

Regd. Office : 9-10 GIDC Industrial Estate Waghodia. Dist: Vadodara Gujarat-391760 India.
Ph. # 7574806350 E-Mail : cs@20nano.com

20 MICRONS NANO MINERALS LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

Details of Adoption / Amendments to the Policy				
Policy Adoption / Change effective Date	Clause No.	Particulars of the Adoption / Change	Board Approval Date	Version of Policy
03.05.2022	--	Adoption of Policy	03.05.2022	Original

1. Objective:

The objective of Corporate Social Responsibility Policy ('CSR Policy' or 'Policy' as the context may require) is to lay down guidelines for undertaking Corporate Social Responsibility ('CSR') activities by 20 Microns Nano Minerals Limited ('20M Nano' or 'the Company'). This Policy is formulated in compliance with the requirements of Section 135 of the Companies Act, 2013 read with rules framed thereunder.

2. Philosophy of 20M NANO on CSR:

CSR is not a new term for 20 Microns Group. It has been proactively carrying out CSR activities since more than Fifteen years. It has established 20 Microns Foundation in 2001 for the earthquake affected people. Post-earthquake rehabilitation, continuing the CSR, company thought to focus its activities on a very commonly spread health disease i.e. Diabetes.

3. General:

The Board of Directors (the "Board") of the Company has adopted this Policy at their meeting held on 03rd May, 2022. Any term(s) not defined in the Policy shall have the same meaning as assigned to such term(s) in the Companies Act, 2013 or any other applicable laws or regulations.

4. Effective Date:

This Policy is effective from 03rd May, 2022. This Policy will be subsequently modified and approved by Board of Directors as and when required.

5. Implementation:

- As per the CSR Amednment Rules, 2021 where the amount required to be spent by a company on CSR does not exceed fifty lakh rupees, the requirement for constitution of the CSR Committee is not mandatory and the functions of the CSR Committee, in such cases, shall be discharged by the Board of Directors of the company.

- The Board shall directly or in consultation with implementation agency(ies), identify programs/projects in which the CSR activities which can be undertaken.

- The programs/projects can be undertaken through companies incorporated under Section 8 of the Companies Act, 2013 or a Registered Public Trust or a Registered Society, established by the Company, either singly or along with any other company or by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature.

- The programs/projects can also be undertaken through other companies, Trust(s) / NGO(s) / Implementation Agency(ies) / Local Government Authority(ies) / other(s). The Board may invite such outside expert / consultant or any other person as it may deem fit for the purpose of CSR activities subject to registration under Section 12A and 80G of Income Tax Act, 1961 and having established Track record of atleast 3 years in undertaking similar activities. Entities undertaking

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CSR Activities should have unique CSR Registration Number granted by Ministry of Corporate Affairs.

- CSR activities may also be undertaken in collaboration with other Companies.
- The Board will present, at the beginning of the financial year the amount to be spent on CSR activities during that financial year and Annual Action Plan for –
 - Manner of execution of projects or programmes involving CSR Activities
 - Modalities of utilisation of funds and implementation schedules
 - Monitoring and reporting mechanism
 - Details of need and impact assessment, if any, for the projects
- The Company shall not undertake following as CSR Activity or amount spent shall not consider as CSR Expenditure–
 - Activity undertaken as per normal course of business of the Company
 - Activity undertaken by the company outside India
 - Contribution of any amount directly or indirectly to any political party
 - Activity benefitting employees of the company
 - Activity supported by the company on sponsorship basis for deriving marketing benefits for its products or services
 - Activity carried out for fulfilment of any other statutory obligations
- The Board shall endeavor for CSR capacity building of the personnel of the Company and / or of the institution carrying CSR activities of the Company and Administrative overheads should not exceed 5% of total CSR expenditure of the company for the financial year. “Administrative Overheads” means the expenses incurred by the company for General Management and Administration of CSR functions in the company. But it does not include expenses directly incurred for the particular CSR project or programme.

6. Projects or Programs to be Undertaken / Areas and subjects identified:

The CSR projects or programs or activities to be undertaken by the Company shall be in the areas and subjects specified in Schedule VII of the Companies Act, 2013.

The Board shall from time to time decide/recommend on CSR activities to be undertaken, the geographical area covered, agency(ies) or Trust(s) or NGO(s) with which the projects/programs/activities are to be undertaken, amount to be spent on various projects, whether on going or fresh.

While deciding on the CSR activities, priority shall be given to the needs and requirements of communities or areas around which the Company operates.

The CSR programs or projects or activities that the Company plans to undertake directly or through Trusts or Societies, entities, NGO(s), Implementation Agencies or others and the modalities of execution / implementation of the same.

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The Company can modify or discontinue, entire or partial, annual action plan or on-going project looking to the circumstances and undertake new CSR activity/ies as approved by the Board.

20 Microns Foundation:

The Company will support 20 Microns Foundation in promoting following initiatives through donating in cash required by 20 Microns Foundation:

- a. Helping persons stricken with calamities such as famine, earthquakes, floods, fire, cyclone and such other natural calamity;
- b. Medical relief/maintenance of the sick and disabled and establishment, maintenance and support of or donations to hospital/s, dispensaries, nursing homes and utilization of funds for medical relief and medical research;
- c. Advancement and spread of education including the establishment maintenance and support of free or part free colleges, schools or other educational institutions providing scholarship, research fellowship, fees and prizes;
- d. Relief and help to the aged, blind, lame, mute, deaf and dumb, mentally retarded and orphans and persons otherwise disabled or incapable of earning their livelihoods or any one or more of them and provided aid for their uplift and rehabilitation in life and Society.

The Company shall follow a planned model for CSR activities which are sustainable over long-term and has a direct and/or long term sustainable benefit / impact on the life of the beneficiaries of such programs. The Company may also undertake multiple projects annually, specifically for Diabetic persons.

7. CSR Expenditure:

CSR expenditure shall include all expenditure including contribution to corpus, or on projects or programs related to CSR activities approved by the Board of the Company. It will include contribution to bona fide charitable and other funds. If the company fails to spend CSR amount, the Boards Report shall specify the reasons for not spending the amount and transfer such unspent amount to a Fund specified in Schedule VII, within six months of the expiry of FY.

If the Company undertakes any ongoing Project i.e. multi-year project in fulfilment of its CSR obligation, having timelines not exceeding three years excluding the FY in which it was commenced, any unspent CSR amount for ongoing project, is to be transferred by the company within 30 days from the end of FY to a special account to be opened by the company for that FY called as "Unspent CSR Account".

If CSR amount is spent by a company for creation or acquisition of capital asset, then capital assets should be held by Section 8 company, or Registered Public Trust or Registered Society.

The surplus, if any, arising out of the CSR projects or programs or activities shall not form part of the business profits of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account or such surplus required to be transferred to a Fund

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specified in Schedule VII, within six months of expiry of FY. If company spends in excess of 2% of average Net Profit, then such excess may be set off up to immediate three FY.

8. Monitoring Process:

- The Board shall monitor the above projects, programs, activities and implementation and execution of the same from time to time and report the same to the Board of Directors on a periodical basis.
- The Board shall on completion of every financial year, submit details of the CSR spent during the financial year and reasons for the actual spent being less than the limits prescribed by the law and transferring of unspent amount to the Fund, if any.
- The report on CSR shall form part of Board's Report of the Company.
- The Board shall recommend changes/editions to be carried out in the policy from time to time.

9. Disclosures:

The Company shall disclose this Policy on its website and a web-link thereto shall be provided in the Annual Report of the Company.

10. Amendment:

The Board shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy.