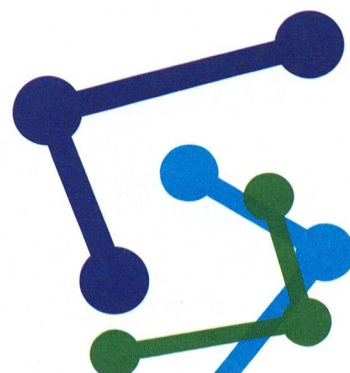


CORPORATE SOCIAL RESPONSIBILITY POLICY



SILVIN ADDITIVES PRIVATE LIMITED
(FORMERLY KNOWN AS BASIL PROMPT VINYL PRIVATE LIMITED)

**(Revised, approved, and adopted by the
Board in its meeting held on 16th May 2025)**



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CORPORATE SOCIAL RESPONSIBILITY ("CSR") POLICY
OF
SILVIN ADDITIVES PRIVATE LIMITED ("THE COMPANY")

1. INTRODUCTION

Silvin Additives Private Limited is a Private Limited Company engaged in the business of manufacturing PVC and CPVC pipes & fitting Super1pack, compound and granules in India for almost three decades. The Company is making the whole range of "Silvin" branded Super1packs for PVC and CPVC Pipes and Fittings, the most trusted name in the PVC & CPVC industry.

The Company believes that the real progress occurs when privileges are balanced with the responsibilities towards society. Your Company has always laid emphasis on progress with a social commitment. The Company strongly believes in the philosophy of giving back to the community and serving the community and society in which the Company operates. We believe strongly in our core values of empowerment and betterment of not only the employees but also our communities. Following this principle, the company has developed a comprehensive approach towards promoting and facilitating various aspects of our surrounding communities, work-force and their families. The CSR Policy sets out the fact that the commitment of the Company's Activities extends beyond its business and profits and its endeavor to benefit all its stakeholders at large.

2. OBJECTIVE

This policy is framed in accordance with the applicable provisions of the Section 135 of the Act and the relevant ruled made thereunder. The CSR Policy was initially adopted by the Board in its meeting held on 25th October, 2021. Subsequently, to incorporate recent legislative developments and to better align with the Company's evolving goals, the Policy underwent revision and was approved & adopted by the Board on 16th May, 2025, becoming effective from this date. All matters preceding this this revision shall be governed by the previous policy.

The main objective of this CSR Policy is to lay down the guidelines for the Company to make CSR one of the key focus areas, in alignment with Silvin's global interest in environment and society that focuses on making a positive contribution to society through effective impact and sustainable development programs. This Policy covers the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Companies Act, 2013, as amended from time to time. It covers the CSR activities which are being carried out in India only and includes a strategy that defines plans for future CSR initiatives.

3. SCOPE & APPLICABILITY:

This Policy shall apply to all the CSR projects undertaken by the Company, whether such projects are executed in collaboration with any other entity or on its own.

4. DEFINITIONS AND INTERPRETATIONS:

In this Policy, unless the context otherwise requires:

1. **"Act"** shall mean the Companies Act, 2013 and the rules made thereunder, including any modification, amendments or re-enactment thereof.
2. **"Administrative overheads"** means the expenses incurred by the Company for 'general management and administration' of Corporate Social Responsibility functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.
3. **"Board"** means the Board of Directors of the Company.
4. **"Company"** means Silvin Additives Private Limited (formerly known as Basil Prompt Vinyl Private Limited).
5. **"CSR"** means Corporate Social Responsibility.
6. **"CSR Committee"** means the Corporate Social Responsibility Committee constituted by the Board in terms of Section 135 of the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014.
7. **"CSR Expenditure"** means all CSR expenditure of the Company as approved by the Board upon recommendation of the CSR Committee.
8. **"CSR Focus Areas"** means the areas of focus selected from the list of areas specified in Schedule VII of the Act.
9. **"CSR Policy"** shall mean the present Corporate Social Responsibility Policy of the Company, as amended from time to time which covers the activities to be undertaken by the Company as specified in Schedule VII to the Act and the CSR Expenditure thereon.
10. **"CSR Projects"** or **"Projects"** means Corporate Social Responsibility Projects / activities / programs / initiatives instituted in India, either new or ongoing, and include but not limited to those undertaken by the Board in pursuance of recommendations of the CSR Committee as per the declared CSR Policy of the Company.

11. "Financial Year" shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.

