

Dhaval Packaging Limited

CORPORATE SOCIAL RESPONSIBILITY POLICY

Section 135 of the Companies Act, 2013 (the "Act") read with Companies (Corporate Social Responsibility Policy) Rules, 2014.



CORPORATE SOCIAL RESPONSIBILITY POLICY

1. PREAMBLE

In accordance with the provisions of Section 135 read with applicable rules thereto the Board of Directors of the Company vide its resolution dated October 18, 2025 formulated and approved this Corporate Social Responsibility Policy ("**Policy**") in its duly convened and held meeting of the Board ("**Board**"), dated October 18, 2025.

2. OBJECTIVE

The Committee shall formulate and recommend to the Board an annual action plan in pursuance of the Policy which shall include:

- a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- b) the manner of execution of such projects or programmes;
- c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- d) monitoring and reporting mechanism for the projects or programmes; and
- e) details of need and impact assessment, if any, for the projects undertaken by the Company.

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. TITLE

This Policy shall be called the "Corporate Social Responsibility Policy."

2. PREAMBLE

Section 135 of the Act requires the Committee to formulate and recommend to the Board a Corporate Social Responsibility Policy.

3. DEFINITIONS

For the purpose of this Policy the following terms shall have the meanings assigned to them hereunder:

- a) "**Act**" means the Companies Act, 2013, read with the rules thereunder, as amended.
- b) "**Board**" means the board of directors of the Company.
- c) "**Committee**" means the Corporate Social Responsibility Committee.
- d) "**Company**" means Dhaval Packaging Limited.
- e) "**CSR**" means Corporate Social Responsibility.
- f) "**Director**" means a member of the Board.

Words and expressions used and not defined in this Policy shall have the meaning ascribed to them in the SEBI Listing Regulations, the Securities and Exchange Board of India Act, 1992, as amended, the Securities Contracts (Regulation) Act, 1956, as amended, the Depositories Act, 1996, as amended, or the Act.

4. CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

Pursuant to the provisions of section 135 of the Act, the Board of Directors may constitute the corporate social responsibility committee. The members of the committee may be appointed by the Board of Directors of the Company which must consist of at least two or more directors.



5. FUNCTIONS AND POWERS OF CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

To effectively implement the objectives of the Company with respect to CSR, the Committee is vested with the following functions and powers:

- a. 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 of the Companies Act and the rules made thereunder and make any revisions therein as and when decided by the Board;
- b. To identify corporate social responsibility policy partners and corporate social responsibility policy programmes;
- c. To recommend the amount of expenditure to be incurred for the corporate social responsibility activities and the distribution of the same to various corporate social responsibility programmes undertaken by the Company;
- d. To formulate the annual action plan of the Company;
- e. To delegate responsibilities to the corporate social responsibility team and supervise proper execution of all delegated responsibilities;
- f. To review and monitor the implementation of corporate social responsibility policy, corporate social responsibility programmes and issuing necessary directions as required for proper implementation and timely completion of corporate social responsibility programmes; and
- g. To perform such other duties and functions as the Board may require the corporate social responsibility committee to undertake to promote the corporate social responsibility activities of the Company and exercise such other powers as may be conferred upon the CSR Committee in terms of the provisions of Section 135 of the Companies Act, as amended or other applicable laws.

6. VISION

The Company completely endorses reliability. It is committed to conduct business in a true, fair and ethical manner and takes up the responsibility to create a good impact in the society it belongs.

The Company is committed towards improving the quality of lives of people in the communities in which it operates because society is an essential stakeholder and the purpose of its existence. The Company believes that giving back to the society through CSR activities is its moral duty.

The Company aims to fulfil the requirements laid down under the Companies Act, 2013 and act diligently to comply with all its Rules and Regulations on CSR.

7. FOCUS AREAS

The Company may (either independently or in collaboration with other entities) make contribution to one or more implementing agencies which are undertaking any of the following activities under the ambit of CSR:

- i. **Education:** Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly and the differently abled by providing (i) monetary contribution (ii) food, vehicles or technology products.
- ii. **Health Care:** Providing health care for physically challenged, setting up of toilets in villages.



helping anganwadies and facilitating them with basic amenities, setting up old age homes, day care centres and such other facilities for senior citizens.

- iii. **Gender equality:** Setting up homes and hostels for women and orphans and measures for reducing inequalities faced by socially and economically backward groups.
- iv. **Environment Sustainability:** Ensuring environmental sustainability, ecological balance, promotion of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintenance of quality of soil, air and water.
- v. **National Heritage:** Protection of National Heritage, art and culture including restoration of buildings and sites of historical importance, setting up of libraries and promotion and development of traditional arts and handicrafts.
- vi. **Rural Projects:** Training to promote Rural Sports, setting up of Wi-Fi Zones for the local community by supporting Digital India Campaign of the Government of India.
- vii. **Science and Technology:** Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine funded by the Central Government or State Government or Public Sector Undertaking or any agency of Central Government or State Government.
- viii. **Others:** Any other projects, programs and activities falling within the permissible activities prescribed under the CSR Regulations and Schedule VII of the Companies Act, 2013 from time to time.

8. IMPLEMENTATION

We shall strive to implement the aforementioned CSR activities on our own to the extent possible. At the same time we may collaborate with other parties to carry out the activities. This would include:

9. CSR FUNDS

The corpus for the purpose of carrying on the aforesaid activities would include the following:

- 2% of the average Net Profit made by the Company during immediately preceding three Financial Years.
- Any income arising there from.
- Surplus arising out of CSR activities carried out by the company and such surplus will not be part of business profit of the company.

10. MONITORING

The CSR department will provide regular progress report to the CSR Committee of the Board.

This report would indicate:

- Achievement since last progress report / during the last quarter in terms of coverage compared to the target and reasons for variance.
- Achievement of the year-to-date in terms of coverage compared to the target, plans to overcome shortfalls if any and support required from the CSR Committee/Board to overcome the shortfalls.
- Actual year-to-date spends compared to the budget and reasons for variance.



- In respect of activities undertaken through outside Trust/Society/NGO's etc. there will be mechanism of regular reporting of progress on each of the activities and the amount incurred thereon, in line with the requirement of individual projects.
- CSR Committee of the Company, which shall meet twice a year to approve the annual CSR plan/budget, ensure CSR activities being undertaken as per the Board Policy and review the progress of the projects.

11. REVIEW OF POLICY

The CSR Policy will be reviewed every three years or as may be recommended by the CSR Committee of the Company.

