



Polar Auto and Engineering Industries Private Limited

Corporate Social Responsibility Policy

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1. Objective of the CSR Policy

This Corporate Social Responsibility (“CSR”) Policy sets out the approach of Polar Auto and Engineering Industries Private Limited (“the Company”) towards its social responsibility initiatives. The objective of this Policy is to establish a structured and unified approach to CSR across the Company by identifying select causes to work with, thereby ensuring meaningful and sustained social impact, in compliance with Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time (“the Rules”).

2. Scope and Applicability

This Policy is applicable across Polar Auto and Engineering Industries Private Limited.

3. CSR Approach and Guiding Principles

As a company engaged in the auto components and engineering sector, the Company's CSR vision is to focus its efforts within the communities and constituencies in which it operates, with a particular emphasis on education, skill development, health, and environmental sustainability, while encouraging the use of technology and innovation to maximise impact.

All CSR projects undertaken by the Company will be aligned with this CSR vision and with the activities listed in Schedule VII of the Companies Act, 2013. CSR projects will ordinarily be undertaken in India.

The Company's CSR activities will not include:

- Activities undertaken in the normal course of business of the Company;
- Projects or programmes that benefit only the employees of the Company, as defined in clause (k) of Section 2 of the Code on Wages, 2019, and their families;
- Contribution of any amount, directly or indirectly, to any political party;
- Activities supported on a sponsorship basis for deriving marketing benefits for the Company's products or services; and
- Activities undertaken to fulfil any other statutory obligation under any law in force in India.

All CSR activities will be undertaken in project mode. An illustrative list of CSR projects/programmes to be undertaken by the Company is set out at Annexure 1, which will be updated from time to time on the recommendation of the CSR Committee and approval of the Board.

4. Total Outlay

In accordance with Section 135 of the Companies Act, 2013, the Company shall spend, in every financial year in which the applicability thresholds under Section 135(1) are met, at least 2% of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this Policy. For this



purpose, the net profit and average net profit shall be computed in accordance with Section 198 of the Act, read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

The Company may spend up to 5% of the total CSR expenditure in a financial year on administrative overheads relating to the general management and administration of its CSR functions.

Any surplus arising out of CSR activities shall not form part of the business profits of the Company. Such surplus shall be ploughed back into the same project, or transferred to the Unspent CSR Account of the Company, or transferred to a fund specified in Schedule VII of the Act, in each case within the timelines and in the manner prescribed under the Act and the Rules.

Any unspent CSR amount, other than an amount relating to an ongoing project, shall be transferred to a fund specified in Schedule VII within six months of the expiry of the financial year. Unspent amounts relating to ongoing projects shall be transferred, within 30 days from the end of the financial year, to a special account to be opened by the Company in a scheduled bank, to be called the “Unspent Corporate Social Responsibility Account”, and shall be spent by the Company towards CSR within three financial years from the date of transfer, failing which the Company shall transfer the unspent amount to a fund specified in Schedule VII within 30 days of the expiry of the third financial year.

5. Implementation

The CSR Committee shall ensure that the CSR budget is invested in projects that create long-term and high-impact outcomes for the identified focus areas, while also supporting the local needs of the communities in which the Company operates.

CSR initiatives may be implemented directly by the Company or through implementing partners, being a company established under Section 8 of the Act, a registered public trust, or a registered society, having an established track record of at least three years in undertaking similar activities. Such implementing partners must be registered and hold a valid registration under Sections 12A and 80G of the Income Tax Act, 1961, and must have registered with the Central Government by filing Form CSR-1 with the Registrar, as required under the Rules.

The Company may engage international organisations, as defined under the Rules, for designing, monitoring, and evaluating CSR projects, and for capacity building of personnel involved in CSR activities.

The Company may collaborate with one or more other companies for undertaking CSR projects, programmes, or activities, provided that the CSR committees of the respective companies are in a position to report separately on such projects in accordance with the Act and the Rules.

6. Governance and Monitoring Process

The Company has a well-defined governance structure to oversee the implementation of this Policy and the monitoring of CSR projects, in accordance with Section 135 of the Companies Act, 2013.



CSR Committee

The CSR Committee of the Board of Directors of the Company shall be responsible for formulating and recommending to the Board this CSR Policy and the CSR Annual Action Plan, and for monitoring the implementation of CSR projects. The Board may alter the CSR Annual Action Plan at any time during the financial year, based on the reasonable justification and recommendation of the CSR Committee. The CSR Committee shall report to the Board of Directors of the Company.

The CSR Committee of the Company comprises Mr. Ajay Bhutani (Managing Director) and Ms. Neeta Soorma (Director), together with such other director(s) .

CSR Annual Action Plan

The CSR Annual Action Plan shall include the following:

- the list of CSR projects or programmes approved to be undertaken in areas specified in Schedule VII of the Act;
- the manner of execution of such projects or programmes;
- the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- the monitoring and reporting mechanism for the projects or programmes; and
- details of need and impact assessment, if any, for the projects undertaken by the Company.