12. "Implementing Agency" means an implementing agency as mentioned in Rule 4 of the Rules (which, in each case, shall be registered with Ministry of Corporate Affairs in accordance with Rules for undertaking CSR activities) and shall include but not limited to the following:

- i. In case it is established by the company either singly or jointly with other company, a company established under Section 8 of the Act or a registered public trust or a registered public society established by the company either singly or jointly with other company, and registered under section 12A and 80G of the Income Tax Act, 1961;
- ii. In case of agency established by a Third party, it can be through a company established under Section 8 of the Act or a registered public trust or a registered public society and registered under section 12A and 80G of the Income Tax Act, 1961 and should have a track record of at least three years in undertaking similar activities.

13. "International Organization" means an organization notified by the Central Government as an international organization under section 3 of the United Nations (Privileges and Immunities) Act, 1947 (46 of 1947), to which the provisions of the Schedule to the said Act apply;

14. "Net profit" for the purpose of CSR Policy means Net profit as per its financial statement prepared in accordance with the applicable provisions of the Act, but doesn't include: -

- i. Any profit arising from any overseas branch or branches of the Company, whether operated as a separate Company or otherwise; and
- ii. Any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act.

15. "Ongoing Project" means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification;

16. "Rules" shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re-enactment, modifications or amendments thereof.

17. "Trust" means a Trust created and registered under the India Trust Act, 1882 or any Trust created and registered with charitable objectives by the Company and includes a Trust jointly created and registered by the Company with all or any of its Group companies.

Words and expression used and not defined in the Policy shall have the same meanings respectively assigned to them in the Act and/or Rules.

5. CSR ACTIVITIES

Projects shall be selected on the basis of need identification studies, internal need assessment or receipt of proposals. Projects shall be evaluated against goals and milestones defined for the project, together with the implementing agency (if any). All activities are identified in a participatory manner, in consultation with the community of the areas where the Company's operations are carried on, thereafter, the activities are prioritized.

This CSR Policy details chosen areas of focus selected from the list of areas detailed in Schedule VII of the Act. However, these focus areas are an indicative statement of intent, and our CSR Committee/ Board will have the ability to deploy the funds earmarked for the CSR budget in any intervention they deem fit, irrespective of whether the proposed interventions are covered under our CSR Focus Areas. The list of key CSR focus areas is enumerated below: -

(A) Education

Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.

(B) Promoting gender equality and Providing shelter and support

promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.

(C) Promoting health care

Eradicating hunger, poverty and malnutrition, ["promoting health care including preventive health care"] and sanitation [including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water.

(D) Environment sustainability

Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water [including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga].

(E) Any other activity as prescribed under schedule VII of the Companies Act, 2013

For fulfilling the objectives, the Company intends to give preference to the local area/s around where it operates. However, considering the need the CSR Committee/ Board will decide on the locations for CSR activities to be carried out.

6. ALLOCATION OF FUNDS (MODALITIES OF UTILIZATION OF FUNDS):

- 6.1.** The Companies Act, 2013 prescribes that the companies which meet the criteria specified u/s 135 shall allocate certain portion of its annual net profits (calculated as per Sec. 198) during the three immediately preceding financial years to be spent on CSR Activities that fall under the categories specified under Schedule VII of the Act.

- 6.2. The Company, in every Financial Year, shall endeavor to spend such feasible amount as CSR Expenditure as decided by the CSR Committee/ Board in accordance with this Policy, the Act and the Rules.
- 6.3. The total expenditure proposed in the CSR annual action plan shall be approved by the Board.
- 6.4. In case the Company fails to spend the statutory minimum limit in any given financial year, the Board shall specify the reason for the same in its report in terms of Section 134(3)(o) of the Act and such shortfall shall be treated as per the provisions of the Act and the Rules, as mentioned below:

(i) Unspent amount not relating to Ongoing Project:

If there is an unspent amount with the Company which was required to be spent under CSR but could not be spent by the Company and which is not pertaining to the ongoing projects then such amount is required to be transferred to the fund specified in Schedule VII of the Companies Act, 2013 within a period of 6 months from the end of relevant financial year.

(ii) Unspent amount relating to ongoing Project:

In case there is an unspent amount relating to ongoing project then such unspent amount is required to be transferred within a period of thirty days from the end of relevant financial year to a special account to be opened by the Company with Scheduled commercial bank to be called the Unspent CSR Account (UNCSRA).

7. ANNUAL ACTION PLAN:

In order to carry out all or any of the above said activities, the Company will make an Annual Action Plan which the Board will approve upon the recommendation of the CSR Committee, such Annual Action plan will inter alia define: -

- i. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- ii. the manner of execution of such projects or programs;
- iii. the modalities of utilization of funds and implementation schedules for the projects or programmes;
- iv. monitoring and reporting mechanism for the projects or programmes; and
- v. details of need and impact assessment, if any and applicable, for the projects undertaken by the Company.

