JAMMU PIGMENTS LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. INTRODUCTION

Corporate Social Responsibility (CSR) reflects the Company's commitment to conducting its business in an economically, socially and environmentally sustainable manner and to contributing positively to the communities and stakeholders associated with its operations.

Jammu Pigments Limited (the "Company") shall undertake CSR activities in accordance with Section 135 of the Companies Act, 2013, Schedule VII thereto, the Companies (Corporate Social Responsibility Policy) Rules, 2014, and amendments thereto, as applicable from time to time (collectively, the "CSR Framework").

This Policy establishes the principles, governance framework, focus areas, implementation mechanisms, monitoring requirements and reporting framework for the Company's CSR activities.

2. OBJECTIVES

- To establish a structured and transparent framework for identification, approval, implementation, monitoring and reporting of CSR activities.
- To undertake CSR projects and programmes falling within the activities specified in Schedule VII of the Companies Act, 2013, as amended from time to time.
- To address relevant social, educational, environmental, rural development and community needs in a sustainable and measurable manner.
- To encourage projects that create durable and meaningful social impact, while ensuring compliance with applicable law.
- To promote responsible and transparent utilisation of CSR funds and appropriate monitoring of outcomes.

3. CSR FOCUS AREAS

Subject to the CSR Framework and the annual CSR Action Plan approved by the Board, the Company may undertake projects/programmes in areas including, but not limited to:

Focus Area	Indicative Activities
Education	Promotion of education, including support for school infrastructure, sanitation, drinking water, fans and other essential facilities; support for science and technology equipment; scholarships or assistance for higher education; and education and nutritional support for children with disabilities.
Gender Equality and Women Empowerment	Adult literacy, skill development and vocational training for women, and initiatives promoting gender equality and empowerment.

Senior Citizens and Social Inclusion	Support for old-age homes and facilities for senior citizens and measures aimed at reducing inequalities faced by socially and economically disadvantaged groups.
Rural Development	Improvement of drinking water, sanitation, electricity/power access, livelihood opportunities and other interventions contributing to sustainable rural development.
Sports	Promotion of sports, including training in rural sports, nationally recognised sports and para-sports, subject to Schedule VII.
Relief and Welfare	Contribution to eligible Central Government funds or other eligible funds/activities specified in Schedule VII for socio-economic development, relief and welfare of eligible communities.
Other Schedule VII Activities	Any other activity falling within Schedule VII of the Companies Act, 2013, as amended from time to time, may be undertaken with the approval of the Board in accordance with the CSR Action Plan.

The above list is illustrative and shall not be construed as restricting the Company from undertaking any other activity specifically covered by Schedule VII.

4. GOVERNANCE AND CSR COMMITTEE

Where constitution of a CSR Committee is required under Section 135 of the Companies Act, 2013, the Board shall constitute the CSR Committee in accordance with applicable law. The CSR Committee shall assist the Board in overseeing the Company's CSR framework.

- Formulate and recommend to the Board the CSR Policy and amendments thereto.
- Recommend the CSR activities/projects and the annual CSR Action Plan for approval by the Board.
- Recommend the CSR expenditure to be incurred on approved projects/programmes.
- Establish an appropriate mechanism for implementation, monitoring and evaluation of CSR projects.
- Review progress of CSR projects and utilisation of CSR funds at appropriate intervals.
- Prepare and submit periodic/annual reports and recommendations to the Board.

Where the amount required to be spent by the Company on CSR does not exceed the statutory threshold prescribed under Section 135, the functions of the CSR Committee may be discharged by the Board, to the extent permitted by law.

5. ROLE OF THE BOARD OF DIRECTORS

- Approve the CSR Policy and any amendments thereto.
- Approve the annual CSR Action Plan and the CSR expenditure, after considering recommendations of the CSR Committee, where applicable.
- Ensure that the Company undertakes CSR activities and spends the prescribed CSR obligation in accordance with Section 135 and the CSR Rules.
- Satisfy itself that the CSR funds disbursed have been utilised for the approved purposes and in the manner approved by the Board.
- Ensure that the Chief Financial Officer or the person responsible for financial management certifies the utilisation of CSR funds, as required under the CSR Framework.

- Ensure appropriate disclosures of the CSR Policy, CSR activities and other prescribed information on the Company's website and in the Board's Report.
- Take appropriate action in respect of unspent CSR amounts in accordance with applicable law.

6. CSR ACTION PLAN

The annual CSR Action Plan approved by the Board shall, as applicable, set out:

- The list of CSR projects/programmes to be undertaken.
- The manner of execution of each project/programme.
- The modalities of utilisation of CSR funds and implementation schedules.
- Monitoring and reporting mechanisms.
- Details of need and impact assessment, wherever applicable.
- The budget and proposed CSR expenditure for each project/programme.
- Such other particulars as may be required under the CSR Framework.

7. CSR BUDGET AND EXPENDITURE

The Company shall endeavour to spend the statutory CSR obligation, being the amount prescribed under Section 135 of the Companies Act, 2013, based on the average net profits computed in accordance with the Act and the CSR Rules.

