

CREATIVE GRAPHICS SOLUTIONS
INDIA LIMITED

CIN: U22219DL2014PLC263964

CORPORATE SOCIAL
RESPONSIBILITY POLICY
(CSR POLICY)

Corporate Social Responsibility Policy (CSR Policy)

This CSR Policy has been framed by **Creative Graphics Solutions India Limited** (the Company) in accordance with Section 135, Schedule VII of the Companies Act, 2013, and CSR Rules issued by the Ministry of Corporate Affairs on February 27, 2014. Unless the context otherwise requires, the definitions mentioned in the notification dated February 27, 2014, and the Companies Act 2013, shall apply to this CSR Policy.

- **Company Philosophy for CSR Policy:**

Companies Act, 2013 has formally introduced Corporate Social Responsibility to the Indian Companies. Government of India has given a separate section for CSR along with the legal recognitions to their community development approach.

- **Creative Graphics Solutions India Limited (GCSIL)** is much positive and appreciates the decision taken by the Government of India. The legal framework of CSR is an edge to corporate Charitable/Reformative approach towards the society around operations.

The management of the Company expresses its willingness and support for the CSR concept, and its legal framework and shall abide by it.

- **Corporate Social Responsibility Committee:**

The Company has constituted a Corporate Social Responsibility Committee (“the Committee”) comprising of following,

Name of the Director	Designation in the Committee	Nature of Directorship
Mr. Gaurav Arora	Chairman	Non-Executive Director
Mr. Nikhil Rungta	Member	Non-Executive Independent Director
Mr. Puneet Sharma	Member	Non-Executive Independent Director

The Board of Directors of the Company may re-constitute the Committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, and notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The Committee shall exercise powers and perform the functions assigned to it by the Board of Directors of the Company pursuant to section 135 of the Companies Act, 2013 and CSR Rules notified with regard thereto.

- **The responsibilities of the CSR Committee include the following:**

1. To formulate CSR strategy, policy, and goals.
2. To monitor the CSR policy and performance.
3. To review the CSR projects/initiatives including the amount of expenditure from time to time.
4. To formulate and recommend to the Board for its approval, an annual action plan every financial year as per the recommended format of MCA and will review from time to time.
5. To ensure legal and regulatory compliance as per CSR guidelines.
6. To ensure reporting and communication to stakeholders on CSR projects/initiatives.

- **CSR Activities:**

Pursuant to Schedule VII of the Companies Act, 2013, the Committee has approved the following activities as “CSR Activities” to be undertaken under the CSR policy of the Company. The Board of Directors has

reviewed the said activities and expressed its consent to the Committee to pursue the said activities under the CSR policy of the Company under section 135 of the Companies Act, 2014, Schedule VII and other applicable rules, regulations, notifications, etc., issued/ to be issued from time to time.

- **Approved CSR Activities:**

- Projects related to ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources, and maintaining the quality of soil, air, and water.
- Projects, Activities, and Awareness Programs relating to the conservation of natural resources including renewable energy sources, conserving water, minimizing waste generation, and promoting recycling and reuse.
- Sustainable livelihood Projects – Holding hands of all marginalized groups to improve livelihood opportunities, thus improving their quality of life.
- Community Health- Innovative projects to meet special needs. Reaching out with basic health care to all (bridging the gap).
- Environmental Partnerships and Collaborations - Collaboration with non-profit organizations, government agencies, and local communities to undertake joint environmental initiatives.
- Promoting Gender equality and empowerment of women through partnerships.

- **Creative Graphics Solutions India Limited** may, subject to the recommendation of the CSR Committee and approval from the Board of Directors, undertake any other CSR activity as specified in Schedule VII of the Act from time to time.

- **Budget for CSR Activity & CSR Expenses:**

The Company shall allocate the budget for CSR activities. The minimum budgeted amount for a financial year shall be 2% of the average net profit of the three immediately preceding financial years. The Company may allocate more fund/ amount than the amount prescribed under section 135 of the Companies Act, 2013, for the CSR activities for any financial year. The Committee shall calculate the total fund for the CSR activities and recommend them to the Board for approval. The Board shall approve the total fund to be utilized for CSR activity for the respective financial year.

CSR expenditure shall include all expenditures including contributions to the corpus for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities which fall within the approved CSR activities.

