

JAIN FARM FRESH FOODS LIMITED

Corporate Social Responsibility Policy

1. Objective and Vision:-

At Jain Farm Fresh Foods Ltd, corporate social responsibility is not merely a matter of an obligation to be fulfilled or an account to be presented to society. We firmly believe that we are indebted to society for our existence, survival and success. We have experienced that we have an invisible bond with society. This bond inevitably leads us to a natural relationship of empathy. It impels the corporation to understand and appreciate social issues and problems. It results in our being part and parcel of the society's progression through the process of inclusive growth. We continually search for innovative ways and means of creating a bridge between the corporation's objectives and social priorities. This process has enlightened us with the grassroots realities. The more we realize this, the more determined we become to evolve a creative partnership between the corporate growth process and its impact on the society.

Company always believed that rural development is key to nation building.

We have put in place a culture which looks at a business proposition from these angles:

- (a) Whether the corporation will produce an article or service which would satisfy a desirable social need,
- (b) Whether the project would impact the environment in a positive way,
- (c) Whether the business would help foster conservation of natural resources and through that promote food security, and
- (d) Whether it would provide for an inclusive growth.

We are, therefore, committed to a sustainable model – through partnership and value addition, which leads to increase in value not only of shareholders, but also of other stakeholders including the consumers, suppliers, business partners and the community at large. Each of our businesses is socially impacted and in turn favorably impacts the society and the environment. Together, this relationship results in the harmonious co-existence of a symbiotically sustainable business, society and environment. This philosophy is born out of our Mission Statement, formulated twenty-five years ago by Parent Company i.e. Jain Irrigation Systems Limited – **“Leave this world better than you found it.”**

This Policy has been formulated and recommended by the CSR Committee to the Board of Directors of the Company and was duly adopted by the Board on [•] March 2022. This Policy lays down the primary vision of the Company with regard to its CSR activities. The Company may change this Policy from time to time in accordance with law and in accordance with the needs of the Company.

2. Scope and definition:-

This policy shall be applicable to all CSR projects/program/activities undertaken by the Jain Farm Fresh Foods Ltd., Jalgaon (Company) in India as per Schedule VII of the Act.

Notwithstanding anything contained in this Policy: (a) the provisions of this Policy and all the actions specified in this Policy, shall at all times be subject to the provisions of the Constitution Documents; and the rights of the Investor under the Constitution Documents; (b) Nothing contained in this policy shall be deemed to be a consent/approval/no-objection/affirmative vote/grant/permission etc of the Investor for any matter and/or item, for which the Investor's consent/approval/no-objection/affirmative vote/grant/permission etc, is required as per any of the Constitution Documents; (c) in the event of any conflict and/or contradiction between the provisions of this Policy and the provisions of the Constitution documents, the provisions of the Constitution Documents shall prevail; (d) if any action is taken by any person as per or pursuant to this Policy, which is in violation, breach, non-compliance and/or conflicting with the provisions of the Constitution Documents, then such action shall be void ab initio; (e) the provisions and/or terms and conditions of this Policy, does not amend, modify and/or supersede the provisions of the Constitution Documents; and (f) the provisions of this Policy does not constitute a waiver and/or release of any claims of any person, for any prior or subsequent breach and/or non-compliance of any of the Constitution Documents.

In this CSR, terms/abbreviations used herein shall bear the following meaning:-

"Act" shall mean the Companies Act, 2013, as amended from time to time.

"Articles", or "Articles of Association" means the articles of association of the Company, as amended from time to time.

"Board" shall mean the Board of Directors of Jain Farm Fresh Foods Limited.

"Committee" or "CSR Committee" shall mean a Committee of the Board set up to carry out such functions as prescribed under the Act/Rules in connection with CSR.

"Company" shall mean Jain Farm Fresh Foods Limited.

"Constitution Documents" means the Articles, the Memorandum of Association and the shareholders agreement executed between Mandala Primrose Co-Investment Limited, the Company and the promoters of the Company.

"CSR" shall mean Corporate Social Responsibility as understood under the Companies Act, 2013, and Rules made thereunder as amended from time to time.

"Investor" means Mandala Primrose Co-Investment Limited, having its address at Sanne House, Bank Street, Twenty-Eight, Cyber City, Ebene 72201, Mauritius.

"Rules" shall mean the Companies (Corporate Social Responsibility) Rules, 2014, as amended from time to time.

Other definitions and abbreviations as applicable as per Section 135 and other provisions of the Act, Schedule VII to the Act and the Rules.

3. CSR committee:-

CSR committee has been formed amongst the Board of Directors. The CSR committee will carry out such functions as prescribed under Section 135 of the Act and the Rules. Generally, the CSR committee shall be responsible for preparing the draft of the CSR policy and recommending the same to the Board. It shall also study prospective CSR activities/projects and give suggestions to the Board. Further, it shall also be responsible for implementation/monitoring and review of the CSR policy and various projects/activities undertaken as per the policy. The CSR committee shall submit quarterly reports to the Board of Directors.