Impact Assessment

Where required under the Act and the Rules, the Company shall carry out impact assessment of its CSR projects through an independent agency, at the frequency and value thresholds prescribed by law from time to time.

Where the Company collaborates with one or more other companies for a CSR project, the impact assessment carried out by any one company for such common project may be shared with the other collaborating companies for the purpose of disclosure to their respective Boards and in their respective annual reports on CSR, and the cost of such impact assessment may be shared subject to the limits prescribed under the Rules.

This CSR Policy shall be uploaded on the Company's website, if applicable, for the information of all stakeholders.

For Polar Auto and Engineering Industries Private Limited

Ajay Bhutani
Managing Director



Annexure 1 – CSR Projects of the Company

The table below is to be completed and updated by the CSR Committee at the start of each financial year, as part of the CSR Annual Action Plan.

Annexure 1 – CSR projects of Polar Auto and Engineering Industries Private Limited (2026-2027)

Sr. No.	School / Institution / Beneficiary Location	CSR Project / Programme	Schedule VII Category	Implementation Modality	Location	Implementation Schedule			
						Q1	Q2	Q3	Q4
1	GGSSS Tilpat (1009)	Health care and sanitation, and making available safe drinking water	1	Direct	Faridabad	✓	✓		
2	Gurukul, Faridabad	Health care and sanitation, and making available safe drinking water	1	Direct	Faridabad		✓		
3	GMSSS Sarai Khawja	Health care and sanitation, and making available safe drinking water	1	Direct	Faridabad			✓	✓
4	GGSSS Dayalpur	Health care and sanitation, and making available safe drinking water	1	Direct	Faridabad			✓	✓
5	Sanatan Dharm kanya inter School.	Health care and sanitation, and making available safe drinking water	1	Direct	Rudrapur			✓	✓
6	GGIC Rudrapur	Health care and sanitation, and making available safe drinking water	1	Direct	Rudrapur			✓	✓
7	Guru Nanak Gilrs inter College	Health care and sanitation, and making available safe drinking water	1	Direct	Rudrapur			✓	✓



8	Govt. Inter College, Kanakpur, Distt. U.S. Nagar, Rudrapur,	Health care and sanitation, and making available safe drinking water	1	Direct	Rudrapur		✓	✓	✓
9	Community / Identified Beneficiary Groups	Hunger Relief and Nutritional Support Programme for Identified Economically Vulnerable Beneficiaries.	1	Direct	Faridabad / Zaheerabad / Rudrapur		✓	✓	✓
10	Gurukul, Faridabad	Education & Skill Development	2	Direct	Faridabad			✓	
11	GGSSS Dayalpur	Education & Skill Development	2	Direct	Ballabgarh	✓	✓	✓	✓
12	Government Primary School, Mawai	Education & Skill Development	2	Direct	Faridabad			✓	✓
13	GMSSS Sarai Khawja	Education & Skill Development	2	Direct	Faridabad			✓	✓
14	Govermant Primary School Dayal Nagar	Education & Skill Development	2	Direct	Faridabad			✓	✓
15	Government School, MPPS Buchinelly, Zaheerabad	Education & Skill Development	2	Direct	Zaheerabad		✓		
16	Govt. Inter College, Kanakpur, Distt. U.S. Nagar, Rudrapur.	Education & Skill Development	2	Direct	Rudrapur		✓		
17	Government Senior Secondary School Rudrapur	Education & Skill Development	2	Direct	Rudrapur		✓		
18	Gurukul, Palwal & Faridabad; Vanprast Vradhjan Seba Sadan, Faridabad (Old Age Home)	Blanket Distribution & Elderly Welfare Support Programme	3	Direct	Faridabad			✓	



19	Government Primary School, Mawai	Environmental Sustainability	4	Direct	Faridabad		✓		
20	Gau Raksha Sewa Samiti, Rudrapur	Provide safe, hygienic and sustainable shelter and basic care facilities for stray/abandoned animals	4	Direct	Rudrapur		✓	✓	✓
21	Tree Plantation	Environmental Sustainability	4	Direct	Faridabad / Zaheerabad / Rudrapur			✓	✓

Note:

1. The CSR programmes proposed for **Q3 and Q4 of FY 2026–2027** are presently **under process / upcoming**, internal approvals, implementation planning and availability of required resources.
2. The implementation schedule may be modified, if required, based on project requirements, ground-level conditions and management/CSR Committee approval.
3. The activities will be implemented in accordance with the applicable provisions of **Section 135 of the Companies Act, 2013 and Schedule VII**, as applicable.



Annexure 2 – Version History of the CSR Policy

Version	Prepared By	Changes & Reasons for Change
1.0	Ms. Anjali Bhutani	First issue of the CSR Policy, adopted pursuant to Section 135 of the Companies Act, 2013.