



**CORPORATE
SOCIAL RESPONSIBILITY
POLICY
OF
BRILLIANT POLYMERS
PRIVATE LIMITED**

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CSR POLICY

In accordance with the provisions of Section 135 of Companies Act, 2013, the Corporate Social Responsibility (CSR) Committee of Brilliant Polymers Private Limited ("the Company") was constituted by the Board of Directors of the Company at their meeting held on 18th March, 2016.

The composition of the said Committee comprises of three Members consisting of Dr. Ravinder Roshanlal Talwar, Mr. Gaurav Ravinder Talwar, and Mrs. Sucheta Talwar.

1. DEFINITIONS:

- 1.1. Corporate Social Responsibility (CSR) means and includes but is not limited to Projects or programs relating to activities specified in Schedule VII to the Companies Act, 2013 ('Act').
- 1.2. CSR Committee means the Corporate Social Responsibility Committee of the Board referred to in Section 135 of the Act.
- 1.3. CSR Policy relates to the activities to be undertaken by the Company as specified in Schedule VII to the Act and the expenditure thereon.
- 1.4. Net Profit means the net profit of the Company as per its financial statement prepared in accordance with applicable provisions of the Act (Section 198), but shall not include the following viz;
 - 1.4.(i) Any profit arising from any overseas branch or branches of the Company, whether operated as a separate Company or otherwise and
 - 1.4. (ii) Any dividend received from other Companies in India, which are covered under and complying with the provisions of Section 135 of the Act.

2. OBJECTIVE

This policy has been formulated in compliance with section 135 of the companies Act, 2013 read with the applicable rules thereto.

3. CSR VISION

The Company's CSR philosophy is 'Do Good to Do Well and Do Well to Do Good'.

The Company has a vision is to be a responsible industry leader and demonstrate environmental, transparent and ethical behavioral practices which will contribute to the economic and sustainable development within the Company, industry, and society at large.

The Company's CSR activities build an important bridge between business operations and social commitment evolving into an integral part of business functions, goals and strategy.

4. SCOPE

This Policy shall apply to all CSR projects / programs /activities undertaken by the Company in India as per but not limited to Schedule VII of the Companies Act 2013.

5. ROLE OF THE CSR COMMITTEE

- To formulate and recommend to the Board, a CSR policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII ;
- To review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the company;
- To monitor the CSR policy of the Company from time to time;
- Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors from time to time.

6. ROLE OF THE BOARD

- After taking into account the recommendations made by the CSR Committee, approve the CSR Policy for the Company.
- Ensure that the CSR activities included in this Corporate Social Responsibility Policy are undertaken by the Company.
- The Board of the Company may decide to undertake its CSR activities approved by the CSR Committee, through a registered trust or a registered society or a Company established under section 8 of the Act by the Company, either singly or along with any other Company or holding or subsidiary or associate Company of such other Company, or otherwise provided that - If such trust, society or Company is not established by the Company, either singly or along with any other Company it shall have an established track record of three years in undertaking similar programs or Projects/activities.
- Ensure that in each financial year the Company spends at least 2% of the average net profits of the Company made during the three immediate preceding financial years, Calculated in accordance with Section 198 of the Act, in pursuance of its CSR policy. Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the Company where it operates,
- As per Section 135 of the Act, specify the reasons for under spending the CSR amount in the Board's Report.

7. CSR ACTIVITIES TO BE UNDERTAKEN:

The CSR Activities that the company will pursue will be in line with our CSR Vision.

The Company would focus on the following CSR activities:

7.1 Promoting Heath Care including Preventing Health Care

7.2 Eradicating hunger, poverty and malnutrition:

- Provision of food, nutrition supplement, cloths etc. for the poor, children and other deprived sections of the society.
- Supporting nutrition in anganwadi centers and building capacities of anganwadi workers to this effect.
- Provision of shelter for homeless.
- Promoting sanitation, making available safe drinking water.

