HELLERMANNTYTON PRIVATE LIMITED

Corporate Social Responsibility

(CSR) Policy

(Last Updated as on 13th August 2025)

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1. NEED FOR CSR

Corporate Social Responsibility (CSR) is a Company's sense of responsibility towards the ecological, physical and social environment in which it operates. CSR is a self-regulation business model through which corporate entities achieve balance on economic, environmental, and social imperatives with their operations and development. It is a step towards organizations to become socially responsible corporate citizens and creates a positive impact on the environment, communities and societies.

2. PURPOSE

In conformity with requirements laid down under Section 135 of the Companies Act, 2013 ("Act") and the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("CSR Rules") and circulars issued by the Ministry of Corporate Affairs ("MCA"), a "CSR Policy" of the Company was adopted by the Board of Directors. Subsequently, to conform to the notifications issued by MCA over a period of time, the Board adopted revised CSR Policies, as recommended by its CSR Committee. The Policy can be downloaded from the website of Company at https://www.hellermanntyton.com/in/news

3. CSR COMMITTEE

The Company has constituted Corporate Social Responsibility Committee ("the Committee") comprising of following Directors:

- Mr. Nishant Sharma, Chairman;
- Mr. Alasdair Charles James Abercrombie-Barnett, Member;~~.~~
- Mr. Andrew Thomas James Leyland, Member; and
- Mr. Sakthivel Rajadeva Naveenraj, Member.

Board of Directors of the Company may re-constitute the Committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The Committee shall exercise powers and perform the functions assigned to it by the Board of Directors of the Company pursuant to section 135 of the Companies Act, 2013 and CSR Rules notified with regard thereto.

4. CSR ACTIVITIES

Pursuant to Schedule VII of the Companies Act, 2013, the Committee has approved the following activities as "CSR Activities" to be undertake under the CSR policy of the Company. The Board of Directors has reviewed the said activities and express its consent to the Committee to pursue the said activities under CSR policy of the Company under section 135 of the Companies Act, 2014, Schedule VII and other applicable rules, regulations, notifications etc., issued/to be issued from time to time.

APPROVED CSR ACTIVITIES:

- Promoting preventive healthcare and sanitation to the public;
- Promoting education, including primary, secondary and higher secondary education, as well as special education and employment enhancing vocation skills, especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- Projects, Activities, and Programmes relating to the conservation of natural resources including renewable energy sources;
- Projects, Activities, and Programmes relating to water conservation and maintaining the quality of soil, air, and water;
- Promoting Gender equality and empowerment of women
- Community Health- Innovation projects to meet local needs. Reaching out with basic health care to all (bridging the gap).
- Sustainable livelihood Projects – Holding hands of all marginalized group to improve livelihood opportunity, thus improving their quality of life.
- Rural Infrastructure Development- Need based quality infrastructure to improve quality of life.

5. BUDGET FOR CSR ACTIVITY:

The Company shall allocate the budget for CSR activities. The minimum budgeted amount for a financial year shall be 2 percent of the average net profit of three immediate preceding financial years. The Company may allocate more fund/amount than the amount prescribed under section 135 of the Companies Act, 2013, for the CSR activities for any financial year. The Committee shall calculate the total fund for the CSR activities and recommend to the Board for the approval. The Board shall approve the total fund to be utilized for CSR activity for respective financial year.

CSR expenditure shall include all expenditure including contribution to corpus for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the approved CSR activities.

6. IDENTIFICATION OF ACTIVITIES/PROJECTS OF CSR ACTIVITIES:

Out of approved CSR activities, the Committee shall decide which activity/project should be given priority for the respective financial year. While arriving at the decision of the activity to be undertaken for the respective year, the Committee shall analyze the basic need of the community/ area in which the Organisation operates or at the place where its registered office is situated. The Committee shall record its findings and prioritized CSR activities.

7. IMPLEMENTATION OF CSR ACTIVITIES:

After prioritizing the activity, the Committee shall finalize the detailed implementation project/program, including planning for expenses against the total budget allocated for CSR activities.

8. MONITORING AND REPORTING ON CSR ACTIVITIES

The Board of Directors shall constantly monitor the implementation of the CSR activities. The CSR committee shall place a progress report, including details of expenses, before the Board on quarterly basis. The Board shall review the same and suggest recommendation, if any, to the committee with regard to implementation process.

9. CSR EXPENDITURE

The annual CSR budget would be approved by the Board on the recommendations of the CSR Committee, subject to the provisions of the Act and Rules made thereunder as amended from time to time.

Based on the total approved budget, funds would be allocated for different projects based on the identified CSR plan on yearly basis. The average net profit for the purpose of determining the spending on CSR activities is to be computed in accordance with the provisions of section 198 of the Act and will also be exclusive of the items given under rule 2(1)(h) of the Companies (CSR Policy) Rules, 2014.

Section 198 of the Act specifies certain additions / deletions (adjustments) to be made while calculating the net profit of a Company.

In pursuant to the provisions of Section 135(5) of the Act, the CSR Committee of the Company shall ensure that the Company spends in every financial year, at least two per cent of the average net profits of the Company made during the three immediately preceding financial years on the CSR activities of the Company specified under Schedule VII of the Act.

10. COMPLIANCE AND REPORTING TO BOARD:

The Committee is responsible for undertaking CSR activities as per the approved CSR Policy. Apart from quarterly reporting to the

Board about the implementation of CSR activity, a detail report containing the implementation schedule, total budget allocated, actual expenses incur, surplus arising, if any, result achieved, further work to do in the concern CSR activity, Recommendation for the CSR activities for next year etc. should be placed before the Board for its consideration. Any surplus arising out of the fund allocated for CSR activity shall not be part of the business profit of the company.

11. 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.

Our Corporate Social Responsibility policy conforms to the relevant section of the Corporate Social Responsibility, Rules made under Companies Act, 2013 and amendment(s) to be made thereto in future.