



**POLICY ON CORPORATE SOCIAL RESPONSIBILITY
(CSR)
OF
BASIL PROMPT VINYL PRIVATE LIMITED**

Real progress occurs when privileges are balanced with the responsibilities towards society. Your Company has always laid emphasis on progress with a social commitment. The Company strongly believes in the philosophy of giving back to the community and serving the community and society in which the Company operates. We believe strongly in our core values of empowerment and betterment of not only the employees but also our communities. Following this principle, the company has developed a comprehensive approach towards promoting and facilitating various aspects of our surrounding communities, work-force and their families. The CSR Policy sets out the fact that the commitment of the Company's Activities extends beyond its business and profits and its endeavor to benefit all its stakeholders at large.

Basil "SILVIN" is always serving for improving the quality of lives of its employees and also for society. Additionally, all the CSR projects will be in line with the CSR vision, as well as areas listed in Schedule VII of the Companies Act, 2013.

(1) Need for the CSR Policy:

This policy is framed in accordance with the applicable provisions of the Section 135 of the Act and the Rules (as defined below).

Ministry of Corporate Affairs, Government of India has notified Section 135 being provision relating to CSR with effect from 1st April, 2014 and also notified relevant Rules namely the Companies (Corporate Social Responsibility Policy) Rules, 2014 which also came into effect from 1st April, 2014. The said provisions are applicable to the Company having:

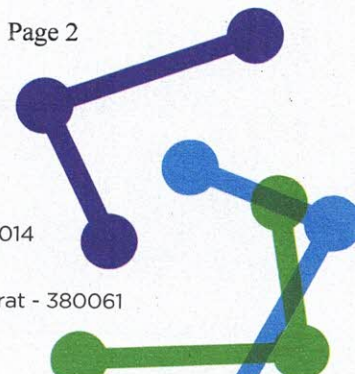
- (a) Net worth of Rs. 500 Crores or more OR
- (b) Turnover of Rs. 1000 Crores or more OR
- (c) Net profit of Rs. 5 Crores or more

Any Company satisfying any one of the above criteria shall ensure that the Company spends, in every financial year at least 2 per cent of the average net profits of the Company made during the three immediately preceding financial years in pursuance of its CSR policy, provided that if the Company fails to spend such amount, the Board shall, in its report made under clause (o) of sub-section (3) of section 134, specify the reasons for not spending the amount.

The Company should give preference to the local area and areas around it where it operates for spending the amount earmarked for CSR activities.

As the Company is fulfilling the criteria of net profit of Rs. 5 Crores or more, as required by the Companies Act, 2013, the Company has formed CSR Policy. The Board of Directors of the Company has approved the policy at their meeting held on 25th October, 2021.

This policy is framed in accordance with the applicable provisions of the Companies Act,

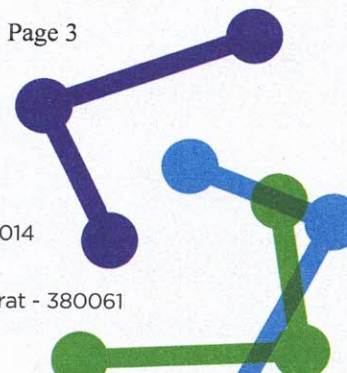


2013 and the Rules framed thereunder (including any statutory modifications or reenactments thereof for time being in force).

(2) Definitions and Interpretations:

In this Policy, unless the context otherwise requires:

