

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

ORBIT EXPORTS LIMITED

(Amended on August 2, 2023)

Orbit Exports Limited believes in measuring company's performance by its contribution to social, economic and environmental capital. The CSR Policy is formulated in accordance with the provisions of Section 135 of the Companies Act, 2013 ('Act') and Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time ('Rules').

VISION

To actively contribute to social and economic development of the communities in which it operates. It is the Company's intent to establish itself and remain as a responsible corporate entity conscious of its social responsibilities towards its workforce, community and environment.

OBJECTIVE

The main objective of this CSR Policy is to lay down guidelines to make CSR a key business process for sustainable development of the society and the environment in which it operates. It aims in enhancing welfare measures of the society based on the immediate and long term social and environmental consequences of the Company's activities in India.

CONSTITUTION OF CSR COMMITTEE

Pursuant to Section 135 of the Act, the Board of Directors of the Company have constituted a CSR Committee comprising of three members out of which one is an Independent Director. The Chairman of the CSR Committee is an Executive Director. The Board of Directors shall review the constitution at regular intervals and have the authority to reconstitute the CSR Committee and decide the members/chairman's period of office.

CSR EXPENDITURE

In accordance with the Act and Rules, the Company shall ensure that it spends, in every financial year, a minimum of 2% of its average net profits made during the three immediately preceding financial years. The Board of Directors of the Company through its CSR Committee will plan and monitor the expenditure of CSR activities/annual action plan in every financial year in the areas or subject specified

in Schedule VII of the Act and shall ensure that the funds are 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 the same. The activities undertaken in the normal course of business and for the welfare of its employees will not be a part of CSR activities. The surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of a Company.

CSR ACTIVITIES / ANNUAL ACTION PLAN

The Company shall carry out the CSR activities in the areas specified in Schedule VII of the Act as amended from time to time, with the focus areas as under:

- Eradicating hunger, poverty and malnutrition.
- Promotion of healthcare including preventive healthcare.
- Promotion of education including special education and employment-enhancing vocational skills.
- Empowering women and measures for reducing inequalities faced by socially and economically backward groups.
- Ensuring environmental sustainability and animal welfare.
- Any other activities as may be reviewed and included by CSR Committee, from time to time, in accordance with the Act and in consideration of government directives.

RESPONSIBILITIES OF THE COMMITTEE

The responsibilities of the CSR Committee, subject to approval by the Board of Directors shall include the following:

- (a) Decide the activities to be taken up by the Company in accordance with this Policy. To ensure that preference is given to the local area and areas around which the Company operates, for spending the amount on earmarked activities.
- (b) Decide the amount to be spent for each earmarked activity.
- (c) Monitor the progress of the activities initiated under the CSR Policy.
- (d) Monitor and ensure the compliance of the CSR Policy of the Company as approved by the Board of Directors from time to time.
- (e) Submit an annual report to the Board of Directors in the prescribed format on all CSR activities undertaken during the financial year.
- (f) Formulate and recommend to the Board an annual action plan in pursuance of its CSR Policy covering the following aspects as mentioned in the Act and Rules:
 - (i) the list of approved CSR projects or programmes to be undertaken in areas or subjects specified in Schedule VII to the Act;

- (ii) the manner of execution of such projects or programmes as specified in Rules;
- (iii) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- (iv) monitoring and reporting mechanism for the projects or programmes; and
- (v) details of need and impact assessment, if any, for the projects undertaken by the company.

MODE OF IMPLEMENTATION

The Company may undertake CSR activities directly by itself or through the following entities –

- (a) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company; or
- (b) a 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
- (c) any entity established under an Act of Parliament or a State legislature; or
- (d) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

The Company may also collaborate with other companies for undertaking projects or programmes 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 programmes in accordance with the Act and/or Rules.

FREQUENCY OF MEETINGS

The CSR Committee shall meet at such times as it deems appropriate or as may be required under the Act / Rules.

REPORTING

The CSR Committee shall report to the Board of Directors of the Company on all the matters under its scope and responsibilities. The Board's Report forming part of the annual report of the Company shall include an annual report on CSR in prescribed format mentioning all the details of CSR for that particular year.

DISSEMINATION OF INFORMATION

The Composition of the CSR Committee, CSR projects / annual action plan approved by the Board and this Policy shall be disclosed on the website of the Company, for public access.

In case of any inconsistency between the CSR Policy and the provisions of the Act and Rules, the provisions of the Act and Rules shall prevail. Any or all provisions of the CSR Policy would be subject to revision/ amendment by the Board of Directors of the Company based on the recommendations of the CSR Committee or in accordance with the guidelines on the subject as may be issued, from time to time.

For **Orbit Exports Limited**

Sd/-

Pankaj Seth

Chairman
