

AIMTRON ELECTRONICS LIMITED
Corporate Social Responsibility Policy

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1. Need for Corporate Social Responsibility:

The rules in respect of “Corporate Social Responsibility” (CSR) are enumerated in the Companies (Corporate Social Responsibility Policy) Rules 2014 framed under Section 135 of the Companies Act 2013 and the said Rules shall be applicable from Financial Year 2014-15.

Section 135(5) of the Companies Act, 2013 requires that the Board of Directors of every Company having Net Worth of Rupees 500 Crores or more or Turnover of Rupees 1000 Crore or more or a Net Profit of Rupees 5 Crores or more during the immediately preceding financial year shall ensure that the Company spends, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.

The Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility activities.

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, specify the reasons for not spending the amount.

Explanation: - For the purpose of this section “average net profits” shall be calculated in accordance with the provisions of Section 198.

2. Constitution of Corporate Social Responsibility Committee of the Board:

Keeping in line with section 135 of the Companies Act, 2013 (hereinafter referred to as ‘the Act’), the Board of Directors of the Company formed a Corporate Social Responsibility Committee (hereinafter referred to as the ‘CSR Committee’) on 23rd April, 2025 headed by the Whole time Director of the Company. The Committee will report to Board of Director.

The members of the CSR Committee are as follows:

Sr. No	Name of Director	Designation
1	Mrs. Sharmilaben Lakhanbhai Bambhaniya	Whole-time Director
2	Mr. Nirmal Vasani	Non- Executive Director
3	Mr. Mukesh Vasani	Non- Executive Director
4	Ms. Prerna Bokil	Independent Director

3. Responsibilities:

The CSR Committee shall have following responsibilities:

- To formulate and recommend to the Board, a Corporate Social Responsibility Policy indicating activities to be undertaken as specified in prescribed Schedule VII of the Companies Act, 2013;
- To suggest areas of intervention to the Board of Directors;
- To approve projects that are in the line with CSR policy;
- To recommend the amount of expenditure to be incurred on the activities as referred to in para no. 4;
- To monitor the Corporate Social Responsibility Policy from time to time.
- To ensure that surplus arising out of the CSR activity will not be part of business profits of a Company.

4. Activities:

Only such CSR activities will be taken into consideration as are undertaken within India and only activities which are exclusively for the benefit of employees of the Company or their family members shall not be considered as CSR activity.

The activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013 as amended are as follows:

- i. eradicating hunger, poverty and malnutrition, promoting 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 vocational skills especially among children, women, elderly and 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, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- 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, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- vii. training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
- viii. contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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. (a) 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 the Central Government or State Government;
- x. (b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);
- xi. rural development projects;

- xii. slum area development;
- xiii. disaster management, including relief, rehabilitation and reconstruction activities.

5. Other Provisions:

Where a Company has set up an organization which is registered as a Trust or Section 8 Company, or Society or Foundation or any other form of entity operating within India to facilitate implementation of its CSR activities in accordance with its stated CSR Policy, the following shall apply:

- a. The contributing company would need to specify the projects /programmes to be undertaken by such an organization, for utilizing funds provided by it;
- b. The contributing company shall establish a monitoring mechanism to ensure that the allocation is spent for the intended purpose only;

A Company may also conduct /implement its CSR programmes through Trusts, Societies, or Section 8 Companies operating in India, which is not set up by the Company itself.

Such spends may be included as part of its prescribed CSR spend only if such organizations have an established track record of at least three years in carrying on activities in related areas.

Companies may collaborate or pool resources with other companies to undertake CSR activities and any expenditure incurred on such collaborative efforts would qualify for computing the CSR spending.

Only such CSR activities will be taken into consideration as are undertaken within India.

Company shall report, in the prescribed format as per the Companies Act, 2013, and rules made thereunder including the details of their CSR initiatives in the Directors' Report and in the company's website.

This Policy shall be reviewed by the board every three years.

DISSEMINATION OF THE POLICY

The policy shall be hosted on the website of the Company i.e. <https://www.aimtron.in>

Effective Date: 01/11/2023

Date of Approval by Board of Directors: 01/11/2023

Last Amended by Board of Directors: 23/04/2025