

(Formerly: Petro Carbon And Chemicals Private Limited)

Regd. Office:

Avani Signature, 6th Floor

91A/1, Park Street, Kolkata-700016

Plant:

Haldia Oil Refinery, Haldia - 721606

Dist: Purba Midnapur, WB

tel +91 33 40118400 mail pccl@athagroup.in

CIN U24110WB2007PLC120212

Corporate Social Responsibility Policy

I. Objective:

The objective of this Policy document is to articulate Anlon's core philosophy of social responsibility, to define the areas chosen by Anlon to impact the society with its efforts towards Corporate Social Responsibility ("CSR") and to define the governance & monitoring framework for ensuring effectiveness of this Policy. CSR Policy is in compliance, and in agreement with Section 135 of the Act, i.e.

- 1. To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII to the Act.
- 2. To recommend the amount of expenditure to be incurred on CSR activities.
- 3. To monitor the CSR Policy.
- 4. To ensure that the Company spends in every financial year, at least 2 (two) % of the average net profits of the Company made during the 3 (three) preceding financial years.

II. Definitions:

- i. "Act" means Companies Act, 2013 any modifications and/ or re-enactment thereof;
- ii. "Corporate Social Responsibility (CSR)" means and includes but is not limited to:
 - a. Projects or programs relating to activities specified in Schedule VII to the Act; or
 - b. Projects or programs relating to activities undertaken by the Board of Directors of the Company in pursuance of recommendations of the CSR Committee of the Board according to the CSR Policy of the Company, subject to the condition that such policy will cover subjects enumerated in Schedule VII to the Act;
- iii. "CSR Committee"(CSRC) means the existing Corporate Social Responsibility Committee of the Board as constituted under Section 135 of the Act and any reconstitution of the same from time to time;
- iv. "Board" means the Board of Directors of the Company from time to time;
- v. "SEBI (LODR) Regulations, 2015"/"LODR,2015" means Listing Obligations and Disclosure Requirements Regulations, 2015 as notified by the Securities and Exchange Board of India on September 02, 2015 effective from December 01, 2015 and any modification and amendment thereto.



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III. Areas to Emphasize

In terms of the CSR rules issued by the Ministry of Corporate Affairs, the Company will be focusing on undertaking the project /programs /activities listed below, as specified in Schedule VII to the Act excluding activities undertaken in pursuance of normal course of business of a Company:

- i. Eradicating hunger, poverty and mal-nutrition, promoting preventive health care and sanitation including contribution to the "Swachh Bharat Kosh" set-up by the Central Government for promotion of sanitation and making available safe drinking water;
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and differently abled and livelihood enhancement projects;
- iii. 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;
- iv. Ensuring environmental sustainability, ecological balance, and 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" setup by the Central Government for rejuvenation of river Ganga;
- v. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art, setting up public libraries, promotion and development of traditional arts and handicrafts;
- vi. Measures for the benefit of armed forces veterans, war widows and their dependents;
- vii. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- viii. Contribution to Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women;
- ix. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;



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- x. Rural development projects.
- xi. Slum area development.

Explanation — For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force."

xii. Disaster management, including relief, rehabilitation and reconstruction activities.

The Company has broadly selected four areas of focus under its CSR activities, as under:

- **Education and skill development:**
- > Environment Sustainability:
- Social Upliftment & Support to development activities
- Medical and other Welfare including animal welfare
- Emergencies and Natural Calamities
- > Promotion of Sports

III. Constitution:

- 1. The CSRC shall always consist of at least three (3) directors, out of which at least one (1) director shall be an independent director.
- 2. Membership of the CSRC shall be disclosed in the Annual Report.
- 3. The Company Secretary of the Company shall act as the Secretary of the CSRC.

IV. CSR Team:

Dedicated CSR team shall be constituted from among the employees at the company, for implementing the CSR Policy and shall work under the guidance of CSR Committee and will be mainly responsible for:

- Execution of CSR Policy.
- Identify projects and key initiatives pursuant to CSR Policy.
- Facilitating allocation of funds to the projects as identified for CSR activities.
- Monitoring CSR Projects to establish effectiveness of CSR efforts and appraise the same to CSR Committee.
- Compilation of information & preparation of Annual Reports on CSR activities and presenting the same to CSR Committee.
- Any other activity necessary to ensure achievement of CSR objectives.



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V. Roles and Responsibilities:

- 1. To disclose the composition of the CSRC in the Board's Report;
- 2. 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 the Act;
- 3. To recommend the amount of expenditure to be incurred on CSR activities;
- 4. To monitor the CSR Policy of the Company from time to time;
- 5. To disclose contents of the CSR Policy in its report and also place it on the Company's website, if any, in such manner as may be prescribed;
- 6. To ensure that the activities as included in the CSR Policy of the Company are undertaken by the Company;
- 7. To ensure that the Company spends, in every financial year, at least 2 (two) % of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of its CSR Policy;

Provided that the Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities.

Provided further that if the Company fails to spend such amount, the Board shall, in its report made under clause (o) of sub-section (3) of section 134 of the Act, specify the reasons for not spending the amount.

VI. Compliance

CSR Team will plan, implement, monitor and manage all CSR projects & activities for the Company and will work closely with the CSR Committees of the Board of the Group companies.

The CSR Team will formulate implementation plans for the projects specifying the following:

- Activities to be undertaken.
- · Budgets proposed.
- Time frame for implementation.
- · Responsibilities and authorities for implementation.
- Results expected to be achieved post implementation.



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VII. Monitoring

- The CSRC will monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports etc.
- · Mechanisms to track data and monitor projects will be established to ensure the transparency and efficiency of the implementation process.
- The projects will be evaluated against the milestones defined in the implementation plan of the project.

VIII. Reporting

- The CSRC of the Board, based on reports presented by the CSR Team, will annually publish report on the CSR projects as a part of the Director's report.
- The report will disclose information in the format as prescribed by the Section 135 of the Companies Act 2013.
- The CSRC shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR Policy is in compliance with the approved CSR Policy of the Company.
- The CSR Policy on being approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

IV. General

- 1. This Policy would be subject to revision/amendment in accordance with the guidelines as may be issued by the Ministry of Corporate Affairs from time to time, on the subject matter. In any case, the CSR Committee shall review this Policy every year once for making suitable amendments for better implementation thereof.
- 2. The Company reserves its right to alter, modify, add, delete or amend any of the provisions of this Policy.
- 3. The power to interpret and administer this Policy shall rest with the Chairman of the CSR Committee whose decision shall be final and binding. The Chairman is also empowered to make any supplementary rules/orders to ensure effective implementation of this Policy. These will, however, be reported to or tabled before the CSR Committee, from time to time, to ensure the CSR Committee's oversight on these issues.