1. **“Act”** shall mean the Companies Act, 2013 and the rules made thereunder, including any modification, amendments or re-enactment thereof.
2. **“Administrative overheads”** means the expenses incurred by the Company for ‘general management and administration’ of Corporate Social Responsibility functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.
3. **“Board”** means the Board of Directors of the Company.
4. **“Company”** means BASIL PROMPT VINYL PRIVATE LIMITED.
5. **“CSR”** means corporate social responsibility.
6. **“CSR Committee”** means the corporate social responsibility committee constituted by the Board in terms of Section 135 of the Act and the Rules.
7. **“CSR Expenditure”** means all CSR expenditure of the Company as approved by the Board upon recommendation of the CSR Committee.
8. **“CSR Focus Areas”** means the areas of focus selected from the list of areas specified in Schedule VII of the Act.
9. **“CSR Policy”** shall mean the present Corporate Social Responsibility Policy of the Company, as amended from time to time which covers the activities to be undertaken by the Company as specified in Schedule VII to the Act and the CSR Expenditure thereon.
10. **“CSR Projects”** or **“Projects”** means Corporate Social Responsibility Projects / activities / programs / initiatives instituted in India, either new or ongoing, and include but not limited to those undertaken by the Board in pursuance of recommendations of the CSR Committee as per the declared CSR Policy of the Company.
11. **“Implementing Agency”** means an implementing agency as mentioned in Rule 4 of the Rules (which, in each case, shall be registered with Ministry of Corporate Affairs in accordance with Rules for undertaking CSR activities) and shall include but not



limited to the following:

- (i) In case it is established by the company either singly or jointly with other company, a company established under Section 8 of the Act or a registered public trust or a registered public society established by the company either singly or jointly with other company, and registered under section 12A and 80G of the Income Tax Act, 1961;
 - (ii) In case of agency established by a Third party, it can be through a company established under Section 8 of the Act or a registered public trust or a registered public society and registered under section 12A and 80G of the Income Tax Act, 1961 and should have a track record of at least three years in undertaking similar activities.
12. **“Ongoing Project”** means a multi-year project undertaken by the Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multiyear project but whose duration has been extended beyond one year by the board based on reasonable justification;
 13. **“Financial Year”** shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.
 14. **“Net profit”** shall mean the net profit as per the Act and Rules based on which the specific percentage for CSR Expenditure has to be calculated.
 15. **“Rules”** shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re-enactment, modifications or amendments thereof.
 16. **“Trust”** means a Trust created and registered under the India Trust Act, 1882 or any Trust created and registered with charitable objectives by the Company and includes a Trust jointly created and registered by the Company with all or any of its Group companies.

Words and expression used and not defined in the Policy shall have the same meanings respectively assigned to them in the Act and/or Rules.

(3) CSR Objective:

The objective of the Company’s CSR Policy is to frame guiding principles for identifying, execution and monitoring of CSR activities, its review from time to time, taking necessary corrective actions and reporting of the CSR activities to CSR Committee/Board of Directors. The whole idea is for the betterment of local community, employees and nearby society.

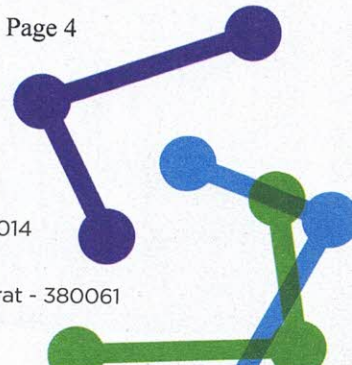
(4) CSR activities:

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Basil Prompt Vinyl Private Limited

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Basil Prompt Vinyl Private Limited is a Private Limited Company, Company is in PVC compounding business for almost three decades. Company is making the whole range of compounds under the brand name of "Silvin" which is the most trusted name in the PVC industry.

All activities are identified in a participatory manner, in consultation with the community of the areas where the Company's operations are carried on, literally sitting with them and gauging their basic needs, based on a discussion with the villagers and other influential persons, thereafter the activities are prioritized. Arising from this, the main focus areas that have emerged are Education, Health care, Sustainable livelihood, Infrastructure development, and espousing social causes.

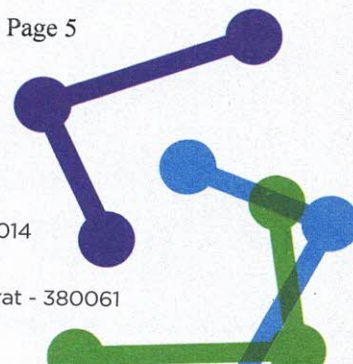
This CSR Policy details chosen areas of focus selected from the list of areas detailed in Schedule VII of the Act. However, these focus areas are an indicative statement of intent, and our CSR Committee/ Board will have the ability to deploy the funds earmarked for the CSR budget in any intervention that they would like irrespective of whether the proposed interventions are covered under our CSR Focus Areas.

