

**L&L PRODUCTS INDIA PRIVATE LIMITED**  
**SOCIAL COMMITMENT POLICY****PREAMBLE**

L&L Products India Private Limited is incorporated in Chakan, Pune, Maharashtra. The company is an applied engineering and material science company specializing in structural reinforcements, NVH sealants, and thermal and acoustic insulations. L&L products primarily caters to automotive, commercial vehicles, and aerospace industry.

Corporate Social Responsibility (CSR) is the way and means through which corporates can repay the obligations made by Society by contributing the resources in their various forms as required for the efficient operation of the Business. Corporate Social Responsibility is strongly connected with the principles of sustainability. Organizations should make decisions based not only on financial or operational factors but also on the social and environmental consequences. Therefore, it is the core corporate responsibility to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

We believe to drive our Social Commitment Policy with the same values “To be a good place for all who touch it, where the quality of work, product, and relationships are a priority.” This Social Commitment Policy absorbs core values and is aligned in the following manner to its CSR Strategy. L&L Products recognizes that ensuring lasting impact will require our CSR programs to leverage our existing strengths, work with communities we have access to, focus our interventions, and where possible facilitate new ways of delivering services to address the most pressing social challenges.

**APPLICABILITY**

This Social Commitment Policy is applicable to L&L Products India Pvt. Ltd. which is mandated with the CSR expenditure obligations as per section 135 of The Companies Act, 2013 (“The Act”) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.



## L&L Products India - Social Commitment Policy

### SCOPE OF SOCIAL COMMITMENT POLICY

This Policy is applied to all CSR Projects that will be undertaken by L&L Products India Pvt. Ltd. and shall fulfill the requirements of Section 135 of the Companies Act, 2013 and the rules made thereunder. L&L Products India Pvt. Ltd. shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act, 2013. This Policy will be periodically reviewed and updated in line with the relevant codes of legislation and best practices that can be adopted by L&L Products India Pvt. Ltd.

### AREAS TO EMPHASIZE

L&L Products India Pvt. Ltd. has broadly selected three areas of focus under its CSR activities, as under:

#### 1. Education

Promoting education, including special education in unprivileged rural areas in the various districts of Maharashtra State.

#### 2. Environment

Ensuring environment sustainability and ecological balance, protection of flora and fauna, conservation of natural resources, and maintaining the quality of soil, air, and water.

#### 3. Medical and other welfare

Eradicating hunger, poverty, and malnutrition, promoting health care, preventive health care, and sanitation.

### CSR BUDGET

1. The Board of Directors of the Company shall ensure that in each financial year the Company spends at least 2% of the average net profit made during the three immediately preceding financial years.
2. In case of any surplus arising out of CSR projects, the same shall not form part of the business profits of the Company.

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**L&L Products India Private Limited**  
**Regd. Office & Works :**

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Tel. (+91) 2135-611100, Mail ID. Info.india@llproducts.com CIN: U25190PN2010PTC194681



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3. The Company may collaborate or pool resources with other companies to undertake CSR activities.
4. As per section-135 of the Companies Act, 2013 (“the Act”), the Company will report in its annual report to the shareholders of the company, reasons, if any, for underspending the allocated CSR budget in any of the financial years.

### UNDERTAKING CSR ACTIVITIES

L&L Products India Pvt. Ltd. will undertake CSR projects either on its own or through a registered public trust or society registered under section 12A and 80G of the Income Tax Act, 1961 that are engaged in activities or programs which fall within the purview of L&L Products Social Commitment Policy and areas of focus, or directly through a company, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961.

### GOVERNANCE STRUCTURE

A governance structure at L&L Products India Pvt. Ltd. is responsible for implementing and administering Social Commitment Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013 and rules made thereunder.

