

VALENS MOLECULES PRIVATE LIMITED
(formerly Posh Chemicals Pvt Ltd)

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Preamble

VALENS MOLECULES PRIVATE LIMITED (“Company” or “VALENS ”) strives to be a socially responsible company and strongly believes in the development of society at large. Corporate Social Responsibility (“CSR”) at “Valens ” portrays the deep symbiotic relationship that the Company enjoys with the communities it is engaged with. As a responsible corporate citizen, we try to contribute for social and economic development on regular basis. We believe that to succeed, an organization must maintain highest standards of corporate behaviour towards its employees, consumers and societies in which it operates.

2. Objective

The objective of this Policy is to set guidelines for carrying out CSR activities by the Company. Identify broad areas in which the company will undertake projects and also to set up process for execution, implementation and monitoring of the CSR activities to be undertaken by the Company.

3. CSR Programmes and Projects

The Company proposes to adopt one or more of the following CSR activities as prescribed by applicable laws, including Schedule VII of the Companies Act, 2013, as amended from time to time :

- (i) 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;
- (ii) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the 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 centres 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, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to Clean Ganga Fund set-up by the Central Government .
- (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 recognised sports, Paralympics sports and Olympic sports;
- (viii) contribution to the 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 Scheduled 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; and

(x) rural development projects.

(xi) slum area development - where 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) Such other activities as may be permitted under applicable laws, including Schedule VII of the Companies Act, 2013, as amended from time to time.

4. CSR Committee

a) The CSR policy and programs shall be implemented, managed and supervised by the CSR committee appointed by the Board.

b) The CSR Committee shall comprise at least such number of Directors as is mandatorily required by applicable laws.

5. Role and Responsibilities of the Committee:

The Committee will be responsible for :

- a) formulating the CSR policy in compliance to Section 135 of the Companies Act 2013
- b) identifying activities to be undertaken as per Schedule VII of the Companies Act 2013
- c) recommending to Board the CSR expenditure to be incurred.
- d) recommending to Board, modifications to the CSR policy as and when required
- e) regularly monitoring the implementation of the CSR policy

6. CSR Expenditure

The CSR expenditure shall be recommended by the CSR Committee and subsequently to be approved by the Board of Directors. In case the Company fails to spend the projected amount on CSR activities, the Committee shall obtain from the Board of Directors of the Company, the reasons of such failure and record the same in its meeting

7. Implementation of CSR Activities

a) The Company may undertake CSR activities through registered trust or society or any company, established by the company, under Section 8 of the Act for such non-for-profit objectives.

Provided that the Company can carry out the CSR activities through such other institutes having an established track record of 3 (three) years in undertaking the CSR activities.

b) The Company may collaborate with other companies for undertaking the CSR activities subject to fulfilment of separate reporting requirements as prescribed in the Regulations.

c) The CSR activities shall not include any activities undertaken by the Company in pursuance of normal course of business of the Company.

d) The Company shall not make any payment directly or indirectly to Political Party (ies) for CSR activities.

e) The CSR activities shall be undertaken within the territory of the Republic of India.

8. Tax Treatment

Tax treatment of CSR spent will be in accordance with the Income Tax Act, 1961 as may be notified by Central Board of Direct Taxes (CBDT).

9. Amendments

a) The CSR Committee shall review the CSR Policy from time to time based on the changing needs and make suitable modifications as may be necessary with the approval of the Board.

b) The Company reserves the right to modify, cancel, add, or amend this CSR Policy.

Note:

This Policy will be overall governed by the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014 and any amendments / clarifications / notifications relating to the same issued by the Ministry of Corporate Affairs.