

THEMIS CSR POLICY

1. CSR VISION STATEMENT & OBJECTIVES:

1.1 VISION STATEMENT

THEMIS, through its CSR activities, wishes to initiate and continue value creation in the society and the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth for the society and community, in fulfillment of its role as a Socially Responsible Corporate.

1.2. OBJECTIVES:

To maneuver activities of the organization with available resources to take programmes that benefits the communities in and around its work locations and enhance, the quality of life, environment and economic well being of local populace in accordance with Schedule VII of the Companies Act, 2013 ("Act") read with the Companies (Corporate Social Responsibility Policy) rules, 2014 ("Rules")

2. COMPOSITION OF CSR COMMITTEE OF THE BOARD:

2.1. The composition of the CSR Committee is as under:

- Mr. Humayun Dhanrajgir, (Chairman)
- Mr. H. Subramaniam, (Member)
- Dr. Sachin D. Patel, (Member)

2.2. The changes if any, in the Composition of CSR Committee of the Board shall be notified from time to time, as per the provisions of Section 135 of the Companies Act, 2013.

3. RESPONSIBILITIES OF THE COMMITTEE:

Formulate and update the CSR Policy, which will be approved by the Board of THEMIS

- Suggest areas of intervention to the Board of THEMIS
- Approve projects that are in line with the CSR policy
- Put monitoring mechanisms in place to track the progress of each project.
- Recommend the CSR expenditure to the Board of THEMIS who will approve it
- Constitute an execution & administration Committee for CSR Activities
- Meet at least twice a year to review the progress made.

4. CSR ACTIVITIES/PROJECTS/PROGRAMMES EXECUTION:

4.1 CSR Programmes will be undertaken at various work locations of THEMIS within defined ambit of Schedule VII of the Companies Act, 2013.

The Company presently operates at Mumbai, Vapi, Hyderabad and Haridwar. Hence, the Committee will strive to make CSR activities at these locations.

4.2 Majority of the CSR programmes will be implemented in and around the 'local areas'. However, in special case any project can be taken up anywhere in the country, as per the company requirement/imperatives from time to time.

4.3 CSR activities may be undertaken through various agencies including registered trusts/ societies or companies or autonomous bodies/government departments. In case of NGOs/Trust/Pvt. Companies, an established track record of 03 years in undertaking similar projects or programs would be essential, as decided by the Committee from time to time.

5. CSR EXPENDITURE:

For achieving its CSR objectives through implementation of meaningful & sustainable CSR Projects or Programmes, THEMIS will spend every year as applicable 2% of the Average Net Profit for the immediately three preceding financial years (Net Profit to be calculated as per the provisions of Section 198 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) rules, 2014 ("Rules")) The unspent CSR amount in a particular year would not lapse. It would instead be carried forward to the next year for utilization for CSR activities only.

6. IMPLEMENTATION, MONITORING & REPORTING:

6.1 To ensure effective execution, transparency and implementation of the CSR programmes undertaken at working place, the committee may constitute a separate Committee at the HO.

6.2 such Committee will submit a report along with documentary evidence including photographs, films or videos to the CSR Committee, who will monitor programmes or activities and report the same to Board of Directors of the Company.

6.3 An Annual Report on CSR containing details about the CSR Policy and programmes implemented by THEMIS shall be included in the Board of Director's Report for every financial year, as per format prescribed by the provisions of Rules of Section 135 of the Companies Act, 2013.

6.4 Composition of the THEMIS CSR Committee will be included in the Annual Report on CSR and also displayed on the THEMIS website.

6.5 If for some reason, THEMIS fails to spend 2% of the Avg. Net Profit of the preceding three FYs on CSR, the reasons thereof, shall be furnished in the report of the Board of Directors under Section 134 (3) (o) of the Companies Act, 2013.