4. CSR projects, programs and activities:

Company will carry out CSR activities on its own as per procedure established by the law. Further, it shall also carry its activities through Bhavarlal and Kantabai Jain Foundation ("**BKJF**", an independent trust bearing CSR Registration Number:CSR00004573) and Gandhi Research Foundation ("**GRF**", CSR Registration Number: *CSR00004570*) a company duly registered under Section 8 of the Companies Act, 2013. BKJMF and GRF will be mainstay of the CSR projects, programs and activities undertaken by the Company along with its own direct projects declared and formulated time to time as per the need. These are a not-for-profit company, and a registered public trust established by due process of the law and carry out activities and projects that are in consonance with both the letter and spirit of the requirements of the law. These bodies have experience of several years in these areas and have more than three years' track record. They also carry out activities in the local area or areas where the Company operates. The Company shall carry out its CSR activities primarily through these bodies in manner prescribed by law either directly or through projects of such bodies or in such other manner as is permissible. The Company may, however, also carry out other CSR activities as permissible by law and as approved by the CSR Committee from time to time.

4.1 : Rural development projects:

BKJMF and GRF undertake projects related to rural development in India generally, but more specifically in local area where Company operates its major plants. In particular, they undertake projects in villages which respond well to projects for sustainable development activities related to health and sanitation, education, women empowerment, livelihood improvement, basic infrastructure, skill and efficiency improvement etc., these activities are tailor made as per the needs of the villages and farmers. The needs can be livelihood, drinking water, infrastructure, education, skill efficiency improvement, health and sanitation etc., though not limited only to these. The activities which create shared value can also be undertaken along the implementing partners as prescribed by law or regulations.

4.2: Sports

Jain Farm Fresh Foods Limited has strong roots in Jalgaon. Development of sports and sportsmen in this region is of prime importance and thrust of the CSR policy of the Company. We will continue to develop the sportsmen in various sports, with

proper training facilities with proper coaching facility, proper ground and development of overall infrastructure of international level. These activities will be undertaken by Jain Sports Academy, which is the arm of BKJMF.

4.3: Education

Education is fundamental for societal development. The education with better livelihood skills will be mainstay of the Company's priority in CSR. The Anubhuti International School, Anubhuti English Medium School, Gaurai Tantra Niketan and Sundarlal Malhara Potential Development Academy (All part of Bhavarlal & Kantabai Jain Multi-Purpose Foundation) are presently mainstay of the education and Skills development. They have experience in education, skill development and efficiency improvement activities of several years. Since each of these institutions is consistent with the primary thrust of the Company in this area, the Company will encourage and get involved in projects undertaken by them.

4.4: Cultural Development

Culture, literature and art are the basis on which society expresses itself. The intellectual development of individual and also healthy societies has flourished with development of art and literature. The region of Khandesh is one of the important geographical regions in terms of literature and art. Hence, to inculcate the values of Indian culture among the young generation, it is very important to support these activities. The activities will be done through Bahinabai Memorial Trust which is under the aegis of BKJMF and also the GRF.

4.5:- Others

All other activities which are not mentioned above but are covered by the Section 135 read with Schedule VII of the Companies Act, 2013 will be considered under this category. **e.g.** Medical or educational help to any destitute or poor in the society who approaches the CSR wing or any concerned official of the Company. The activities under this category shall be preferably carried out in the local areas where the Company operates.

Tabular view of the activities:-

Activity		New Target or Sector On-going	Target Group	Geographical Area		Responsible Party	Allocated Expenditure
Currently undertaken	Proposed to be undertaken			Within Local Area	Other State or district where undertaken		
1. Education, knowledge		Village or rural	Farmers	Bhavarlal & Kantabai	Directly by JFFFL	Bhavarlal & Kantabai	

e developm ent of farmers		areas		Jain Foundati on		Jain Foundatio n and JFFFL	<i>To be Discusse d and finalised</i>
2. Improve efficiency and self- depende nce of farmers		Villa ge or rural area s	Farme rs	Bhavarlal & Kantabai Jain Foundati on	Directly by JFFFL	Bhavarlal & Kantabai Jain Foundatio n and JFFFL	
3. Skill developm ent		Villag e or rural areas	Farme rs	Bhavarlal & Kantabai Jain Foundati on	Directly by JFFFL	Bhavarlal & Kantabai Jain Foundatio n and JFFFL	
4. Communit y developm ent		Villag e or rural areas	Farme rs	Bhavarlal & Kantabai Jain Foundati on	Directly by JFFFL	Bhavarlal & Kantabai Jain Foundatio n and JFFFL	
5. Sports developm ent		Rura l	Studen ts	Bhavarlal & Kantabai Jain Foundati on	Directly by JFFFL	Bhavarlal & Kantabai Jain Foundatio n and JFFFL	
6. Medical		Rural	Gener al	Bhavarlal & Kantabai Jain Foundati on	Directly by JFFFL	Bhavarlal & Kantabai Jain Foundatio n and JFFFL	

