



Uniphos Envirotronic Pvt. Ltd.

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Website: www.uniphos-envirotronic.com
CIN: U29297GJ2007PTC052025

A UPL Group Company

UNIPHOS ENVIROTRONIC PVT. LTD.

Corporate Social Responsibility (CSR) Policy

1. Preamble

Uniphos Envirotronic Pvt. Ltd. ("Company", "We", "Us") is committed to being a responsible corporate citizen. We recognize our duty to contribute to the social, environmental and economic development of the communities where we operate. We believe that business and community development go hand-in-hand, and sustainable growth demands that we integrate social and environmental concerns in all our operations.

This CSR Policy is formulated pursuant to Section 135 of the Companies Act 2013 ("Act") read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended) ("CSR Rules"), and Schedule VII of the Act, as applicable. This policy sets out guiding principles, governance, focus areas, implementation and reporting mechanisms for CSR initiatives of the Company.

2. Company's Profile & Applicability

- Industry: Environment Monitoring Solutions (Gas detection, Ambient Air Quality Monitoring, Water Quality Analyzers etc.)
- Gross Revenue (for last fiscal): **₹54.15 crores**
- Net Profit (for last fiscal): **₹8.50 crores**

Applicability under Section 135, Act:

- As per Section 135(1), any Company which in the immediately preceding financial year has a **net profit** of ₹5 crore or more, or





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turnover of ₹1,000 crore or **net worth** of ₹500 crore or more, is required to comply with CSR provisions.

- Since the Company's net profit is **₹8.50 crores**, which is more than ₹5 crores, it crosses that threshold in the immediately preceding financial year.
- Consequently, for that year, the mandatory obligation to constitute a CSR Committee under Section 135 and spend 2% of average net profits apply.

3. Statement of Intent

As strictly mandated in a given year (given the current financials), the Company commit to CSR activities in alignment with its values and long-term vision, so as to:

- Enhance community welfare around our operations
- Contribute to environmental sustainability in ways aligned with our core competencies
- Build stronger relationships with stakeholders through meaningful action
- Prepare for future compliance and leadership in corporate responsibility





4. Definitions

Term	Definition
CSR	Corporate Social Responsibility as defined under Section 135 of the Act, including programmes/projects in areas specified in Schedule VII.
Schedule VII	The Schedule in the Act listing subject-matters on which CSR activities may be undertaken.
CSR Committee	If applicable, the committee of Directors responsible for CSR oversight.
Net Profit	Profit as defined in Section 198 of the Act for CSR purposes; excludes profits of a capital nature etc.
Ongoing Project	A multi-year project which has been approved and has a timeline extending beyond one financial year.

5. CSR Governance

5.1 CSR Committee

- If the Company meets the threshold under Section 135, it shall constitute a **CSR Committee of the Board** consisting of three or more Directors, with at least one Independent Director, as required.
- The duties of the CSR Committee will include:
 1. Formulating and recommending the CSR Policy to the Board.
 2. Recommending CSR projects / programmes and the amount of expenditure.
 3. Overseeing implementation and monitoring of CSR policy.





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4. Reporting to the Board on progress, obstacles, and outcomes.

5.2 Role of the Board of Directors

- Approve the CSR Policy (or any revisions) after considering Committee recommendations.
- Disclose the CSR Policy and the Company's CSR initiatives in the Board's Report.
- Ensure transparency and accountability in spending and impact tracking.
- Ensure if the Company becomes required under law, that it spends the required minimum (2%) of average net profits, transfers unspent amounts appropriately, etc.

6. Focus Areas / CSR Activities

Given the Company's domain in environmental monitoring, and its strengths, the CSR initiatives will focus on the following areas (drawn from Schedule VII and aligned with core competence):

1. Environmental Sustainability & Conservation

- Air quality awareness & monitoring programmes in local communities
- Tree planting, green belt / urban forestry around operational areas
- Water conservation, rainwater harvesting, water quality improvement in nearby villages
- Clean-up of water bodies or river/stream conservation





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2. Health, Safety & Hygiene

- Community health camps (general, respiratory health) in areas impacted by pollution
- Awareness of safety, industrial hygiene and environmental hazards

3. Education & Skill Development

- Vocational training related to environment / monitoring / instrumentation for youth in nearby regions
- Supporting schools (infrastructure, science labs, environmental education) in communities around operations

4. Livelihood Enhancement & Sustainable Technologies

- Supporting self-help groups or small enterprises in activities that are environmentally friendly (e.g., sustainable agriculture, agro-forestry, renewable energy)
- Water-filtering / purification systems, affordable monitoring devices for community usage

5. Disaster Relief / Rehabilitation

- Support to local communities in case of natural disasters (floods, droughts etc.) with relief, rebuilding, clean water etc.

