

QUALITY NEEDLES PRIVATE LIMITED

ANNUAL ACTION PLAN OF CSR FOR FINANCIAL YEAR 2023-24

1. Objective:

To fulfill our corporate social responsibility by addressing critical social and environmental issues in alignment with the provisions of the Indian Companies Act, 2013, and CSR Rules, 2014.

2. Focus Areas:

- Health
- Education and Skill building
- Innovation
- Sports

3. List of CSR projects or programmes that are approved to be undertaken: -

The List of Projects to be undertaken shall be as per the list of approved CSR activities in CSR policy of Quality Needles Private Limited (“the Company”) and as per activities specified in Schedule VII of Companies Act, 2013 as amended from time to time.

Further, approximate amount to be spent towards CSR activities for FY 2023-24 is INR 18.68 Million.

4. Manner of execution of projects or programmes:-

The CSR activities as specified in CSR policy of the Company or in Schedule VII of Companies Act, 2013 shall be executed by Company itself or through a Public trust/ Society or Section 8 Company, as defined in Rule 4 (1) of Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021.

Further, any amount remaining unspent under sub-section 135(5) of Companies Act, 2013, unless unspent amount relates to any ongoing project, shall be transferred to the funds specified in Schedule VII of the Act (until a specific “FUND” is prescribed and notified) for the purposes of sub-section (5) and (6) of Section 135 of the Act, within a period of six months from the expiry of the financial year, upon recommendation of CSR Committee and/or approval of the Board of Directors.

In case of ongoing project (as defined in Companies Act, 2013) being under taken, unspent amount shall be transferred by the Company to a separate bank account named “Quality Needles Private Limited - Unspent CSR Account” within a period of thirty days from the end of the financial year and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three 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 (until a specific fund is prescribed and notified), within a period of thirty days from the date of completion of the third financial year, upon recommendation of CSR Committee or approval of the Board of Directors.

5. Modalities of utilization of funds and implementation schedules for the projects or programmes:-

a) Modalities of utilization of funds:

- i. The CSR amount will be spent on CSR activities as per CSR policy and Schedule VII of Companies Act, 2013.
- ii. Fund will be disbursed in phase/tranche wise depending on the nature of the project. On the basis of the expenses incurred & the submission of the relevant supporting of the expenses, i.e. bills, receipts, invoices, bank statements, etc.
- iii. CSR Committee of the Company will collect and maintain the receipts upon amount being spent towards CSR activities.

b) Implementation:

The amount to be spent as per Section 135(5) of the Companies Act, 2013 shall be spent by Company itself by undertaking any/some of the activities specified in CSR policy of the Company or Schedule VII of the Companies Act, 2013 or through:

- (i) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company or
- (ii) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- (iii) any entity established under an Act of Parliament or a State legislature; or
- (iv) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of atleast three years in undertaking similar activities.

Further, the above mentioned entities who intends to undertake any CSR activity, shall provide a CSR registration certificate issued by Ministry of Corporate Affairs containing the unique CSR Registration Number, upon filing of form CSR-1 electronically with the Registrar/ Central Government and also a Registration Certificate under section 12A and 80G of the Income Tax Act, 1961, wherever applicable, before the CSR contribution is made by the entities.

6. Monitoring and Reporting mechanism for the projects or programmes:-

It will be the responsibility of the CSR Committee to monitor periodically the implementation of the projects / programs / activities under this Policy and to ensure compliance of the provisions related to CSR mentioned in the Act and the Rules from time to time. The progress of CSR initiatives and activities will be reported by the CSR Committee to the Board as deemed necessary.

7. Details of need and impact assessment, if any, for the projects undertaken by the company:

As per Rule 8(3) (a) of Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021:-

Every company having average CSR obligation of ten crore rupees or more in pursuance of sub-section (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of its CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

The Company confirms to adhere to the above requirement as and when applicable.