

PITTI INDUSTRIES PRIVATE LIMITED
(Formerly Bagadia Chaitra Industries Private Limited)

POLICY FOR CORPORATE SOCIAL RESPONSIBILITY

The Board of Directors (the "Board") of the Company, has adopted this policy in line with the requirements of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended.

This Policy has been approved by the Board of Directors at their meeting held on August 6, 2025. This policy supersedes the earlier Policy for Corporate Social Responsibility (CSR) of the Company.

The Company should have a CSR policy of its own which fulfils the requirement of section 135 of the Companies Act, 2013 and rules made thereunder including any amendments or modifications as may be introduced from time to time.

The CSR activities undertaken by the Company shall be in line with the CSR activities as enumerated in Schedule VII of the Companies Act, 2013 and shall not include the activities undertaken in pursuance of normal course of business of the Company.

The CSR Committee/Board shall annually formulate the Annual Action Plan which inter alia provides for the list of CSR projects or programmes to be approved and undertaken by the Company, the manner of execution of such projects, the modalities of utilization of funds and monitoring and reporting mechanism for the CSR projects or programmes.

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

Utilization certificate should be obtained from beneficiaries duly certified by a Chartered Accountant.

Constitution of CSR Committee:

In accordance with Section 135(9) of the Companies Act, 2013, the constitution of a CSR Committee is presently not applicable to the Company. Since the amount required to be spent on CSR activities does not exceed ₹50 lakhs, the functions of the CSR Committee shall be discharged by the Board of Directors of the Company.

CSR Expenditure

- a) To ensure that at least 2% of average net profit of last three (03) preceding financial years is spent on CSR activities every financial year.
- b) To ensure that the administrative overheads shall not exceed five percent of the total CSR expenditure of the Company for the financial year.
- c) Any surplus arising out of the CSR activities shall not form part of the business profit of a Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and Annual Action Plan of the

Company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

- d) Where a Company spends an amount in excess of eligible CSR amount, the Company is allowed to set off such excess amount against the requirement to spend the eligible CSR amount up to immediately succeeding three financial years subject to certain conditions as enumerated in the CSR Rules.

Responsibilities of the Board of Directors are as under:

- a) To ensure that at least 2% of average net profit of last three (03) preceding financial years is spent on CSR activities every financial year and shall give preference to the local area and areas around it, where it operates for spending the amount earmarked for Corporate Social Responsibility activities. The CSR projects or programs or activities undertaken in India only shall amount to CSR expenditure.
- b) To approve the CSR Policy and to disclose CSR policy and initiatives in Board's report and Company's website, if any.
- c) To ensure that activities reflected in CSR policy are actually undertaken by the Company.
- d) If the constitution of Corporate Social Responsibility Committee is not applicable to the Company, then the functions of the CSR Committee shall be discharged by the Board of Directors of the Company.
- e) If the Company does not spend 2% of net profits as required, then the Board shall specify the reasons in the Board's report for not spending the CSR amount.
- f) The responsibility of the Board with respect to treatment of unspent CSR amount is as under:

In case of Ongoing CSR Projects:

Any unspent CSR funds of ongoing projects will be transferred within a period of 30 days from the end of the financial year to a special account opened by the Company in any scheduled bank called the "Unspent Corporate Social Responsibility Account." Such amount shall be spent by the Company towards CSR within a period of 3 financial years from the date of such transfer, failing which, the Company shall transfer the same to a fund specified in Schedule VII of the Act, within a period of 30 days from the date of completion of the 3rd financial year.

In case of other than Ongoing CSR Projects:

The unspent CSR amount relating to other than ongoing CSR projects of the Company for the financial year shall be transferred to a designated fund specified under Schedule VII of the Companies Act, 2013 like Swachh Bharat Kosh fund, Clean Ganga Fund, PM CARES Fund or PM National Relief Fund within six months of the expiry of the financial year.

CSR Implementation:

The Board shall ensure that the CSR activities are undertaken by the Company itself or through eligible implementing agencies bearing unique CSR Registration Number issued by Central Government subject to such terms and conditions as provided under rule 4 of the Companies (Corporate Social Responsibility Policy) Rules, 2014.

In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and year wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

Amendment

The Board shall review and may amend this policy from time to time.

Any or all provisions of this policy would be subject to revision / amendment in accordance with the Act and CSR Rules on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment (s), clarification (s) circular(s) etc issued by the relevant authorities, not being consistent with the provisions laid down under this policy, then such amendment (s), clarification (s) circular (s) etc. shall prevail upon the provision hereunder and this policy shall stand amended accordingly.

In the event of any conflict between the provisions of this policy and of the applicable law dealing with the CSR Activities, such applicable law in force from time to time shall prevail over this policy.