



**ANAND NVH PRODUCTS PVT LIMITED**

DOC NO: CSR-M-01  
EDITION: 02

**CORPORATE SOCIAL RESPONSIBILITY POLICY MANUAL**

REV DATE: 02/09/2026

**ANAND NVH PRODUCTS PVT. LTD.**

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POLICY MANUAL**

**Document No: CSR-M-01**

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**WORKS: 39 KM Stone NH 8 Begumpur Khatola Industrial Area Sector -35 Gurgaon 122001**

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#### A. PREAMBLE

Anand NVH Products Private Limited ('The Company') incorporated on **June 7, 1988** started production from **2000**. Anand NVH Products Pvt Ltd (ANP) as a leading manufacturer offering value added engineering solutions in the area of Noise Reduction, Vibration Isolation, Harshness Control in Automotive applications. We have specialized in manufacturing of Anti-Vibration Rubber & Rubber to Metal/ Plastic Bonded components for Power-train, Chassis & Suspension applications.

Blending new-age technologies with innovation and excellence, the company has acquired a leading edge in manufacturing a wide range of Anti-Vibration Rubber Molded and Rubber to metal/ plastic bonded parts.

Anand NVH Products Pvt. Ltd. continues to grow and enjoys good customer relationships with leading OEMs such as General Motors, Ford, Volkswagen, Skoda, Maruti Suzuki, Ashok Leyland, Volvo etc. Apart from these, we enjoy preferred supplier relationships with 1st Tier's including Benteler, Cosma, Conti Tech, Tenneco, TRW, JBML etc. and servicing these customers in more than 17 countries across North & South America, Europe, Russia, China, South Korea, South Asia, Australia & South Africa.

Anand NVH Products Pvt. Ltd. is proud to have a modern composite plant having all manufacturing facilities in-house including product design, development & validation, tool making and program management. The company is certified by TUV for ISO/TS 16949:2009 and ISO 14001:2004. It is also one of the few companies which are certified on QSB by General Motors and is recognized by GM for Best Practices across its operations.

Our product portfolio for automotive industry includes Engine Mounts, Body Mounts, Transmission Mountings, Strut Mounts, Sub Frame Bushes, Suspension Arm Bushes, Control Arm Bushes, Tri Functional Bushes, Stabilizer Bar Bushes, Trailing & Link Arm Bushes, Pendulum Support & Silicone Exhaust Hangers.

Over the period of its long existence, the company has upheld its tradition of community service and tried to reach out to the underprivileged in order to empower their lives and provide holistic development. CSR activities and efforts are constantly being made by the company in the core focus areas of providing quality educational support to students from the disadvantaged section of the society, improved access to healthcare services and awareness building regarding efficient use of energy resources. Thus, the company strives to be in service of to the community at large and provide services that create holistic development and operate in alignment with the company's philosophy.

The company's CSR Policy focuses on leveraging the full range of the Company's resources to broaden access to basic facilities for the underserved population.

#### B. DEFINITIONS

**ANAND NVH PRODUCTS PVT LIMITED**DOC NO: CSR-M-01  
EDITION: 02**CORPORATE SOCIAL RESPONSIBILITY POLICY MANUAL**

REV DATE: 02/09/2026

1. **“Act”** shall mean the Companies Act, 2013 including any modifications, amendments or re-enactment thereof.
2. **“Board”** shall mean the Board of Directors of the Company.
3. **“CSR Committee”** means the Corporate Social Responsibility Committee as constituted by the Board from time to time.
4. **“CSR Officer”** shall mean a person engaged by the Company to assist the CSR Committee to implement the CSR activities envisaged under the Policy.
5. **“CSR Policy”** shall mean the Corporate Social Responsibility Policy of the Company, which covers the yearly activities undertaken by the Company under the policy and the CSR Expenditure thereon.
6. **“Directors”** means Directors of the Company.
7. **“Financial Year”** shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.
8. **“Net Profits”** shall mean the net profits of the Company as defined under the Act and the Rules based on which a specific percentage for CSR expenditure has to be calculated.
9. **“Rules”** shall mean the Companies (Corporate Social Responsibility) Rules, 2014, including any modifications, amendments or re-enactment thereof.

**C. TITLE AND APPLICABILITY**

The company has been undertaking community-oriented programs for inclusive development of the deprived sections of the population. The company's focus areas are concentrated on increasing access to health, education and holistic development with a focus on underprivileged people living around its manufacturing unit. The company wishes to formalize and institutionalize its efforts made in the domain of corporate social responsibility in this Policy document.

This Policy shall serve as a guiding document to help identify, execute and monitor CSR projects in keeping with the spirit of the Policy. This Policy shall apply to all CSR initiatives and activities taken up by the company for the benefit of different sections of the society.

Further to the company's philosophy and guiding principles, in compliance with the spirit underlying the provisions of Section 135 and related clauses of the Act:

- The company recognizes the importance of good corporate governance and corporate social responsibility. It seeks to promote and strengthen the trust of shareholders, other stakeholders and the public; and believes that operating in accordance with good corporate governance and corporate social responsibility practices is inherent in its philosophy.

**ANAND NVH PRODUCTS PVT LIMITED**DOC NO: CSR-M-01  
EDITION: 02**CORPORATE SOCIAL RESPONSIBILITY POLICY MANUAL**

REV DATE: 02/09/2026

- The CSR Policy shall be governed and guided by the company's corporate vision to achieve inclusive growth, and its aspiration for serving multiple market segments, its customers, shareholders, employees and community at large.
- To this endeavor, the Company shall strive to demonstrate the highest standards of ethics and act in accordance with the applicable law for the best interests of its shareholders, stakeholders and the society.
- The company's CSR Policy has been framed and formulated in accordance with Section 135 of the Act and the rules made thereunder.
- The company's CSR Policy is aligned with Schedule VII of the Act.
- The Policy shall apply to all CSR programs/projects of the Company.

**D. SCOPE**

The company seeks to impact the lives of the disadvantaged by supporting and engaging in activities that aim to improve its contribution to the society. It is dedicated to the cause of providing access to basic services, empowering people, educating them and to improving their quality of life. While the Company undertakes programs based on the identified needs of the community, healthcare, education and promoting community development initiatives remains at the forefront. Across the different programme areas focused by the company, it would be the Company's tireless endeavor to reach the disadvantaged and the marginalized sections of the society.

The following is the list of CSR projects or programs which the company plans to undertake pursuant to Schedule VII of the Companies Act, 2013:

- 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.
- promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- 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.
- 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 set-up by the Central Government for rejuvenation of river Ganga].

**ANAND NVH PRODUCTS PVT LIMITED**

DOC NO: CSR-M-01

EDITION: 02

**CORPORATE SOCIAL RESPONSIBILITY POLICY MANUAL**

REV DATE: 02/09/2026

- 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 art and handicrafts;
- measures for the benefit of armed forces veterans, war widows and their dependents, [ Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows];
- training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports
- contribution to the prime minister's national relief fund [or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- 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
- 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 Organization (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).]
- rural development projects
- slum area development.

Explanation- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

- disaster management, including relief, rehabilitation and reconstruction activities.

**E. CSR VISION**

- To be a socially responsible organization empowering lives by providing access to education, healthcare, art facilities, skill development, livelihood opportunities etc. to improve the overall quality of life.
- To actively contribute to the social and economic development of the communities in which the company operates. It commits to build a better, safer and sustainable way



## ANAND NVH PRODUCTS PVT LIMITED

### CORPORATE SOCIAL RESPONSIBILITY POLICY MANUAL

DOC NO: CSR-M-01

EDITION: 02

REV DATE: 02/09/2026

of life for the weaker sections of society and contribute to the overall human development.

- To promote inclusive growth fired by free-spirited entrepreneurship and community development.
- To be recognized for the Company's strong commitment towards the community and to uphold the values of community service.

#### F. CSR MISSION

The company's mission is to implement CSR programs and projects that assist in creating an empowered environment in the Indian society for inclusive growth leading to social and economic development of the community, in which we operate. Through a series of interventions, it seeks to reach out to various sections of society and provide them opportunities that empower their lives.

The company's strategy is to integrate the activities in community development, social responsibility and sustainable livelihoods and encourage these considerations into its operations. To achieve the same, the company will constantly strive to review and improve its efforts to positively contribute towards the wellbeing and welfare of the people across the country; especially area in the surrounding of its operation. It would ensure the same by continually reviewing and improving its efforts to conduct responsible business practices, uphold the highest ethical standards in all its engagements, and take the extra initiative to reduce damaging impacts on the environment and to nurture workplace of diversity and inclusion.