Provided that the Board may alter approved Annual Action Plan at any time during the financial year, as per the recommendation of the CSR Committee and with reasonable justification.

8. CSR COMMITTEE/BOARD

8.1. Constitution:

Section 135 of Companies Act, 2013 mandates every company having: -

- i. a net worth of Rs. 500 Crore or more; or
- ii. a turnover of Rs. 1,000 Crore or more; or
- iii. a net profit of Rs. 5 Crore or more

during the immediately preceding financial year, shall constitute a Corporate Social Responsibility (CSR) Committee, **if the amount required to be spent by a company under sub-section (5) of Section 135- exceed fifty lakh rupees.**

The members of CSR Committee shall be appointed by the Board of Directors of the Company and must consist of at least three or more Directors. Accordingly, the constitution of CSR Committee formed by the Company is as follows: -

S. No.	Name	Position
1.	Mr. Pradipkumar Occhavlal Chokshi	Chairperson
2.	Mr. Jagatkumar Pradip Chokshi	Member
3.	Mr. Shridhar Pravinchandra Mehta	Member

The Board shall have the power to make any change(s) in the constitution of the CSR Committee. Any member of the CSR Committee may be removed or replaced at any time by the Board and shall cease to be a member of the CSR Committee upon ceasing to be a Director of the Company. The Board shall fill any vacancy in the CSR Committee by appointment from among its members, in accordance with the provisions of the Companies Act, 2013 and the Rules made thereunder, as amended from time to time or in the next meeting after such vacancy, whichever is later. Composition of the CSR Committee shall be disclosed in the Board's Report. The term of the Committee shall be continued unless otherwise terminated by the Board of Directors.

8.2. Roles and responsibilities of Corporate Social Responsibility Committee/ will be as under:

- i. To formulate a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company and recommend the same to the Board of Directors of the Company for approval.
- ii. To formulate and recommend the list of CSR projects or programmes to be undertaken in areas or subjects specified in Schedule VII of the Act;
- iii. To finalize the amount of expenditure to be incurred on the activities referred to in clause (b);
- iv. To ensure the allocated CSR amount is spent on the approved CSR activities in accordance with the Act and the CSR Rules, once approved by the Board..

- v. To prepare a transparent monitoring mechanism for ensuring implementation of the projects / programmes / activities proposed to be undertaken by the Company; to review CSR activities from time to time, undertake necessary corrective actions, if required and reporting of the CSR activities to CSR Committee/Board;
- vi. To explain the manner in which the surplus arising from CSR projects will be treated; and
- vii. To place before the board, the draft annual report and Annual action plan for undertaking the CSR activities, for its review and approval, as per the format in annexure to the Rules.
- viii. To work with management to establish, develop and provide guidelines on the Company's strategic framework and objectives with respect to CSR matters;
- ix. To receive reports/ certificate from management on current and future projects and activities to ensure compliance with the CSR policy and obligations.
- x. To review the Company's disclosure of CSR matters in the Company's continuous disclosure documents and any annual social responsibility report.
- xi. To review details of need and impact assessment, if any and applicable, undertaken by the Company.
- xii. To undertake any other activity necessary to ensure achievement of Company's CSR objectives.

The CSR Committee shall have the power to obtain advice and assistance from external legal or other advisors, in its sole discretion in order to fulfill its role and responsibilities.

The CSR committee/Board may form a small group of employees for carrying out CSR related activities under its supervision as and when the need arises. If required a local man including villagers may also be included as a coordinator or as a link man to achieve the target as well as ensuring participation of local representative in formulating the CSR activities in order to obtain the maximum benefit for the community.

In case of need, close coordination may also be undertaken with NGOs to strengthen the CSR activities. If the CSR Committee/Board is satisfied it may also donate appropriate funds to any NGO or local body if they are operating in line with CSR activities and thereby contributing indirectly for the attainment of desired results in the area of CSR activities.

8.3. Meetings of the Committee

For smooth functioning of the Committee, the members shall meet as below to discuss such matters and to take such decisions as may be necessary: -

- a. The CSR Committee shall meet at such intervals as may be deemed necessary to effectively discharge its responsibilities.
- b. The members of the Committee may mutually agree on the time and place for the said meetings.

- c. 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.
- d. The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio-visual means as may be convenient.
- e. Matters arising for determination at CSR Committee Meetings shall be decided by a majority of votes of CSR Committee Members present and voting, and any such decision shall, for all purposes be deemed to be a decision of the CSR Committee.
- f. The Company Secretary of the Company, if any, shall coordinate and facilitate the meeting of CSR Committee.
- g. In the absence of the Chairman, the members of the Committee present at the meeting shall choose one amongst them to act as Chairman of the Committee.