Education:

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

Medical, Health Care Facilities & other welfare:

- Provide Medical facilities and medical treatment to the people to different communities who either do not have access to such facilities of health care or they are not able to afford such medical facilities.
- promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups
- Eradicating hunger, poverty and malnutrition, "promoting health care including preventive health care" and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- 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
- 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]

- 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 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;
- rural development projects
- slum area development.
- disaster management, including relief, rehabilitation and reconstruction activities

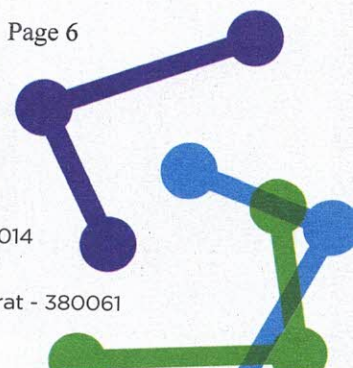
The Company intends to give preference to the local area/s around where it operates. The CSR Committee will decide on the locations for CSR activities to be carried out.

(5) CSR Committee/Board:

The CSR Committee/Board shall be responsible with respect to CSR activities that may be undertaken by the Company in accordance with this CSR Policy as well as the Act and the Rules.

The terms of reference and responsibilities of Corporate Social Responsibility Committee/Board of Directors will be as under:

- To formulate a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company and update the same from time to time;
- To finalize the amount of expenditure to be incurred on the activities referred to in clause (a);
- To monitor the CSR Policy of the company from time to time;
- To prepare a transparent monitoring mechanism for ensuring implementation of the projects / programmes / activities proposed to be undertaken by the Company; to review CSR activities from time to time, undertake necessary corrective actions, if required and reporting of the CSR activities to CSR Committee/Board;
- Explain the manner in which the surpluses from CSR projects will be treated; and
- To place before the board, the draft annual report as per the format in annexure to the



Rules in Board meeting for Board to review and finalization.

The CSR committee/Board may form small group of employees for carrying out CSR related activities under its supervision as and when the need arises.

If required a local man including villagers may also be included as a coordinator or as a link man to achieve the target as well as ensuring participation of local representative in formulating the CSR activities in order to obtain the maximum benefit for the community.

In case of need, close coordination may also be undertaken with NGOs to strengthen the CSR activities. If the CSR Committee/Board is satisfied it may also donate appropriate funds to any NGO or local body if they are operating in line with CSR activities and thereby contributing indirectly for the attainment of desired results in the area of CSR activities.

(6) Allocation of funds (Modalities of utilization of funds):

1. The Company, in every Financial Year, shall endeavor to spend such feasible amount as CSR Expenditure as decided by the CSR Committee/ Board in accordance with this Policy, the Act and the Rules.
2. Total expenditure in the CSR annual action plan shall be approved by the Board.
3. In case the Company fails to spend the statutory minimum limit in any given financial year, the Board shall specify the reason for the same in its report in terms of Section 134(3)(o) of the Act and such shortfall shall be treated as per the provisions of the Act and the Rules, as mentioned below:

Unspent amount not relating to Ongoing Project:

If there is an unspent amount with the Company which was required to be spent under CSR but could not be spent by the Company and which is not pertaining to the ongoing projects then such amount is required to be transferred to the fund specified in Schedule VII of the Companies Act, 2013 within a period of 6 months from the end of relevant financial year.

Unspent amount relating to ongoing Project:

In case there is an unspent amount relating to ongoing project then such unspent amount is required to be transferred within a period of thirty days from the end of relevant financial year to a special account to be opened by the Company with Scheduled commercial bank to be called the Unspent CSR Account (UNCSRA).

