

**Corporate Social Responsibility Policy
of
Eco Recycling Limited**

A. Context:

Being a leading e-waste recycling service provider in India, the Company endeavors to transform lives of all its stakeholders financially and socially by becoming a sustainable corporate citizen. The Company through this policy strives to enrich society, both materially and socially while contributing towards social upliftment and preservation of the global environment.

B. Company's Objectives and Philosophy:

Our commitment is to improve the management of our Company every day to make it increasingly sustainable.

We are committed to: -

- Getting involved in the community and social fabric of geographies wherein we operate and work towards community development and social upliftment by promoting social business projects and providing aid wherever possible.
- Minimising environmental impact and being more efficient in consuming resources, prioritising reduction and reuse through E-waste recycling, preserving the environment of the natural areas where there is infrastructure we manage and using the best available technologies that are economically viable so that our activities and services are environmentally more efficient by undertaking renewable energy projects.
- Providing added value for shareholders by managing financial resources efficiently with criteria of profitability and value creation and offering transparent information to all relevant stakeholders.
- Providing employees and members of society, equality of opportunity and nondiscrimination because of gender, religion, country of origin, age, disability or sexual orientation in all areas; applying the necessary measures to ensure health and safety in all workplaces and guaranteeing respect for human rights, rejecting force or compulsory labour through disaster relief programmes, road safety initiatives.
- Satisfying customers by offering quality services adapted to their needs coupled with providing consumer protection services.
- Prioritising relations with suppliers and contracted companies incorporating sustainability criteria in each action.

C. Regulatory Framework:

The Companies Act, 2013 (the Act) together with the rules notified under and Schedule VII of the Act and circular(s) and notification(s) issued by the Ministry of Corporate Affairs (MCA), from time to time, provides a framework for companies to define the focus areas in the CSR space. The law also guides companies to apply the scope as defined under Schedule VII of the Act liberally to follow the law in letter and spirit. Further, the Act also provides instruments on agencies eligible for implementation through which the companies spend its CSR expenditure. Eco's CSR Policy, focus area and the implementing agencies shall therefore remain within the boundary set by the law. The provisions herein shall be read in consonance with the Act.

D. Focus Areas:

As a responsible corporate citizen, the Company is committed to sustainable development and inclusive growth and has been focusing on a wide range of issues in relation to ewaste management, skill development, education, ensuring environmental sustainability and development projects.

The Company has following focus areas for undertaking its CSR activities:

S. No.	Focus Areas	Details
1	Environmental Sustainability and development projects	Safeguarding the environment by mitigating the hazardous effects of improper disposal or electronic waste, environmental protection, community empowerment and economic sustainability
2	Skill Development, Entrepreneurship Development and Education	Promoting and enhancing alternative livelihoods, skill development including employment, enhancing vocational skills, entrepreneurship development in skilling and value chains. Promoting education through social education and developing infrastructure of schools, etc.

While the Company will primarily engage in the CSR activities specified in the aforesaid focus areas, the Company can support or undertake any of the following activities as per Schedule VII of the Act, as amended, attached as Annexure A. The list is illustrative and must be interpreted liberally to capture the essence of the subjects enumerated above.

The CSR Policy issued pursuant to the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time has been recommended by the CSR Committee of the Board and adopted by the Board. It can be downloaded from our website – <https://www.ecoreco.com/investors-overview/>.

E. Surplus from the CSR Activities:

The CSR activities undertaken/to be undertaken by the Company are not expected to lead to any additional surplus. However, if any additional surplus is generated, it would be dealt in compliance with the provisions of the Act.

F. Governance Mechanism:

We follow structured governance procedures which comprise of a 2 (two) tier governance mechanism to monitor CSR activities.

I. Board of Directors:

The Board monitors and reviews the performance and impact of the CSR programmes, provides input and guidance and satisfies itself that the CSR funds so disbursed are aligned to the CSR Policy of the Company and have been utilized for the purpose and in the manner so approved by it. Further, the Board of the Company, upon recommendation of the CSR Committee, may proceed to commence any ongoing projects or classify an existing project as an ongoing project in the circumstances beyond the Company's control. If the required amount to be spent by the Company may not be expended in its entirety in the relevant financial year, the Company shall

ensure due compliance with the necessary provisions under the Act including reclassification of the project as ongoing project. Ongoing project(s) shall have the same meaning as provided under the Act read with rules.

Chief Financial Officer (CFO) of the Company shall certify that the CSR funds so disbursed have been utilized for the purposes and in the manner approved by the Board.

II. CSR Committee of the Board:

The CSR Committee provides oversight and guidance on CSR performance and monitors compliance with the CSR Policy, commitments and the applicable provisions and if required make necessary recommendations to the Board, from time to time. The role and responsibilities of CSR Committee shall be as set out in the Act and the terms of reference of CSR Committee.

- G.** Guidance with respect to CSR Obligation, Selection, Implementation and Monitoring of CSR activities is attached as Annexure B.

H. Limitation and Amendment:

The Board of the Company may in their discretion and on recommendation of the CSR Committee, make any changes/modifications and/or amendments to this Policy from time to time. In the event of any conflict between the provisions of this Policy and statutory requirements, law shall prevail over and automatically be applicable to this Policy. In the event of any amendment to the Act, this Policy shall be deemed to have been amended accordingly.

I. Ecoreco Foundation

The Company has a Trust registered under The Bombay Trusts Act, 1950 to undertake its CSR activities. The Company will be carrying out various CSR activities through its Foundation. Major of its initiatives will include promoting various e-waste management vocational trainings.

