



ASPRI SPIRITS LIMITED
(Formerly known as Aspri Spirits Private Limited)



ASPRI SPIRITS LIMITED
(FORMERLY KNOWN AS ASPRI SPIRITS PRIVATE LIMITED)

CORPORATE SOCIAL RESPONSIBILITY POLICY

Version History

Document Title	Corporate Social Responsibility Policy
Version	1.0
Effective Date	05.12.2025
Document Approved by	Board of Directors



CORPORATE SOCIAL RESPONSIBILITY POLICY

1. INTRODUCTION

Aspri Spirits Limited (“the Company”) believes in integrating its business values and operations to meet the expectations of its stakeholders and the society at large. The Company believes that long-term sustainability can be achieved by meeting legitimate concerns of all stakeholders. The Company’s approach to sustainable development focuses on economic, environmental and social performance.

This Policy shall be called “Corporate Social Responsibility Policy” or “CSR Policy”, which is framed in accordance with the provisions of Section 135 of the Companies Act, 2013 (“the Act”) read with Companies (Corporate Social Responsibility Policy) Rules, 2014 (“CSR Rules”).

This Policy outlines the Company’s philosophy and responsibility and lays down the guidelines and mechanism for undertaking socially useful programmes towards welfare and sustainable development of the community around the area of operations of the Company and other parts of the Country.

2. OBJECTIVE

The main objective of the CSR Policy is to lay down guidelines for the Company to make CSR as one of the key focus areas to adhere to the Company’s global interest in environment and society that focuses on making a positive contribution to society through effective impact and sustainable development programs.

This Policy covers the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities.

3. ROLE OF CSR COMMITTEE

The role of the Corporate Social Responsibility Committee shall be inclusive of the following:

- (a) To formulate and recommend to the board, a corporate social responsibility policy stipulating, amongst others, the guiding principles for selection, implementation and monitoring the activities as well as formulation of the annual action plan which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act and the rules made thereunder, monitor the implementation of the same from time to time and make any revisions therein as and when decided by the Board;
- (b) To identify corporate social responsibility policy partners and corporate social responsibility policy programmes;
- (c) To review and recommend the amount of expenditure to be incurred for the corporate social responsibility activities and the distribution of the same to various corporate social responsibility programmes undertaken by the Company;
- (d) To formulate and recommend to the Board, an annual action plan in pursuance to the Corporate Social Responsibility Policy, which shall include the following, namely:
 - (i) the list of Corporate Social Responsibility projects or programmes that are approved to be undertaken in areas or subjects specified in the Schedule VII of the Companies Act, 2013;
 - (ii) the manner of execution of such projects or programmes as specified in Rule 4 of the Companies (Corporate Social Responsibility Policy) Rules, 2014;



- (iii) the modalities of utilization of funds and implementation schedules for the projects or programmes;
- (iv) monitoring and reporting mechanism for the projects or programmes; and
- (v) details of need and impact assessment, if any, for the projects undertaken by the Company.

Provided that the Board may alter such plan at any time during the financial year, as per the recommendations of the Corporate Social Responsibility Committee, based on the reasonable justification to that effect.

- (e) To delegate responsibilities to the corporate social responsibility team and supervise proper execution of all delegated responsibilities;
- (f) To review and monitor the implementation of corporate social responsibility programmes and issuing necessary directions as required for proper implementation and timely completion of corporate social responsibility programmes; and

To perform such other duties and functions as the Board may require the corporate social responsibility committee to undertake to promote the corporate social responsibility activities of the Company and exercise such other powers as may be conferred upon the CSR Committee in terms of the provisions of Section 135 of the Companies Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 or other applicable law.”

4. ROLE OF BOARD OF DIRECTORS

- (a) After taking into account the recommendations made by the CSR Committee, approve the CSR Policy for the Company.
- (b) Disclose contents of the CSR Policy in its report.
- (c) Ensure that as and to the extent applicable, in each financial year the Company spends at least 2% of the average net profits of the Company made during the three immediately preceding financial years, calculated in accordance with Section 198 of the Act, in pursuance of its CSR policy.

5. SCOPE OF CORPORATE SOCIAL RESPONSIBILITY

In compliance of the Schedule VII of the Companies Act, 2013 and the Company’s Policy any of the below mentioned activities shall be carried out by the Company to contribute towards CSR:

- (a) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- (b) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- (c) 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.
- (d) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and



ASPRI SPIRITS LIMITED
(Formerly known as Aspri Spirits Private Limited)

water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.

- (e) 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 art and handicrafts;
- (f) 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;
- (g) training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports;
- (h) 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 govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- (i) (1) 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; and

(2) 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 Organisation (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).
- (j) rural development projects;
- (k) slum area development;
- (l) disaster management, including relief, rehabilitation and reconstruction activities.

The above list is illustrative and not exhaustive. The CSR Committee/ Board of Directors is authorized to consider CSR activities which are not included in this list.

It is clarified that, all the aforesaid activities or programs shall be undertaken in India only, and also that such programs and activities shall not be designed to benefit only the employees of the Company and their families.



6. FUNDING AND ALLOCATION

For achieving its CSR objectives, the Company shall allocate such amount of its average Net Profits as may be approved by the CSR Committee/ Board of Directors, as its Annual CSR Budget in each Financial Year.

Allocation of the Annual Budget for CSR activities in any given year shall be as per the provisions of the Companies Act, 2013 and rules made thereof as amended from time to time.

7. IMPLEMENTATION

CSR programs of the Company shall be implemented through following methods:

- (a) directly by the Company; or
- (b) through an Agency; or
- (c) in collaboration with other companies.

8. MONITORING

To ensure effective implementation of the CSR programs undertaken by the Company, a monitoring mechanism will be put in place. The progress of CSR programs undertaken will be reported by the Committee to the Board of Directors periodically and the Board shall review the progress of activities.

9. SET-OFF EXCESS CSR SPENT

Any amount which has been spent in excess of the requirements, such excess amounts may be set off against the requirements to spend upto immediate succeeding three financial years subject to conditions that:

- i. The excess amount available for set off shall not include the surplus arising out of CSR activities; and
- ii. The Board of the Company shall pass a resolution to this effect.

10. TRANSFER OF UNSPENT CSR AMOUNT

The unspent CSR amount, if any, shall be transferred by the Company to any fund included in Schedule VII of the Act or as may be specified from time to time.

11. DISCLOSURE/ REPORTING

The Board Report shall include an annual reporting on CSR activity in the format prescribed under the Rules. The composition of CSR Committee, CSR Policy and Projects approved by the Board shall be displayed on the Company's website.



12. IMPACT ASSESSMENT

Impact assessment, if and when applicable shall be undertaken by an independent agency and such impact assessment report shall be placed before the Board and annexed to the annual report of CSR.

13. MISCELLANEOUS

In case of any doubt with regard to any provision(s) of the policy, a reference can be made to the Board of Directors. In all such matters, the interpretation and decision of the Board of Directors shall be final.

The CSR Committee shall have the right to make recommendations to the Board with regards to any revision/ amendment in any or all provisions of the CSR Policy in accordance with the guidelines as may be issued by the Ministry of Corporate Affairs or Government, from time to time.

---- O ----