- **Identification of activities/ projects:**

Out of approved CSR activities, the Committee shall decide which activity/ project should be given priority for the respective financial year. While arriving at the decision of the activity to be undertaken for the respective year, the Committee shall analyze the basic need of the community/ area in which the Organization operates or at the place where its registered office is situated. The Committee shall record its findings and prioritize the CSR activities.

- **Implementation process:**

After prioritizing the activity, the Committee shall finalize the detailed implementation project/program, including planning for expenses against the total budget allocated for CSR activities.

- **Implementing Agencies:**

The approved CSR activities, projects and program shall be carried out directly or in any of the following ways as the Board on the recommendation of the CSR Committee in its absolute discretion may decide:

- A company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company.
- 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 any entity established under an Act of Parliament or a State legislature.
- 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 has an established track record of at least three years in undertaking similar activities.
- The above-referred agencies shall have the unique CSR Registration Number.

The Company may also undertake CSR projects or activities in collaboration with other corporate. The implementing organization will also be screened, based on the CGSIL screening criteria to ascertain the organization's credibility and its ability to execute the project with utmost effectiveness.

- **Organizational Responsibility:**

At the organizational level for the implementation of the agreed CSR activity, the committee may constitute an implementation team or authorize any of the departments of the Company to organize the implementation of the CSR activity. The team or respective department shall monitor the implementation process from time to time, on behalf of the CSR committee and place a report to the Committee regarding the progress of the activity implementation, on a quarterly basis. The respective department or implementation team would be responsible for reporting any irregularity to the Committee on an immediate basis.

- **Monitoring by the Board:**

The Board of Directors shall constantly monitor the implementation of the CSR activities. The CSR committee shall place a progress report, including details of expenses, before the Board quarterly. The Board shall review the same and suggest recommendations, if any, to the committee about the implementation process.

- **Monitoring of CSR projects:**

All CSR Projects/Activities shall be monitored directly by the Board and the CSR Committee through the CSR Team.

- a. Projects directly implemented by CSR Team:**

- The CSR Projects taken up by the Company or through other organizations shall be monitored directly by CSR Department. Objectives, implementation plans, key deliverables, and desired impact will be spelt out at the start of the project.
- In case the progress of CSR Projects is not as per the defined milestones, the project will be evaluated by the CSR committee. If the CSR Committee finds that the project is not sustainable or needs modification, it will send its recommendation to the Board for necessary approval with reasonable justification.

b. Projects in collaboration with Implementing Agencies:

- CSR Projects taken up through approved implementing agencies shall be evaluated and monitored jointly by the CSR department and respective organizations. An evaluation format shall be prepared for this purpose at the start of the project clearly stating the time, cost, and deliverables/desired impact.
- In case the progress of CSR Projects is not as per the defined milestones, the project will be evaluated by the CSR committee. If the CSR Committee finds that the project is not sustainable or needs modification, it will send its recommendation to the Board for necessary approval with reasonable justification.

In the case of “ongoing projects or programs” yearly implementation, monitoring, and evaluation plan shall be fixed and approved by the Board on the recommendation of the CSR Committee and periodic reports shall be shared with the Board.

At the end of every financial year, the CSR Committee shall submit to the Board requisite information and documents to report the progress of implementation of the CSR projects or programs approved by the Board. Further, the Chief Financial Officer of the Company shall also submit a certificate to the Board certifying that the funds disbursed for CSR projects or activities have been utilized for the said purpose.

- **Compliance and Reporting to Board:**

The Committee is responsible to undertake CSR activities as per the approved CSR Policy. Apart from quarterly reporting to the Board about the implementation of CSR activity, a detailed report containing the implementation schedule, the total budget allocated, actual expenses incurred, surplus arising, if any, the result achieved, further work to do in the concern CSR activity, Recommendation for the CSR activities for next year, etc. should be placed before the Board for its consideration. Any surplus arising out of the fund allocated for CSR activity shall not be part of the business profit of the Company.

- **Management Commitment:**

The Board of Directors, Management, and all of the employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

Our Corporate Social Responsibility policy conforms to the relevant section of the Corporate Social Responsibility, Rules made under the Companies Act, 2013 and amendment(s) to be made thereto in the future.
