

## **CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)**

### **OBJECTIVE**

The objective of the policy is to define B&B Triplewall Containers Limited Corporate Social Responsibility (CSR) approach in alignment with Section 135 of the Companies Act, 2013 read with applicable rules. The aim is to make CSR as one of the key focus areas to adhere to B&B's global interest in environment and society that focus on making a positive contribution to society through effective impact and sustainable development programs. The CSR activities to be undertaken by company shall ensure that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities. The following shall be the objective of the company.

- Disseminate information about our activity and the decisions for which the company is responsible in a comprehensive and transparent manner;
- conducting business in a socially responsible, ethical and transparent manner;
- protecting the environment and the safety of all individuals affected by our activities, including our employees, contractors and the public;
- Respect, consider and respond to stakeholders' interests;
- supporting human rights within the Corporation's sphere of influence; and
- engaging, learning from, respecting and supporting the communities and culture with which we work;
- ensuring CSR a part of the B&B's vision, values and practices.
- Pursue the continuous improvement of its own Management System for social responsibility.

### **SCOPE & COVERAGE OF CSR ACTIVITIES:**

The CSR activities of the Company shall include, but not limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 amended from time to time. Further, the Company will review the sectors/activities

from time to time and make additions/ deletions/ clarifications to the above sectors/activities.

## **OUR RESPONSIBILITIES**

### A) Towards our communities

We will involve communities surrounding our operations to bring about a positive change in their lives through holistic, sustainable and integrated development.

### B) Towards our Customers

We will build gainful partnerships with the customers to understand their needs and provide right product and service solutions. We will adopt and actively encourage the best and fair business practices and shall endeavour to build solid bonds with them.

### C) Towards our Business Partners

We will support our suppliers to cultivate ethical and fair business practices and give preference over other to those who demonstrate this.

### D) As a Corporate Citizen

We reaffirm our commitment to conduct our business with environmental accountability. We will endeavour to adopt environment-friendly technologies and energy efficiency in our operations while continuously monitoring and reducing emissions.

### E) Responsibilities toward our Employees

We will foster a work culture with high ethical principles and standards and encourage our employees to perform with total integrity, commitment and ownership. We will do all we can to support their professional growth and recognise high achievers. We will continue to raise the bar of our OH&S standards and guidelines. We recognise that our employees and contractors deserve to work in safe and healthy work environment and will make it our responsibility to ensure zero harm to people.

## **CORPORATE SOCIAL RESPONSIBILITY COMMITTEE**

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR shall be appointed by the Board of Directors of the Company which must consist of at least three or more Directors out of which at least one director shall be an Independent Director.

## **FUNCTIONS & POWERS OF CSR COMMITTEE**

To effectively implement the objectives of the Company with respect to CSR, the Committee is vested with the following functions and powers:

- Formulate CSR Policy and recommend the same to the Board of Directors of the Company for approval
- Recommend CSR activities as stated under Schedule VII of the Act
- Review and report to the Board significant changes to Corporate CSR policies, procedures and practices and provide advice to the Board regarding the methods of communicating CSR and environment, health and safety policies.
- Review the tactical plans regarding integrity programming for the Corporation for the upcoming year.
- Recommend the CSR Budget
- Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules
- The CSR Committee shall institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the company.
- Submit the Reports to the Board in respect of the CSR activities undertaken by the Company
- Review monitor and where significant, report to the Board best practices, trends, new technologies and current emerging public policy issues in CSR matters.

- Monitor activities/charter of Internal Working and Monitoring Group (WG) who are authorized to ensure that the CSR activities of the Company are implemented effectively
- Authorize executives of the Company to attend the CSR Committee Meetings, if necessary

### **MEETINGS OF THE COMMITTEE**

For smooth functioning of the Committee, the members shall meet as below to discuss such matters and to take such decisions as may be necessary;

- A meeting of the Committee may be called by the Chair of the Committee, the Chair of the Board or Director of the Company or by any two (2) members of the Committee.
- the member of the Committee shall elect the Chairperson among themselves
- The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio visual means as may be convenient.
- A quorum for meetings shall be two (2) directors present in person or by telephone or other telecommunications device.
- Reasonable notice, before the meeting, shall be given in writing, by e-mail or by facsimile communication to each member of the Committee, however if all the members of the committee permits, the meeting of the committee shall be called on shorter notice.
- The members of the Committee may mutually agree between them regarding time and place for the said meetings.

### **CSR ALLOCATION & EXPENDITURES**

The Companies Act, 2013 prescribes that the companies which meet the criteria specified U/s. Sec. 135 shall allocate atleast 2% of the average net profits (calculated as per Sec. 198) during the three immediately preceding financial years to be spent on CSR Activities that fall under the categories specified under Schedule VII of the Act.

CSR expenditure shall include all expenditure including contribution to corpus, for projects CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the areas or subjects, specified in Schedule VII of the Act.

#### **FAILURE TO SPEND THE CSR MONEY**

If the Company fails to spend the required amount in a particular financial year, it is the duty of the Committee to submit a report in writing to the Board of Directors specifying the reasons for not spending the amount, which in turn shall be reported by the Board of Directors in their Board Report forming part of Annual Report pertaining to that particular Financial Year and transfer such fund according to MCA notification to any fund mentioned in schedule VII of Companies Act, 2013 within the period of 180 days from the closing of particular Financial year.

Surplus, if any, arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company and same shall be utilised for the CSR activity only.

#### **MONITORING & REPORTING**

The CSR Committee will be responsible for the monitoring CSR activities and report to the Board from time to time. The CSR Committee has the powers to:

- Seek monitoring and implementation report from the Organisations receiving funds.
- Delegate a designated company official to co-ordinate with the Organisation receiving funds to inspect the activities undertaken and ensure information in a timely manner.

#### **MEASUREMENT OF CSR PERFORMANCE**

The Committee shall ensure maintaining high quality standards on CSR reporting. In order to meet this goal, committee will institutionalise a transparent measurement system. This will help to measure Company's performance against the set key performance indicators (KPIs) and best practices. The measurement process will also help set out future action plans.

#### **DISCLOSURES AND REPORTING**



The Annual Report of the Company include a section on CSR outlining the CSR Policy, CSR committee, CSR initiatives undertaken by Company, the CSR spend during the financial year and other information as required by the prevailing law. Reporting will constitute an integral part of CSR initiatives, as we at B&B, remain committed to being transparent and accountable to our stakeholders. The objective of reporting is not only to update our stakeholders, but also to receive their feedback, and incorporate their suggestions into our future CSR strategies. As per the CSR Rules, the contents of the CSR Policy shall be included in the Directors' Report and the same shall be displayed on the Company's website.

#### **AMENDMENTS TO THE POLICY**

The Board of Directors on its own and/or as per the recommendations of the CSR committee can amend this policy, as and when deemed fit. Any or all provisions of this CSR policy are subject to the applicable provisions of the Companies Act, 2013 and any subsequent amendments thereof from time to time.

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