CSR expenditure shall be incurred only on activities/projects approved by the Board and falling within the permissible CSR activities. Administrative overheads shall be maintained within the maximum limit prescribed under the CSR Rules. Expenditure directly incurred for designing, implementing, monitoring and evaluating a specific CSR project shall be treated in accordance with the CSR Rules.

The Company may utilise the permitted set-off of excess CSR expenditure against subsequent years, where available and subject to the conditions prescribed under the CSR Rules.

Any surplus arising out of CSR activities shall not form part of the business profits of the Company and shall be dealt with in accordance with the CSR Rules.

8. IMPLEMENTATION OF CSR ACTIVITIES

CSR activities may be undertaken directly by the Company or through eligible implementing agencies, in accordance with the CSR Rules.

- The Company may engage eligible implementing agencies having the registrations, approvals and prescribed CSR-1 registration, wherever required by law.
- Before appointment, the Company shall undertake appropriate due diligence of implementing agencies, including their legal status, relevant experience, governance, financial credentials and track record, as considered appropriate.
- Project-specific agreements/MOUs may be executed with implementing agencies setting out the scope, budget, milestones, reporting requirements, utilisation conditions and monitoring arrangements.
- The Company may collaborate with other companies for undertaking CSR projects, subject to applicable legal and reporting requirements.

- International organisations may be engaged for designing, monitoring or evaluating CSR projects or for capacity building only to the extent permitted by the CSR Framework.
- Creation or acquisition of capital assets through CSR shall be undertaken only where permitted by the CSR Rules and the asset is held by an eligible entity, beneficiary or public authority as prescribed.

9. MONITORING AND EVALUATION

- Each CSR project shall have appropriate objectives, deliverables, timelines and financial parameters commensurate with its nature and size.
- The CSR Committee, where applicable, or the Board/authorised CSR team shall periodically review project progress and utilisation of funds.
- Implementing agencies shall provide utilisation statements, progress reports and supporting documents as required by the Company.
- The Company may conduct site visits, obtain utilisation certificates, seek independent verification or undertake other monitoring measures considered appropriate.
- Impact assessment shall be undertaken wherever mandatory under the CSR Framework and may also be undertaken voluntarily where considered appropriate by the Company.
- Monitoring shall focus on both financial utilisation and achievement of intended outputs/outcomes.

10. RESTRICTIONS / ACTIVITIES NOT TREATED AS CSR

The Company shall not treat the following as CSR expenditure to the extent excluded by the CSR Framework:

- Activities undertaken in pursuance of the normal course of business of the Company, except where specifically permitted under the CSR Framework.
- Activities undertaken outside India, except activities specifically permitted under Schedule VII/CSR Rules, such as certain sports training initiatives, as applicable.
- Contribution of any amount, directly or indirectly, to political parties under the relevant provisions of the Companies Act, 2013.
- Activities benefitting only the employees of the Company and their families, except to the extent specifically permitted under the CSR Framework.
- Activities supported as sponsorships primarily for deriving marketing benefits for the Company's products or services.
- Activities carried out to fulfil any other statutory obligation under applicable law, except to the extent specifically recognised as CSR under the CSR Framework.
- Any other expenditure expressly excluded from CSR under the Act or Rules.

11. UNSPENT CSR AMOUNT

In case of any unspent CSR amount, the Company shall comply with the procedure, timelines and transfer requirements prescribed under Section 135 and the CSR Rules, including, where applicable, transfer to the Unspent CSR Account for an ongoing project and subsequent utilisation within the prescribed period, or transfer to a fund specified in Schedule VII within the prescribed timeline for amounts not relating to an ongoing project.

12. CSR REPORTING AND DISCLOSURES

- The Company shall include the prescribed CSR disclosures in the Board's Report/Annual Report in the format and manner required under the Companies Act and CSR Rules.
- The Company shall display the CSR Policy, composition of the CSR Committee (where applicable), approved CSR projects and other prescribed information on its website.
- The Company shall make all prescribed filings and disclosures relating to CSR, including any applicable CSR-2 filing, within the statutory timelines.
- Records supporting CSR expenditure, project implementation, utilisation and monitoring shall be maintained for the period required under applicable law and the Company's record-retention practices.

13. TRANSPARENCY AND ACCOUNTABILITY

The Company shall endeavour to maintain transparency in the selection, implementation and monitoring of CSR projects. CSR funds shall be used only for approved purposes. The Company may require appropriate documentation and certifications from implementing agencies to establish proper utilisation and progress.

14. REVIEW OF THE POLICY

This Policy shall be reviewed periodically and may be amended by the Board based on recommendations of the CSR Committee, where applicable, or otherwise as considered necessary, including to reflect changes in the Company's CSR priorities, operating environment or applicable law.

15. INTERPRETATION AND PREVAILING LAW

This Policy shall be read together with the Companies Act, 2013, Schedule VII, the Companies (Corporate Social Responsibility Policy) Rules, 2014 and all other applicable laws, notifications, circulars and amendments. In the event of any inconsistency between this Policy and applicable law, the provisions of applicable law shall prevail.

DOCUMENT CONTROL / APPROVAL

Policy Owner	CSR Committee
Approved By	Board of Directors and CSR Committee of Jammu Pigments Limited
Review	As and when required, and in accordance with applicable law