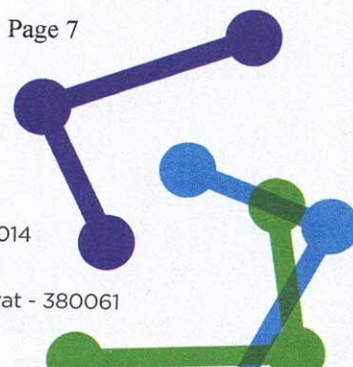
(7) Implementation of the CSR activities:

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The CSR Committee/Board shall formulate, an annual action plan in pursuance of this CSR Policy which shall include the matters set out under the Rules. The Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect. The Company shall ensure that the Administrative Overheads shall not exceed 5% of total CSR Expenditure of the Company for the relevant financial year.

The Company shall implement the identified CSR Projects by the following means:

I. Direct Method

The Company may on its own spent the amount under CSR Projects /activities presently within the scope and ambit as defined in Schedule VII of the Companies Act, 2013 as amended from time to time or in collaboration with other companies / trusts / NGOs undertaking projects/ programs in CSR activities.

The CSR officer may engage external professionalism/firms/agencies if required, for the purpose of implementation of its CSR Projects.

The Company may collaborate with other companies if required, for fulfilling its CSR objects through the Direct Method, provided that the CSR Committees/Board of respective companies are in a position to monitor separately such CSR Projects.

The Company may set up any foundation or body incorporated by the company and eligible to undertake such CSR Projects.

II. Through Implementing Agencies / Indirect Spending:

The Company may spend the amount under CSR projects / activities through any Implementing Agency.

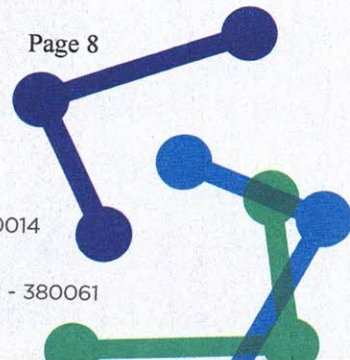
(8) Monitoring and Review of CSR projects/activities:

All CSR activities shall be monitored by the CSR Committee/Board on regular basis. The review discussions shall be held among the CSR Committee members/ Board of Directors and/CSR execution team and other participants for further improvement.

The CSR Committee/Board will review the implementation of the CSR Projects during regular intervals and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Projects in accordance with this CSR Policy.

(9) Disclosure in the Board of Directors' Report:

As required by the provisions of the Act and Rules made there under, contents of the CSR



Policy will be disclosed in the Report of the Board.

(10) Display of CSR activities on its website:

The Board shall disclose the composition of the CSR Committee, this CSR Policy and the Projects approved by the Board on the website of the Company.

(11) Policy documents to be referred for implementation of CSR activities:

- (a) CSR policy of **M/s. BASIL PROMPT VINYL PRIVATE LIMITED.**
- (b) Provisions of the Companies Act, 2013 relating to CSR and rules made there under.
- (c) Any subsequent notification / circular / amendments / modification / revision / addendum to the aforesaid acts and rules issued by the Ministry of Corporate Affairs, Govt. of India.

(12) Surplus out of CSR Activities:

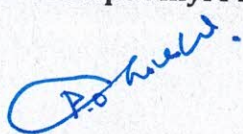
The surplus arising out of the CSR activities, if any, shall not form part of the business profit of the Company and may only be reallocated to the CSR Activities being undertaken in terms of this CSR Policy and shall be spent in accordance with the Rules and this CSR Policy.

(13) General:

- (a) Any amendment of any provision of this CSR Policy must be carried out as per the recommendations of the CSR Committee in due consultation, oversight and guidance of the Board and must be duly approved by the Board. Any subsequent amendment or modification in the Act and/or applicable laws in this regard shall automatically apply to this CSR Policy and shall prevail over anything stated in this CSR Policy from the date of notification of such amendment. Any amendments to this CSR Policy would be disclosed as per applicable laws and regulations.

In case of any doubt with regard to any of the provisions of this CSR Policy and also in respect of any matters not covered therein, the interpretation and decision of the Chairman of the CSR Committee/ Board shall be final.

For, Basil Prompt Vinyl Private Limited



PRADIPKUMAR OCCHAVLAL CHOKSHI
DIN: 06836955
(Director)