7.3 Ensuring Environmental Sustainability and ecological balance through:

- Plantation drives in schools, Villages and other areas in general.
- Reviving endangered plants, promoting agro-forestry
- Protection of flora and fauna
- Conservation of natural resources
- Maintaining quality of soil, air and water
- Promoting alternate energy resources
- Plastic Waste Management

7.4 Employment and livelihood enhancing vocational skills and projects including skill development/training and any other Life Skill Training and livelihood enhancement projects.

7.5 Promoting Education especially among children, women, elderly and differently abled including:

- Non formal Educational Programs
- Supporting Educational Institutions with infrastructure facilities.

7.6 Promoting gender equality and empowering women including:

- Adult literacy for women.
- Promoting and providing credit support to women's self-help and joint liability groups.
- Setting up old age home and other facilities for senior citizens.
- Setting up of day care centers for kids of working women.

7.7 Rural Development Projects.

- 7.8 Promotion of Sports with special focus on training for rural sport, nationally recognized sports, Paralympic sports, Olympic sports.
- 7.9 Welfare for differently disabled person.
- 7.10 Setting up of Public Libraries.
- 7.11 Protection of national heritage, art, culture and handicraft, restoration of building and sites of historical importance and work of art.
- 7.12 Welfare of armed forces personnel, war widows and their dependents.
- 7.13 Such other activities as the Board may consider appropriate.

8 CSR IMPLEMENTATION:

The CSR activities undertaking by the Company would be implemented through any foundations, trusts or a section 8 Company (or erstwhile Section 25 Company) or any form of entity with track record of at least three years in carrying out activities in related areas.

9 CSR MONITORING AND REPORTING FRAMEWORK:

In compliance with the Act and to ensure funds spent on CSR Activities, a comprehensive Monitoring and Reporting framework has been put in place.

The CSR Committee shall monitor the implementation of the CSR Policy through periodic reviews of the CSR activities.

The respective CSR personnel will present their annual budgets along with the list of approved CSR activities conducted by the Company to the CSR Committee together with the progress made from time to time as a part of the evaluation process under the monitoring mechanism.

10 CSR EXPENDITURE:

The CSR activities undertaken in India only shall amount to CSR Expenditure.

CSR Expenditure shall include all expenditure including contribution to corpus for CSR activities approved by the Board on the recommendation of the CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act.

11 DISCLOSURE OF THE POLICY

The CSR policy recommended by the CSR Committee and approved by the Board shall be displayed on the Company's website and shall be disclosed in the Board's report as well.

12 CSR REPORTING

The Board Report of a Company shall include a report on CSR containing particulars specified in Annexure to the CSR Rules as per the prescribed format.

13 FREQUENCY OF MEETINGS

The meetings of the Committee could be held at such periodic intervals as may be required.

14 QUORUM

The quorum for the CSR Committee Meeting shall be one third of its total strength (any fraction contained in that one third be rounded off as one) or two members, whichever is higher.

15 CHAIRMAN

Dr. Ravinder Roshanlal Talwar shall be the Chairman of the Committee as well as for all meetings and in his absence; the members of the Committee present at the meeting shall choose one amongst them to act as Chairperson.

16 MINUTES OF THE COMMITTEE MEETING

Proceedings of all meetings must be signed by the Chairman of the Committee and tabled at the subsequent Committee meeting.

17 FAILURE TO SPEND THE CSR MONEY

In case the Company fails to spend the targeted amount in the particular financial year, the Committee shall 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 Directors' Report for that particular Financial Year. Surplus arising out of the CSR initiatives shall not form part of the business profits of the Company.

18 PUBLICATION OF THE CSR POLICY

As per the CSR Rules, the contents of the CSR Policy shall be included in the Board Report and the same shall be displayed on the Company's website, if any.

19 POLICY REVIEW & FUTURE AMENDMENT

This policy shall be updated from time to time, by the Company in accordance with the amendments, if any, to the Companies Act, 2013, rules made there under or any other applicable enactment for the time being in force.