

Corporate Social Responsibility (CSR)

Preamble

This policy outlines the Company's philosophy and commitment as a responsible corporate citizen. It sets forth the framework, principles, and mechanisms for identifying, implementing, and monitoring socially beneficial and sustainable development programs for the welfare of the community at large.

This document, titled "**Corporate Social Responsibility Policy**" (**CSR Policy**), reflects the approach and direction approved by the Board of Directors of the Company, based on the recommendations of its CSR Committee. It also establishes the guiding principles for the selection, execution, and oversight of CSR activities, including formulation of the annual action plan.

Vision

Our vision is "To actively contribute to the social and economic development of the communities in which we operate."

In pursuit of this vision, we aim to build a better and more sustainable quality of life for the weaker and marginalized sections of society, thereby contributing to an improved Human Development Index of the nation.

In alignment with this vision, **Thakkers**, through its CSR initiatives, seeks to create long-term value for society and the environment, promoting inclusive growth and sustainable development.

Our Board of Directors, Senior Management, and all employees subscribe to a philosophy of compassionate care and social responsibility. We believe in building a society that benefits all — a philosophy rooted in empathy, generosity, and shared growth. This ethos forms the cornerstone of our CSR Policy.

Key Definitions

"**CSR Policy**" refers to this document, which sets out the approach and direction approved by the Board of Directors, taking into account the recommendations of the CSR Committee, in line with the provisions of Section 135 of the Companies Act, 2013 and the rules made thereunder, as amended from time to time.

"**Ongoing Project**" means a multi-year CSR project undertaken by the Company with a timeline not exceeding three years, excluding the year of commencement. It also includes any project initially approved for less than a year but subsequently extended by the Board based on reasonable justification.

"**Corporate Social Responsibility (CSR)**" refers to activities undertaken by the Company in pursuance of its statutory obligations under Section 135 of the Companies Act, 2013 and the Companies (CSR Policy) Rules, 2014, but does **not** include:

- i. Activities undertaken in the normal course of business of the Company;
- ii. Activities outside India (except training of Indian sportspersons representing the country or any state/UT at national/international levels);

- iii. Contributions to political parties under Section 182 of the Companies Act, 2013;
- iv. Activities benefiting only the Company's employees as defined in Section 2(k) of the Code on Wages, 2019;
- v. Sponsorship-based activities undertaken for marketing or brand promotion purposes; and
- vi. Activities undertaken solely for compliance with other statutory obligations.

CSR Activities

The Company shall undertake CSR activities in accordance with applicable laws, focusing on the following priority areas specified in **Schedule VII of the Companies Act, 2013**, including but not limited to:

- Eradicating hunger, poverty, and malnutrition; promoting healthcare (including preventive health care and sanitation); and providing safe drinking water.
- Promoting education, including special education, vocational skills, and livelihood enhancement projects, particularly for children, women, the elderly, and persons with disabilities.
- Promoting gender equality, empowering women, supporting old-age homes, orphanages, and day care centers, and reducing inequalities faced by socially and economically backward groups.
- Ensuring environmental sustainability, ecological balance, conservation of natural resources, and maintaining quality of air, soil, and water.
- Protecting national heritage, art, and culture, including restoration of heritage sites, and promoting traditional arts and handicrafts.
- Welfare measures for armed forces veterans, war widows, and their dependents, including personnel from CAPF and CPMF.
- Promoting rural and national sports, including Olympic and Paralympic sports.
- Contributions to government relief funds such as PM National Relief Fund or PM CARES Fund.
- Contributions to research and development initiatives and incubators in science, technology, engineering, and medicine.
- Rural development projects and slum area development.
- Disaster management, including relief, rehabilitation, and reconstruction.
- Any other activity as may be specified in Schedule VII from time to time.

Preference shall be given to CSR initiatives undertaken in and around the areas where the Company operates.

CSR Committee

In accordance with Section 135 of the Companies Act, 2013, the Board of Directors has constituted a **Corporate Social Responsibility Committee** (CSR Committee) comprising the following members (effective October 1, 2025):

Mrs. Poonam Thakker	Executive Director	Chairman
Mr. Jitendra Thakker	Executive Director	Member
Mr. Chandrakant Patel	Non-Executive Independent Director	Member

Functions and Powers of the CSR Committee

The CSR Committee shall be responsible for formulating, recommending, and overseeing the Company's CSR strategy and initiatives. Its functions include:

1. Recommending CSR activities and annual action plans to the Board in line with the Companies Act, 2013 and CSR Rules.
2. Identifying and prioritizing CSR projects, defining measurable targets and timelines.
3. Recommending the annual CSR budget to the Board.
4. Monitoring implementation and reviewing progress of CSR projects periodically.
5. Establishing a transparent system for tracking and reporting CSR performance.
6. Submitting periodic reports to the Board on CSR activities.
7. Recommending revisions or improvements to CSR policy and strategy as necessary.
8. Ensuring preparation and approval of the **Annual Action Plan**, covering:
 - List of approved projects/programs under Schedule VII;
 - Execution methodology;
 - Fund utilization and implementation schedule;
 - Monitoring and reporting mechanism; and
 - Need and impact assessment details, where applicable.

Manner of Implementation

1. CSR activities may be identified through internal assessments, community representations, or requests from government bodies or NGOs.
2. CSR initiatives may be implemented:
 - Directly by the Company, **or**
 - Through registered implementation agencies with a valid CSR Registration Number, such as:
 - A Section 8 company, trust, or society established by the Company;
 - A Section 8 company, trust, or society established by the Central/State Government;
 - A registered entity with at least three years of track record in similar CSR activities; or
 - Any entity established under an Act of Parliament or State Legislature.
3. Due diligence shall be conducted before selecting an implementation agency.
4. The Company may engage international organizations for CSR design, monitoring, or evaluation, and for capacity building.

CSR Budget

1. The CSR budget shall be determined in accordance with the provisions of Section 135 of the Companies Act, 2013 and related Rules.
2. Allocation of funds to specific focus areas shall be recommended by the CSR Committee and approved by the Board.
3. A dedicated CSR team will oversee execution, fund allocation, monitoring, and reporting.
4. The Chief Financial Officer (CFO) or the person responsible for financial management shall certify that CSR funds have been utilized for approved purposes.
5. Ongoing projects shall be monitored regularly, and modifications, if any, may be approved by the CSR Committee.

6. If the Company's average CSR obligation over the last three financial years is INR 10 crore or more, impact assessments shall be conducted by an independent external agency for projects exceeding INR 1 crore in value.

Monitoring

1. The CSR Team shall monitor implementation and progress through site visits, reviews, and periodic reports.
2. Transparent mechanisms will be developed to track project performance, ensuring effective and accountable use of CSR funds.

Reporting

1. An annual CSR report shall be included in the Board's Report in the format prescribed under Section 135 of the Companies Act, 2013.
2. The CSR Committee shall submit a responsibility statement to the Board affirming compliance with the approved CSR Policy.
3. This Policy applies to all CSR projects undertaken by the Company and shall be reviewed periodically to ensure alignment with legislative amendments and best practices.
4. The Board may amend this Policy based on recommendations of the CSR Committee or to reflect updated government guidelines.
5. The approved CSR Policy, composition of the CSR Committee, and approved CSR projects shall be disclosed on the Company's website and updated as required.

The Committee has been re-constituted by the Board of Directors at its meeting held on October 01, 2025