

DE NORA INDIA LIMITED - CORPORATE SOCIAL RESPONSIBILITY POLICY

INTRODUCTION

De Nora India Limited strives to be a socially responsible Company and strongly believes in development which is beneficial to the society at large. As a corporate citizen receiving various benefits out of society, it is our co- extensive responsibility to pay back in return to the society in terms of helping needy people by providing foods, clothes, etc., keeping the environment clean and safe for the society by adhering to the best industrial practices and adopting best technologies, and so on. It is the Company's intent to make a positive contribution to the society in which company lives and operates.

OBJECTIVE

The objective of the policy is to set guiding principles for carrying out CSR activities by the Company and also to set up the process of execution, implementation and monitoring of the CSR activities to be undertaken by the Company.

FOCUS AREAS

In accordance with the requirements under the Companies Act 2013, De Nora CSR activities, amongst others, will focus on:

1. **EDUCATION:** Promoting education, including special education and employment-enhancing vocational skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects.
2. **HUNGER, POVERTY, MALNUTRITION AND HEALTH:** Eradicating hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.
3. **RURAL DEVELOPMENT PROJECTS:** Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.
4. **GENDER EQUALITY AND EMPOWERMENT OF WOMEN:** Promoting gender equality and empowering women, setting up old age homes, hostels and day care centers

for women and orphans and such other facilities for Senior Citizens, and adopting measures for reducing inequalities faced by socially and economically backward groups.

5. NATIONAL HERITAGE ART AND CULTURE: Ensuring protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art, setting up public libraries, promoting and developing traditional arts and handicrafts.
6. ENVIRONMENTAL SUSTAINABILITY: 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.
7. CONTRIBUTIONS TO FUNDS: contributions to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes other Backward Classes, Minorities and Women. Contributions/Funds to technology incubators located within academic institutions which are approved by the Central Government.
8. PROMOTION OF SPORTS: Contribution towards promotion of rural sports, nationally recognized sports, Paralympic sports and Olympic Sports
9. RURAL DEVELOPMENT: Contribution towards rural development projects
10. OTHERS: measures for the benefit of the armed forces veterans, war widows and their dependents. Any other activities in relation to the above and all other activities which form part of CSR as per Schedule VII of the Companies Act, 2013 as amended from time to time and the rules made thereunder.

Note: The scope of the items mentioned in the list above is illustrative in nature.

QUANTUM OF AMMOUNT TO BE SPENT ON CSR ACTIVITIES

The company shall strive to spend in every financial year at least 2% (Two percent) of the average net profits of the Company made during the three immediately preceding financial years.

Any surplus arising and/ or traditional revenue generated out of CSR activities undertaken by the Company shall not form part of the business profit of the company and same shall be spent for undertaking any CSR activities.

LOCATION OF CSR ACTIVITIES

The CSR Committee will decide on the location of the CSR activity and in such selection preference shall be given to local areas where the company's registered office is located.

IMPLEMENTATION OF CSR ACTIVITIES

1. The Company may also undertake CSR activities through a registered trust or society or any Company, established by the Company, its holding or subsidiary Company under section 8 of the Act for such not-for-profit objective or such other entity/organization as approved by the CSR Committee.
Provided the Company can carry out the CSR Activities through such other institutes having an established track record of 3 (three) years in undertaking the CSR activities.
2. The Company may collaborate with other companies for undertaking the CSR Activities subject to fulfillment of separate reporting requirements as prescribed in the Companies (Corporate Social Responsibility) Rules, 2014 (the "**Rules**").
3. The CSR Activities shall not include any activity undertaken by the Company in pursuance of the normal course of business of the Company.
4. The Company shall not make any payment directly or indirectly to political party (ies) for CSR Activities.

PROCEDURE FOR CSR ACTIVITIES

1. The Committee shall recommend the Board suitable CSR Activities to be undertaken during the financial year along with the detailed plan, modalities of execution, implementation schedule, monitoring process and amount to be incurred on such activities,
2. The Board shall give its approval based on the recommendation of the Committee and in compliance of this policy,
3. The Committee, after approval, shall collaborate with the stakeholders and the De Nora Representatives to monitor the status of each project and will submit a periodic report giving status of the CSR Activities undertaking, expenditure incurred and such other details may be required by the Board.

COMPOSITION OF THE CSR COMMITTEE

The CSR committee shall consist of three or more Directors, out of which at least one Director shall be an Independent Director.

The current composition of the CSR Committee is as follows:

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| Mr. M. A. Sundaram | - Chairman/Non-Executive Independent Director |
| Mr. Vinay Chopra | - Executive Director |

Mrs. Sarita D'Souza
Mr. Robert Scannell

-Non Executive Independent Director
-Non Executive Director

ROLE OF THE COMMITTEE

The committee shall carry out the following functions:

1. Formulate and recommend the CSR Policy to the Board of Directors;
2. Identify the Projects to be undertaken by the Company for CSR
3. Recommend to the Board the CSR Activities to be undertaken along with detailed plan, modalities of execution, implementation schedule, monitoring process and amount to be incurred on such activities;
4. Monitor the CSR Policy of the Company from time to time.
5. Ensure compliance of CSR Policy and the provisions of the Companies Act, 2013 and the rules made thereunder;
6. Such other functions as may be delegated and/or assigned by the Board from time to time.

EFFECTIVE DATE

The policy is effective from 31st October 2014.