

## **TROIKAA PHARMACEUTICALS LIMITED**

### **Corporate Social Responsibility Policy**

Real progress occurs when privileges are balanced with the responsibilities towards society. Troikaa has always laid emphasis on progress with a social commitment. We believe strongly in our core values of empowerment and betterment of not only the employees but also our communities. Following this principle, the company has developed a comprehensive approach towards promoting and facilitating various aspects of our surrounding communities.,

#### **(1) CSR Objective:**

The objective of the company's CSR Policy is to frame guiding principles for identifying, execution and monitoring of CSR activities, its review from time to time, taking necessary corrective actions and reporting of the CSR activities to CSR Committee/Board of Directors.

CSR activities may be implemented by the Company:

- a. on its own and/or
- b. through a Trust formed by the promoters of the Company and/or
- c. through an external trust or any another NGO or agency conducting CSR activities in synchronization with CSR activities of the Company.

In case of activities implemented through Trust/NGOs or any other similar agency, it should have track record of three years in undertaking similar programs or projects.

#### **(3) CSR activities:**

The Company's manufacturing facilities are situated at Thol, Dist. - Mehsana – 382728, Gujarat State, at Selaqui, Dehradun and third manufacturing facility is under implementation stage located near Virochannagar, Sanand, Ahmedabad. As such its CSR activities will be executed in the State of Gujarat and Uttarakhand. The areas of operations for CSR activities shall generally be in the nearby areas of village of Thol, Dehradun and Virochannagar, which is proposed site for the new manufacturing unit, district of Ahmedabad and its surrounding areas in the state of Gujarat. However, any other areas may also be covered if the CSR Committee thinks it appropriate and approves the same.

The CSR activities of the Company will be implemented in accordance with the following core values:

- Proactively engage with the relevant stakeholders, understand their concerns and be responsive to their needs

- Use and promote systematic processes to engage with the stakeholders and endeavor to address their issues in just, fair and equitable manner.
- Channelizing resources and efforts towards making positive and sustainable contribution in social and economic development
- Aligning CSR practices and programs to complement and support the developmental priorities at local, state and national levels

The activities to be undertaken by the Company as CSR activities shall be the projects/programs relating to the activities/subjects specified and enumerated in Schedule VII of the Companies Act, 2013 or any amendment thereto or modification thereof. However, at present, it proposes to undertake the relevant activities on priority basis in following areas.

**A. Promoting Education including special education and Knowledge enhancement, including but not limited to:**

1. Facilitating enhancement of knowledge and innovation in the educational Institutes.
2. Providing financial and/or other assistance to the needy and/or deserving students.
3. Distributing awards and rewards to encourage innovative thinking among students at scholastic level and to continue such activities for a longer period as a part of CSR project instead of being engaged in one-off events.
4. Providing financial assistance to any agency involved in education and knowledge enhancements for improving the infrastructure facilities and strengthening academic activities.

**B. Promoting health care including preventive health care, sanitation and hygiene, including but not limited to:**

1. Providing financial and/or other assistance to the agencies involved in exclusive medical research, public health etc.
2. Providing financial assistance to deserving people for specialized medical treatment in any medical institution
3. Activities concerning or promoting:
  - a. General healthcare including preventive healthcare
  - b. Health/medical camps
  - c. Distribution of medicines (whether or not manufactured by the Company) to the needy patients
  - d. Hygiene, cleanliness and sanitation
  - e. Adequate water supply for drinking and other domestic purpose

**C. Any other activity which the Committee may deem appropriate.**

#### **(4) CSR Committee and its Responsibility:**

The primary responsibility for carrying out the CSR activities will be on CSR Committee/Board of Directors of the company. The Corporate Social Responsibility Committee of the Board is consisting of four directors including one independent director as follows:

(1) Mr. Prakash Shah, Chairman

(2) Smt. Sushma Patel, Member

(3) Smt. Binita Patel, Member

(4) Mr. Padmin Buch, Member

The CSR committee will look after all the projects in close proximity and active support from all the functional units of Troikaa Pharmaceuticals Ltd. The committee will be responsible for:

- Formulating transparent procedures for selection of projects.
- Monitoring and timely implementation of the projects.
- Recommendation of budget before the board for various CSR projects.
- Maintaining the report of all the projects.

#### **(5) Allocation of funds: (Modalities of utilization of funds)**

1. The Company, in every Financial Year, shall endeavor to spend such feasible amount as CSR Expenditure, which shall not be restricted by the statutory limit of a specified percentage of its average net profits of the three immediately preceding Financial Years.
2. Total expenditure in the CSR Annual Plan shall be approved by the Board upon recommendation by the CSR Committee
3. In case the Company fails to spend the statutory minimum limit of 2% of the Company's average net profits of the immediately preceding three years, in any given financial year, the Board shall specify the reason for the same in its report in terms of clause (o) of sub-section (3) of section 134 of the Act.
4. The CSR Committee will spend funds on the CSR activities or programme or projects as may be approved by the CSR Committee and/ by the Board of Directors and/or donate funds to the "**RAJNIBHAI V. PATEL TRUST**" and other welfare trusts or NGOs operational in the CSR activities as specified by the Companies Act, 2013 and rules made there under.

**(6) Monitoring and Review of CSR projects/activities:**

All CSR activities shall be monitored by the CSR Committee on regular basis. The Review discussions shall be held among the Committee members and/CSR execution team and other participants for further improvement. Feedback will be obtained from the local representatives to ensure that benefits of such activities should reach to the local community, the same will also be measured against targets and budgets and wherever necessary, midcourse corrections will be affected.

**(7) Policy documents to be referred for implementation of CSR activities.**

(a) CSR policy of **M/s. TROIKAA PHARMACEUTICALS LIMITED**

(b) Provisions of the Companies Act, 2013 relating to CSR and rules made there under.

(c) Any subsequent notification / circular / amendments / modification / revision / addendum to the aforesaid acts and rules issued by the Ministry of Corporate Affairs, Govt. of India.

**(8) Surplus out of CSR Activities.**

The surplus arising out of the CSR activities, if any shall not form part of the business profit of the company.

**(9) General:**

(a) The company reserves the right to modify, cancel, add or amend any of the above activities/rules/guidelines within the broad parameters of the provisions of Companies Act, 2013 and rules made there under.

(b) In case of any doubt with regard to any of the provisions of the policy and also in respect of any matters not covered therein, the interpretation and decision of the Chairman of the CSR Committee/ Board of Directors shall be final.

**(10) Management Commitment**

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.