Annexure A

List of activities as per Schedule VII of the Act

- i. eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- ii. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- iii. 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;
- iv. ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga;
- v. 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 arts and handicrafts;
- vi. measure for the benefit of armed force veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- vii. training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sports;
- viii. contribution to the Prime Minister's National Relief Fund or Prime Minister's Central Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women;
- ix. (a) 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

(b) 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).
- x. rural development projects.
- xi. slum area development.
- xii. disaster management, including relief, rehabilitation and reconstruction activities.

Guidance with respect to CSR Obligations, Selection, Implementation and Monitoring of Activities:

a. CSR Obligation:

ERL is committed to spend 2% of its average net profits made during the 3 (three) immediately preceding financial years. The overall amount to be committed towards CSR will be approved by the Board, upon recommendation of the CSR Committee, as a part of its Annual Action Plan. Further, based on reasonable justification, the Board of the Company can alter the Annual Action Plan at any time based on the recommendation of the CSR Committee.

b. Unspent Amount on CSR Activities:

The Company endeavors to fulfill its CSR obligations in a timely manner. However, in the circumstances beyond the Company's control, if the required amount to be spent by the Company may not be expended in its entirety in the relevant financial year, the Company shall ensure due compliance with the necessary provisions under the Act including reclassification of the project as ongoing project.

c. Acquisition of capital assets:

For ensuring that the CSR projects/initiatives of the Company, inter alia, environmental sustainability projects/initiatives are fulfilled with a positive social and economic impact on the community at large, the capital-intensive spending for creation of assets is vital. If CSR contribution made for creation or acquisition of a capital asset in pursuance of its CSR projects/initiatives, the same shall be held in the manner prescribed under the Act.

d. Selection:

i. Selection of CSR projects

Any of the following factors can be taken into consideration:

- (a) Alignment of the projects with the focus area specified in this CSR Policy;
- (b) Impact on the society/community at large and the environment;
- (c) Inclusive growth;
- (d) Sustainability of the projects to ensure long term impact;
- (e) Timeframe within which the Project and the impact on them;
- (f) Key beneficiaries of the project and the impact on them; and
- (g) Availability of an exit option

ii. Selection of implementing agency/PIA

The CSR activities can be undertaken either directly or through implementing agency. The implementing agency shall meet the statutory eligibility criteria laid down under the Act. Additionally, the Company shall conduct appropriate due diligence before associating with them. Such due diligence may inter alia cover aspects of:

- (a) Financial position and credibility;
- (b) History and experience in the relevant area or similar activity;
- (c) Availability of necessary statutory registration;
- (d) Governance and management standards of the agency;
- (e) Any political connections or dubious affiliations of the agency;
- (f) Any potential conflict of interest; and
- (g) Existing and past litigations

e. Implementation of CSR activities

The CSR activities will be undertaken by the Company either directly or indirectly or implementing agency. Further, the Company may enter Memorandum of Understanding (MoU) with the implementing agencies setting out clear terms and conditions to enable completion of projects in the most efficient manner.

f. Monitoring of CSR activities

The CSR activities of the Company will be duly monitored. The monitoring process adopted by the Company may include obtaining of reports of different kind, self0declaration, On-site visit, pictures or videos of projects sites, etc. Further, the monitoring process may involve (i) periodic reporting; and (ii) periodic review and assurance visits of the CSR projects:

- (I) Periodic reporting : The implementing agency/PIA will be required to submit project fund utilization statement on a periodic basis and the audited financial statement, utilization statement, etc. on a yearly basis
- (II) Periodic review and assurance visits: ERL will be permitted to undertake field visits, review calls, conduct independent assurance or evaluation visits to assess the project implementation including key milestones or key performance indicator, fund utilization and usage of capital assets, etc.

Notwithstanding the aforesaid, ERL may determine any specific review and reporting requirement including third party audits or evaluation by external agencies depending on the nature of implementing agency/PIA and the project involved. Further, the impact assessment shall be conducted for eligible CSR projects or programs as mentioned under the Act.

g. Annual Action Plan

All the guiding principles as required to be followed for implementing and monitoring the CSR Activities shall also be followed while formulating the Annual Action Plan. The Annual Action Plan shall be simple, action oriented, measurable, relevant and time bound.

h. Disclosure and Transparency

CSR Policy, composition of the CSR Committee and the projects approved by the Board are displayed on the website of the Company which can be accessed at link <https://www.ecoreco.com/investors-overview/>.

ECO RECYCLING LIMITED

COMPOSITION OF CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

Sr. No.	Name of the Director	Category	Designation in the Committee
1	Mr. Dattatraya Devale	Independent Director	Chairman
2	Mr. Giriraj Bhattar	Independent Director	Member
3	Mr. Brijkishor Kishangopal Soni	Managing Director	Member

Key CSR Projects approved by the Board for FY 2023-24

Title of the Project	Circular Catalyst Campaign
Project Duration	3 years

Sr. No.	Ecoreco Initiative	Details
1	Environmental Sustainability and development projects	<p>To advocate and create awareness in the area of e-waste management, the Company has partnered with Ecoreco Foundation.</p> <p>Company has initiated an 'I don't waste' campaign by installing E-Bins to create awareness and drive behavior change on e-waste segregation and recycling among school children in partnership with Ecoreco Foundation.</p> <p>The Foundation will also setup end-to-end waste management projects in Mumbai, including collection, segregation, recycling and driving behaviour change.</p> <p>The Company also aims to improve the lives of waste pickers by enabling their access to e-waste .</p>
2	Skill Development, Entrepreneurship Development and Education	<p>Promoting and enhancing alternative livelihoods, skill development including employment, enhancing vocational skills, entrepreneurship development in skilling and value chains.</p> <p>Promoting education through social education and developing infrastructure of schools, etc.</p>