JAYA HIND INDUSTRIES PRIVATE LIMITED Mumbai - Pune Road Akurdi, Pune 411 035

CIN: U74999PN1947PTC005480

Corporate Social Responsibility Policy

l) Preamble-

As per the provisions of Section 135 of the Companies Act, 2013 (**the Act**) read with the Companies (Corporate Social Responsibility Policy) Rules 2014 (**the Rules**), the Board of Directors of Jaya Hind Industries Limited (**the Company**) constituted the Corporate Social Responsibility Committee (**the CSR Committee**) vide its resolution dated 29th July 2014 and directed formulation of the Corporate Social Responsibility Policy (**the CSR Policy**), as defined in Rule 2(1) of the Rules.

Accordingly the following policy is being recommended by the CSR Committee, for the consideration and approval of the Board of Directors of the Company.

II) Applicability of Section 135 of the Act-

Considering the turnover, net worth and profitability of the Company for the financial year 2013-14 and current financial year 2014-15, the Company is governed by Section 135 of the Act and the Rules.

Accordingly Company should make expenditure, of the required amount, on following causes, being causes to be the pursued, assisted, helped and acted upon, in fulfillment of the Corporate Social Responsibility (**CSR**) of the Company.

- (i) Activities relating to health care.
- (ii) Activities for promoting health care facilities for senior citizens, children, and women, including setting up of old age homes, day care centre(s) for senior citizens.
- (iii) Activities relating to rural development.
- (iv) Activities relating to sanitation.
- (v) Activities relating to education.
- (vi) Other activities as may be deemed fit by the Committee / Board of Directors of the Company, from time to time.

III) Amount to be spent-

Considering the profit of each of the financial year, the Chief Financial Officer (**CFO**) of the Company shall indicate amount to be spent during each of the financial year, as expenditure for the project(s) to be undertaken as per this CSR Policy.

It is clarified that any amount spent by the Company on the administrative actions in respect of the CSR Project(s), being undertaken or supported by the Company, as part of its CSR initiative, should be treated as an amount of expenditure incurred for such CSR Project(s).

IV) Procedure for approval of the Project(s), investment/incurring costs and monitoring-

- (i) Based on the certificate of the CFO indicated in the clause III of this Policy, the Board of Directors of the Company, for each of the financial year, shall approve the Project(s), on which the Company should incur costs or make contribution as part of the Company's CSR activity.
- (ii) Based on the approval of the Board of Directors, the CSR Committee shall authorize expenditure budget or amount to be contributed for each of the CSR Project or initiative on quarterly basis.
- (iii) While approving the budget of any CSR initiative, the Committee should indicate the nature of the activity, activity being part of Schedule VII to the Act, heads of expenditure/contribution, whether the initiative to be undertaken by the Company alone or jointly with other entities.
- (iv) The process of approval of expenditure, acquisition of assets, accounting to be followed by the Company should be followed in respect of each of the expenditure/investment/contribution for CSR Project, same as being undertaken by the Company for accounting of any such expenditure/investment/contribution made in the normal course of business.
- (v) The Executive Management of the Company shall submit on quarterly basis the account of expenditure/contribution, incurred/made during the previous quarter, variation in CSR budget approved by the CSR Committee, if any, with explanation for variation to the CSR Committee through the Chairman or the Managing Director of the Company.
- (vi) If in any financial year the expenditure/contribution for the approved CSR Project is less than the sanctioned/budgeted amount, the surplus should be transferred by the Company to the 'Reserves for CSR Project and Initiative A/c.' and should not be treated as profit available for appropriation.
- (vii) On recommendation of CSR Committee, the Board of Directors of the Company may modify the budget or approval in respect of any particular CSR initiative of the Company or decide to abandon, such initiative, subject to the compliance of the applicable provisions of the Act.
- (viii) CSR Committee to submit Annual Report, regarding CSR Activity, to the Board, duly signed by all the Members, for the time being, of the CSR Committee and assist the Board in completing the format for the Annual Report on CSR activity to be made part of the Board Report.
- V) The Company's CSR Programme shall be implemented through Company personnel or through external implementing agencies or through a registered trust / company/ registered society that may be established under Section 8 of the Act either singly or along with its holding or subsidiary or associate company or along with any other company or holding or subsidiary or associate company of such other company.
- VI) This policy on approval of the Board shall come into force for financial year 2014-15 and shall remain in force till modified or substituted by the Board as per the prescribed procedure.