ARUNAYA ORGANICS LIMITED

POLICY ON CORPORATE SOCIAL RESPONSIBILITY (“CSR”)

Preamble:

This policy, which encompasses the Company's philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large.

The aim of the Corporate Social Responsibility Policy (CSR Policy) is to ensure that it becomes a socially responsible Corporate Entity contributing towards improving the quality of life of the Society at large in accordance with the provisions of **Section 135 of the Companies Act, 2013**, read with **Schedule VII** and the **Companies (Corporate Social Responsibility Policy) Rules, 2014**, as amended from time to time.

This policy shall apply to all CSR initiatives and activities undertaken or proposed to be undertaken by the Company, either **directly** or through a company established under **Section 8** of the Companies Act, 2013; or a **registered public trust**; or a **registered society**, duly registered with the Ministry of Corporate Affairs as an eligible CSR implementing agency in accordance with applicable CSR Rules.

The objectives of this Policy are:

- To integrate social, environmental and ethical responsibilities into the Company's business philosophy.
- To undertake sustainable development initiatives in accordance with Schedule VII of the Companies Act, 2013.
- To create long-term value for society while ensuring responsible corporate citizenship.

CSR Activities:

All CSR projects, programmes and activities shall be undertaken in line with the CSR Vision of the Company; and the activities specified under **Schedule VII of the Companies Act, 2013**, as amended from time to time.

The approach of the Company towards CSR will be oriented to identify and formulate projects in response to the need of society and to implement them with full involvement and commitment, execution of projects in a transparent, time-bound and accountable manner; and to take all reasonable steps for fulfillment of projects to be undertaken as a part of CSR activities and to provide all the facilities which are required for the targeted beneficiaries.

CSR initiatives shall necessarily be community oriented, inclusive and equitable in nature, focused on integrated socio-economic development.

CSR activities and programmes shall strictly adhere to the **guidelines, circulars and notifications issued by the Ministry of Corporate Affairs (MCA)** from time to time.

Implementation

The CSR activities shall be undertaken by the company, as per its stated CSR Policy, it will not include projects or programs or activities (either new or ongoing) undertaken in pursuance of its normal course of business, projects exclusively benefitting employees of the Company, or contributions of any amount directly or indirectly to any political party or activities carried out for fulfilment of any other statutory obligations under any law in force in India.

The CSR Activities shall be directly undertaken by the Company itself or may implement through a Company established under Section 8 of the Act or a registered public trust or a registered society as defined under Rule 4(1) of the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended.

All external implementing agencies shall be registered with the Central Government by filing Form CSR 1 and comply with prescribed eligibility conditions including statutory registrations, track record and disclosures.

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

Keeping in line with Section 135 of the Companies Act 2013 and the rules made thereunder, the Corporate Social Responsibility Committee (CSR Committee) of the Company shall be responsible for formulating and recommending to the Board the CSR policy and a CSR annual action plan, provided that the Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on reasonable justification to that effect.

Annual action plan shall include the following, namely:-

(a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
(b) the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
(c) the modalities of utilization of funds and implementation schedules for the projects or programmes;
(d) monitoring and reporting mechanism for the projects or programmes; and
(e) details of need and impact assessment, if any, for the projects undertaken by the company:

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

The CSR Committee reports to the Company's Board of Directors and monitor the implementation of the CSR policy periodically.

CSR projects or programs or activities shall be undertaken in India Only.

Funding and Allocation

For achieving its CSR objectives through implementation of meaningful & sustainable CSR programs/projects/Activities, Company will allocate at least 2% of average Net Profit of the immediately preceding three financial years, or such other amount as may be prescribed under applicable law, as its Annual CSR Budget.

Utilization of Fund

CSR funds shall be utilized strictly for approved CSR projects and programmes in accordance with this Policy and the Annual CSR Action Plan. Any expenditure outside the approved Annual Action Plan shall require prior approval of the CSR Committee and the Board, wherever applicable may be incurred only with prior approval of the CSR Committee. Surplus arising out of CSR projects shall not form part of business profits and shall be re-deployed for CSR activities. Unspent CSR amounts shall be handled strictly in accordance with Section 135(5) and (6) of the Companies Act, 2013 and applicable CSR Rules.

Monitoring and Feedback

The CSR Committee will ensure a transparent monitoring mechanism for ensuring effective implementation of the CSR activities proposed to be undertaken by the Company.

Appropriate documentation of any change in CSR Policy, annual CSR activities conducted, executing agencies, and expenditure entailed shall be undertaken on a regular basis.

CSR initiatives of the Company shall also be reported in the Annual Report of the Company as required by the statutory provisions applicable.

The Company shall conduct impact assessments of CSR projects in accordance with Rule 8(3) of the Companies (CSR Policy) Rules, 2014, through independent agencies, wherever applicable, and shall place the impact assessment reports before the Board and disclose the same in the Annual Report.

The Board shall satisfy itself that the funds so disbursed have been utilized 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 to the effect.

General

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines/Rules on the subject as may be issued by the Government from time to time.

CSR Committee of the Company shall have power to revise/amend the CSR Policy in line with changing needs and aspirations of the target beneficiaries and make the suitable modifications as may be necessary.

The Policy was reviewed by the Board of Directors of the Company at its Meeting held on 30th May, 2026