Committee Members but not taken in CSR Committee Meeting, the Board of Directors shall approve the CSR expenditure to be made, as per recommendations received by CSR Committee Members.
- In the CSR Committee Meeting thereafter, noting shall be taken for the expenditure made.

CORPORATE SOCIAL RESPONSIBILITY ACTIVITIES

The Company shall upon the recommendation of its CSR Committee and with necessary approval of the Board, can undertake any of the following activities, as part of its corporate social responsibility initiatives, in areas and subject specified in Schedule VII of the Companies Act 2013;

(a) Areas of Interest:

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

- 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;
- 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;
- 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;
- measures for the benefit of armed forces veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- 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;
- Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Biotechnology (DBT), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- Rural development projects
- Slum area development.
- Disaster management, including relief, rehabilitation and reconstruction activities.
- The Company would also undertake other need based initiatives in compliance with Schedule VII to the Act.

CSR activities approved by the CSR Committee through a company established under section 8 of the Act or a registered trust or a registered society or through a company established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature as notified by Government time to time.

Provided that, the CSR projects and programs or activities that benefit only the employees of the Company and their relatives shall not be considered as CSR activities.

Also, the CSR activities undertaken in India only will be taken into consideration, in order to satisfy the requirement of section 135 of the Companies Act 2013.

- (b) The Company may update the above list as per Section 135 and Schedule VII of the Act as amended from time to time.

- (c) The Company focuses its philanthropy primarily in geographic regions of India where The Company has a business presence. However, The Company may contribute to causes in other parts of India, if the CSR Committee is of the opinion that such contribution is appropriate.
- (d) The Company will publish the list of specific projects / programs it plans to undertake for any financial year, and the modalities of execution, including implementation plan will be published as an Annexure to this policy from time to time.

IMPLEMENTATION AND RESOURCES FOR THE CSR ACTIVITIES

CSR activities can be implemented in the following manner:

- (a) The CSR activities shall be undertaken by the company, as per its stated CSR Policy, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business.
- (b) The Board of a company may decide to undertake its CSR activities approved by the CSR Committee, through
 - (i) a company established under section 8 of the Act or a registered trust or a registered society, established by the company, either singly or alongwith any other company, or
 - (ii) company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature.
- (c) A company may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that the CSR Committees of respective companies are in a position to report separately on such projects or programs in accordance with these rules.
- (d) Subject to provisions of sub-section (5) of section 135 of the Act, the CSR projects or programs or activities undertaken in India only shall amount to CSR Expenditure.
- (e) The CSR projects or programs or activities that benefit only the employees of the company and their families shall not be considered as CSR activities in accordance with section 135 of the Act.
- (f) Companies may build CSR capacities of their own personnel as well as those of their Implementing agencies through Institutions with established track records of at least three financial years but such expenditure including expenditure on administrative overheads, shall not exceed five percent of total CSR expenditure of the company in one financial year.
- (g) Contribution of any amount directly or indirectly to any political party under section 182 of the Act, shall not be considered as CSR activity.

IDENTIFICATION OF CSR PROPOSALS

The CSR Committee may identify and receive CSR project proposals from an Organization in line with Areas of Interest as set out herein provided:

CSR proposals received from an Organization shall include the following:

- I. information about the Organization and projects that they have undertaken in the past three years;
 - II. Proven track record of the organization for the past 3 (three) years in the area of project activity that it has been nominated for;
 - III. Information of the project and the activities that the Organization proposes to undertake in relation to which Funding is sought from the Company and detailed budget under which expenditure is proposed to be made;
 - IV. The impact of the activities that are proposed to be conducted.
 - V. Any other information that may be material for the Company to make an informed decision on supporting the project along with the completed Funding request.
 - VI. Proof of registration under section 12A and 80G of the Income Tax Act and having a unique CSR Registration Number issued by Central Government.
- Upon receipt of Proposals, the CSR Committee shall conduct appropriate due diligence of the CSR Proposal and the Organization either directly or through external organizations and/ or entities to ensure alignment with this CSR Policy and to ascertain the following:
- I. Relevance of the CSR Proposal to the Areas of Interest.
 - II. Appropriateness of project financials, the budget and timelines.
 - III. Impact on targeted beneficiaries.
 - IV. Is the CSR activity permitted under the Act and Rules.
 - V. Assessing whether the proposal is purely philanthropic;
- Has no direct or indirect benefit to the Company or its employees; has no conflicts of interest or selfdealing exist;
- Has no political or religious affiliation;

❖ Approval Process:

- I. Upon receipt of the CSR proposal, the CSR Committee shall evaluate the same in accordance with this policy.
- II. The CSR Committee may take such time as it deems necessary to deliberate and come to a conclusion regarding a CSR Proposal. The CSR Committee may, approve or decline a CSR Proposal.
- III. All Funding to Organizations must be approved in advance by the CSR Committee and the Board and such approval shall be obtained prior to making any commitment to the Organization in this regard.
- IV. Subsequent to the recommendation of the CSR Proposal by the CSR Committee, the CSR Proposal shall be placed before the Board together with the recommendations of the CSR Committee for its consideration and approval. The Company will provide Funding only to such projects as may be approved by the Board.

❖ **Post Approval Process:**

Subsequent to the approval of the CSR Proposal by the Board, the Company and the Organization shall enter into appropriate documentation regarding the terms of the Funding and the manner in which such Funding shall be disbursed by the Company. Such documentation shall be in a form and substance that is acceptable to the CSR Committee and the Board.

COMPANY APPROACH TO IMPLEMENTATION:

We will strive to implement the aforesaid CSR activities on our own to the extent possible. However, the principle implementer of our CSR activities would include:

- Contribution to various funds which are aligned with our Vision and Mission e.g.
 - Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)
 - Any other fund set up by the Central Government

MONITORING MECHANISM

- I. Organizations receiving Funding will be required to provide evaluation information on a periodic basis with details on the status of the CSR Activities, including details concerning the project deliveries, costs incurred, and in a manner prescribed by The Company.
- II. A summary of these reports shall be tabled before the meetings of the CSR Committee.
- III. Detailed reports will be available for further perusal of the members of the CSR Committee as required.
- IV. The Company reserves the right to suspend payments to an Organization that delays and or fails to provide, to the Company's satisfaction, details concerning the use of the Funding.

REPORTING MECHANISM

The Company shall publish its annual report on CSR Activities in its Directors Report in the manner prescribed under the Companies Act 2013 and the CSR Rules. This policy will also be available on the Company's website.

This CSR Policy is subject to such changes and amendments as may be notified by the Ministry of Corporate Affairs under Section 135 of the Companies Act, 2013 and rules made thereunder and the same shall be read in line with the provisions of the Act applicable to the Company from time to time.

	Name	Designation	Signature	Date
Prepared by				

(Revised Policy)	Salil Jain	Company Secretary Compliance Officer		
Reviewed & approved by	Anil Satwani	Chairperson – CSR Committee		