The Committee shall ensure that the Administrative Overheads shall not exceed 5% of total CSR Expenditure of the Company for the relevant financial year.

9. IMPLEMENTATION STRATEGY

The Company shall implement the identified CSR Projects by the following means: -

(A) Direct Method

The Company may on its own spent the amount under CSR Projects /activities presently within the scope and ambit as defined in Schedule VII of the Companies Act, 2013 as amended from time to time or in collaboration with other companies / trusts / NGOs undertaking projects/ programs in CSR activities.

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

The Company may collaborate with other companies if required, for fulfilling its CSR objects through the Direct Method, provided that the CSR Committees/Board of respective companies are in a position to monitor separately such CSR Projects.

The Company may set up any foundation or body incorporated by the company and eligible to undertake such CSR Projects.

(B) Through Implementing Agencies / Indirect Spending:

The Company may spend the amount under CSR projects / activities through any Implementing Agency that is: -

- i. A Company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961 (43 of 1961), established by the Company, either singly or along with any other Company, or

- ii. A Company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- iii. Any entity established under an Act of Parliament or a State legislature; or
- iv. A Company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Provided that such implementing agencies are registered with the Central Government, as may be required by applicable Law.

(C) Collaboration with Other Companies

The Company may collaborate with other companies for undertaking CSR Projects or programs or activities in such a manner that the CSR Committee of the Company is in a position to report separately on such projects or programs in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.

(D) Engagement of International Organizations

The Company may also engage international organizations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR policy as well as for capacity building of their own personnel for CSR.

(E) Acquisition of Capital Assets

The Company may also acquire capital assets for the purpose of carrying out various activities as mentioned herein before in order to achieve its objectives subject to the fulfillment of the conditions as prescribed in the Act.

10. MONITORING AND REVIEW OF CSR PROJECTS/ACTIVITIES

All CSR activities shall be monitored by the CSR Committee/Board on regular basis. The review discussions shall be held amongst the CSR Committee members/ Board of Directors and/CSR execution team (if any) and other participants for further improvement.

- a. On recommendation of the CSR Committee, the Board will approve the Annual Action Plan.
- b. The Board will satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it. The Board will **obtain a certificate** from Chief Financial Officer (if any) or the person responsible for financial management who will certify the same in this regard.
- c. The CSR Committee/Board will review the implementation of the CSR Projects during regular intervals and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Projects in accordance with this CSR Policy.

11. DISCLOSURE IN THE BOARD OF DIRECTORS' REPORT

As required by the provisions of the Act and Rules made there under, contents of the CSR Policy will be disclosed in the Report of the Board.

12. DISPLAY OF CSR ACTIVITIES ON ITS WEBSITE

The Board shall disclose the composition of the CSR Committee, this CSR Policy and the Projects approved by the Board on the website of the Company.

13. IMPACT ASSESSMENT

Mandatory impact assessment (if applicable) will be undertaken as per the criteria specified under applicable law, and that the impact assessment reports will be placed before the Board and disclosed as per the Act and CSR Rules.

14. SURPLUS OUT OF CSR ACTIVITIES

- a. The Board shall ensure that all expenditure towards the programs/ activities to be diligently documented.
- b. Any surplus arising out of the CSR projects or programmes or activities shall not form part of the business profit of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of this policy and annual action plan or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- c. If the Company has spent any excess amount, it may set off the excess amount spent i.e. amount spent more than required as per section 135(5), against its obligation to be spent up to immediate succeeding three financial years, subject to approval of the Board, subject to the conditions that –
 - (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of this rule.
 - (ii) the Board of the company shall pass a resolution to that effect.

15. GENERAL

- a. Any amendment of any provision of this CSR Policy must be carried out as per the recommendations of the CSR Committee in due consultation, oversight and guidance of the Board and must be duly approved by the Board. Any subsequent amendment or modification in the Act and/or applicable laws in this regard shall automatically apply to this CSR Policy and shall prevail over anything stated in this CSR Policy from the date of notification of such amendment. Any amendments to this CSR Policy would be disclosed as per applicable laws and regulations.

- b. In case of any doubt with regard to any of the provisions of this CSR Policy and also in respect of any matters not covered therein, the interpretation and decision of the Chairman of the CSR Committee/ Board shall be final.

16. VALIDITY OF POLICY:

The CSR Committee/ Board may review and amend this policy from time to time with the recommendations of CSR Committee.

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