Corporate Social Responsibility Policy

I. Objective:

The objective of this Policy document is to articulate Adjia's core philosophy of social responsibility, to define the areas chosen by Adjia 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**" 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.

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. 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.

V. 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.

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