5. CSR expenditure:-

The CSR activities undertaken in India only shall amount to CSR expenditure. The CSR expenditure shall include all expenditure as permissible under Section 135 of the Act/Rules made thereunder, including contribution to the corpus for CSR activities undertaken by BKJMPF and GRF, contribution to ongoing projects as well as directly undertaken projects/expenditure within the framework of this Policy. This may include expenditure for building CSR capacities of own personnel and/or of institutions/bodies through which it undertakes CSR activities/projects upto limits laid down in law. The expenditure should be approved by the Board on the recommendation of the CSR committee. The amount of expenditure towards CSR

projects and activities shall be at least 2% of the average net profits of the Company, as calculated in the manner provided under Section 135 of the Act read with Rules made thereunder, during the past three financial years (or such higher or lower amount as the Articles may provide from time to time). The CSR Committee may decide the allocation of such expenditure within the framework of this policy. The surplus, if any, arising out of CSR activities/projects so undertaken shall not form part of the business profit of the Company and instead shall be spent for CSR activities/projects and accordingly netted off against CSR expenditure to be incurred in subsequent financial years. The Company shall ensure that administrative overheads related to CSR activities shall not exceed five percent of total CSR expenditure of the Company for the financial year.

6. Implementation:-

The Company shall generally carry out its CSR activities either through its own flagship program or through contributions to BKJMPF and GRF, which are eligible under the provisions of Section 135 of the Act and the Rules. Other than these, any institute, NGO, government, semi government, autonomous body, trusts etc., having an established track record of 3 years will be considered for running any CSR activities of the Company, as may be decided by the Committee from time to time. Further, the Company may also undertake CSR activities directly of a nature similar to those described in this Policy.

6.1 DETAILS OF SPENDING (Directly by JFFFL)

Activity	Amount Allocated	Spent		Unspent	Cumulative expenditure up to the reporting period	Excess revenue from the activity	Balance in corpus
		Direct	Overhead				
1. Education, knowledge development of farmers							
2. Improve efficiency and self-dependence of farmers							
3. Skill development							
4. Community development							
5. Sports development							
6. Medical							

6.2 DETAILS OF SPENDING (Through Gandhi Research Foundation /Bhavarlal & Kantabai Jain Foundation)

Activity	Amount	Spent	Unspent	Cumulative	Excess	Bala
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	Allocated	Direct	Overhead		expenditure up to the reporting period	revenue from the activity	nce in corpus
1. Education, knowledge development of farmers							
2. Improve efficiency and self-dependence of farmers							
3. Skill development							
4. Community development							
5. Sports development							
6. Medical							

6.3 CAPACITY BUILDING

This will be a part of the future CSR roadmap (next 3 years vision).

Particulars	Years		
	For FY -	For FY --	For FY --
Net Profit (1) (Rs. in million)			
Less:			
Profit from overseas branch or branches (2)	-	-	-
Dividend from other companies in India complying with provisions of section 135 (3)	NA	NA	NA
Adjusted Net profit (1-2-3)	A=	B= --	C= ---
Average Adjusted Net Profit: (A+B+C)/3	Rs. ---- (in million)		
2% of Average Adjusted Net Profit (Minimum CSR Expenditure as per Section 135 of the Companies Act, 2013)	Rs. ---- (in million)		

7. Monitoring and Reporting

The CSR committee will be responsible for transparently monitoring of program, projects and activities of all CSR activities. The CSR committee shall have powers to seek periodic reports on monitoring and implementation regarding the projects of the Company being carried out through BKJMPPF, GRF and other implementing partners. CSR committee shall designate the persons or a team of officials to coordinate the activities regarding, funds, implementation and reporting the CSR committee shall submit the annual report of CSR activities to be a part of annual financial statement of the Company. The Board/CSR Committee shall designate one

or more persons to carry out implementation of the activities/projects including the monitoring, supervision, reporting at specified intervals, etc. in accordance with the CSR Policy and approvals of the Committee in this regard from time to time. The ultimate responsibility to confirm that the funds so disbursed under the CSR initiatives have been utilised for the purposes and in the manner as approved, shall lie with the Board and the Company's CFO.

The disclosures of CSR policy, CSR committee, CSR Initiatives and CSR spend in the year should be part of annual financial statement.

This Corporate Social Responsibility Policy shall supersede all previous corporate social responsibility policies (whether oral or written), if any, and the Corporate Social Responsibility Policy shall come into effect on such date as approved by the Board on 7th June, 2024