L&L Products India Pvt. Ltd. has constituted a CSR Committee at the Board level. The CSR Committee is supported by the CSR Team, comprised of representatives from both these entities

### VALIDITY AND MAINTENANCE OF CSR POLICY

1. This Social Commitment Policy of the Company has been approved by the Board of Directors, at its meeting held on **24<sup>th</sup> June 2021** and shall remain in force until modified by the Board.
2. This Social Commitment Policy will be maintained by the CSR Committee of the Board of Directors and reviewed by the Board of Directors at periodic intervals.

### CSR COMMITTEE

L&L Products India Pvt. Ltd. has constituted Corporate Social Responsibility Committee (The “CSR Committee). The CSR Committee consists of the following members of the Board.

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1. Mr. Nitin Mehta
2. Mr. Christophe Maurice Carre

The CSR Committee of the Board Shall be responsible for:

1. Review of CSR Activities in the Company
2. Formulation of CSR Policy.
3. Monitoring of implementation of CSR Policy.
4. Recommended to the Board, modifications to CSR Policy as and when required.
5. Appraise to the Board for the CSR Expenditure done during the year.

### CSR TEAM

A dedicated CSR Team shall be constituted from among the employees of L&L Products India Pvt. Ltd., mainly Legal and HR for implementing CSR Policy and shall work under the guidance of the CSR Committee and will be mainly responsible for:

1. Execution of the Social Commitment Policy.
2. Identify projects and key initiatives pursuant to Social Commitment Policy.
3. Facilitating allocation of funds to the projects as identified for CSR activities.
4. Monitoring CSR Projects to establish the effectiveness of CSR efforts and appraise the same to CSR Committee.
5. Compilation of information & preparation of Annual Reports on CSR activities and presenting the same to CSR Committee.
6. Any other activity necessary to ensure the achievement of CSR objectives.

### MONITORING AND EVALUATION OF PROJECTS

A robust monitoring and evaluation system will be put in place. The monitoring and reporting mechanism is divided into three distinct areas:

1. Program Monitoring
2. Evaluation
3. Reporting and Documentation
4. The monitoring and evaluation system will aim to ensure that every program has:
5. Clearly defined outcomes, outputs, and indicators that are linked with, where possible, measurable targets and timelines.
6. A robust progress monitoring system for day-to-day implementation.
7. Undertake impact assessments as per the evaluation plan developed by the Company.
8. Yearly reporting of CSR expenditure as per the requirements of the Act.

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### REPORTING

The CSR Committee of the Board, based on reports presented by the CSR Team, will annually publish the report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by Section 135 of the Companies Act 2013 and the rules made thereunder. The CSR Committee shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR Policy are in compliance with the approved CSR Policy of the Company.

The CSR Policy on being approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

### ANNUAL ACTION PLAN

The CSR Committee shall formulate and recommend to the Board an Annual Action Plan in pursuance of the Social Commitment Policy, which shall include the following:

1. The list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act
2. The manner of execution of such projects or programs.
3. The modalities of utilization of funds and implementation schedules for the projects or programs
4. Monitoring and reporting mechanism for the projects or programs.
5. Details of need and impact assessment, if any, for the projects undertaken by the company

The Board may alter such plan at any time during the financial year, per the recommendation of the CSR Committee, based on the reasonable justification to that effect."

### DISPLAY OF THE SOCIAL COMMITMENT POLICY ON THE WEBSITE OF THE COMPANY

This Corporate Social Responsibility Committee approved by the Board of the Company in their meeting held on 24.06.2021 shall be placed on the website of the company.

This Corporate Social Responsibility Committee is subject to such changes and amendments as may be notified by the Ministry of Corporate Affairs under Section 135 of the Companies Act, 2013, and rules made thereunder and the same shall be read in line with the provisions

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of the Act applicable to the Company from time to time.



### QUESTIONS

Questions about this Policy can be addressed to your Legal Department.

A handwritten signature in blue ink, appearing to read 'Sajesh Madhavan'.

**Sajesh Madhavan**  
Director  
(DIN : 08452372)