7. Budget & Expenditure

- **Commitment:** The Company will comply fully with 2% spending requirement (Approx. ₹9.50 lakhs) as per Section 135.





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- **Capital Expenditure:** Any capital expenditure for CSR projects shall be planned and approved in advance by the Board (or CSR Committee, when applicable).
- **Administrative Overheads:** Overheads (project management, capacity building, monitoring etc.) shall not exceed **5%** of total CSR budget for the year.

8. Implementation & Modality

- Projects may be implemented:
 - a) **Directly** by the Company; or
 - b) Through **Registered NGOs / Trusts / Societies** having minimum 3 years' track record in similar CSR activities; or
 - c) Collaboration with governmental / local bodies / academic institutions.
- For each project, due diligence shall be carried out on implementing partner(s) with respect to background, capability, credibility, legal compliances.
- Wherever possible, priority shall be given to programmes in the **local area** around Company's operations (i.e., in and around Umbergaon, Valsad, Gujarat) or areas where impact can be clearly tracked.

9. Monitoring, Reporting & Evaluation

- The CSR Committee (or Board, if no Committee required in voluntary phase) will monitor implementation through periodic progress reports (quarterly or semi-annually) from implementing partners.





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- On-site visits and stakeholder feedback will be used to assess efficacy and challenges.
- Maintain records of expenditures, project outcomes, any deviations, delays.
- Annual CSR report to be included in the Board's Report as per provisions of Section 135 and Rules. Even in voluntary phase, the Company will disclose its CSR activities, budget, expenditure and outcomes in its Annual Report and on website.

10. Unspent CSR Funds and Surplus

- Since current financials indicate voluntary CSR (i.e. below statutory threshold), the Company shall maintain transparency regarding any unspent portion of the allocated CSR budget.
- For periods when the Company is required under Section 135:
 - If any approved CSR funds remain unspent at end of financial year, such amount shall be transferred to a separate "Unspent CSR Account" within 30 days.
 - The Company shall endeavor to spend unspent amounts within **3 years**.
 - If still unspent, transfer to a fund specified in Schedule VII of the Act.

11. Impact Assessment

- For any project / program with **outlay of ₹1 crore or more** (when the Company is under statutory CSR requirement) and/or for which the average CSR obligation over preceding three years is ₹10 crores or more,





the Company shall conduct impact assessment through an external independent agency.

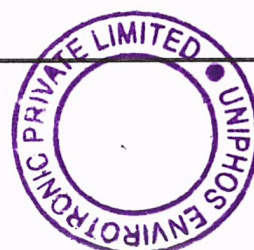
- For current voluntary projects, internal evaluation and beneficiary feedback will be obtained.

12. Disclosure & Transparency

- The CSR Policy document shall be disclosed on the Company's website.
- Board's report (Annual Report) will contain:
 1. A brief outline of CSR Policy.
 2. Composition of CSR Committee (if applicable).
 3. Details of CSR spend, projects/programmes, beneficiaries.
 4. Where amount unspent: reasons.
- Any amendments to this Policy shall be approved by the Board and disclosed.

13. Review & Amendment

- This CSR Policy shall be reviewed annually by the CSR Committee (or by the Board in voluntary phase) to ensure it remains aligned with:
 - Changes in applicable law / regulations;
 - Company's financial performance;
 - Stakeholder expectations;
 - Environmental/social priorities.
- Board may approve amendments as needed.





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14. Effectiveness

This Policy is effective from the date of Board approval. In the voluntary phase, the Company commits to implement its CSR obligations, best practices and reporting in good faith. When thresholds under Section 135 are met, full legal compliance will be ensured.

Approval

This Corporate Social Responsibility Policy was approved by the Board of Directors of **Uniphos Envirotronic Pvt. Ltd.**, at its meeting held on 28th February 2023.

For Uniphos Envirotronic Private Limited.

Director