#### G. ROLES AND RESPONSIBILITIES: BOARD OF DIRECTORS

The Board of the company will be responsible for:

- Constituting the CSR Committee, If the CSR expenditure exceeds ₹50 lakhs
- approving the Company's CSR Policy, CSR action plan and budget.
- ensuring that the company spends, in every financial year, at least two percent of the company's average net profit made during the three preceding financial years.
- specifying the reasons in its report if, in an unlikely circumstance, the Company fails to spend the stipulated CSR money during a financial year,
- making any change(s) in the constitution of the CSR Committee from time to time.
- The Board of Directors of the company shall disclose contents of such policy in its report and the same shall be displayed on the company's website, if any, as per the particulars specified under the Act and Rules.
- The Board of Directors of the Company shall disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.

**ANAND NVH PRODUCTS PVT LIMITED**

DOC NO: CSR-M-01

EDITION: 02

**CORPORATE SOCIAL RESPONSIBILITY POLICY MANUAL**

REV DATE: 02/09/2026

**H. COSTITUTION OF CSR COMMITTEE**

Pursuant to the MCA Notification dated September 20, 2022, as the amount required to be spent towards CSR activities does not exceed ₹50 lakh consequently the board of the company has dissolved the CSR Committee of the Company in its meeting held on September 21, 2022. Accordingly, the Board of Directors of the Company shall be responsible for discharging the functions of the CSR Committee and ensuring compliance with the applicable provisions relating to Corporate Social Responsibility (CSR).

**I. ROLES & RESPONSIBILITIES OF THE BOARD**

- Prepare, revise and modify the CSR Policy for the Company and place the same with the Board of Directors for its approval.
- Formulate an annual action plan in pursuance of its CSR Policy, which shall include such information as required under the Act.
- Recommend the amount of expenditure to be incurred on the CSR activities.
- Ensure that the programme/ projects undertaken by the company on its own or through the implementing partners are aligned with the approved CSR policy of the company and are also aligned to Schedule VII and Section 135 of the Act.
- Will provide guidelines for selection of projects/ programme or implementing partners to the respective Human Resource or CSR teams, wherever applicable.
- Review and approve annual budgets with respect to CSR programme.
- In case the company is not able to spend the stipulated two percent of the average net profits of the preceding three financial years or any part thereof, the board shall provide the reasons for not spending the amount to the Board and such reasons shall also be included in the Board's report.
- Receiving reports from implementing partners to assess the performance and effectiveness of projects supported by the Company.
- Reviewing the findings and recommendations regarding the CSR initiatives from any investigation or audit conducted by regulatory agencies or external auditors or consultants.
- Respond to any query, observation or clarification sought by the Ministry of Corporate Affairs or any other regulatory authority with regard to the Company's CSR supported initiatives.
- Develop and institutionalize a CSR reporting mechanism in light with Section 135 and Rule 8 of the Act.
- Develop, recommend and oversee CSR Action Plan.
- And any other responsibility, as may be suggested by the Board.

**ANAND NVH PRODUCTS PVT LIMITED**

DOC NO: CSR-M-01

EDITION: 02

**CORPORATE SOCIAL RESPONSIBILITY POLICY MANUAL**

REV DATE: 02/09/2026

**J. CSR BUDGET**

Following is the mode of funding and allocation of area wise planned expenditure for the CSR activities.

- The Company shall, in every financial year, contribute a statutory minimum limit of at least 2% of its Net Profits for the CSR Expenditure.
- In the absence of Net Profits in any financial year, the Company endeavors to spend such feasible amount as it may decide.
- The board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.
- The CSR Committee shall prepare its annual planned expenditure, for a financial year, for the CSR activities including the thrust areas and manner of implementation etc., and submit the same for approval of the Board.
- The Company shall endeavor to spend the entire amount of statutory minimum contribution limit in a financial year. In the event, the Company is unable to spend such amount in any given financial year, the Board shall specify the reasons for the same in its report to the shareholders in terms of Section 134(3)(o) of the Act.
- In case of any surplus arising out of CSR projects, the same shall not form part of business profits of the Company.
- In case the Company spends an amount in excess of requirement provided under sub-section (5) of section 135, such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years as per the provisions of the act and the ruled made thereunder.

**K. EXPENDITURE NOT COVERED OR RECOGNIZED:**

In terms of the Rules, the following contributions shall not be considered as CSR Expenditure:

- a. Contributions of any amount, whether directly or indirectly, to any political party or any person associated with a political party.
- b. Amount spent, whether directly or indirectly, for the benefit of employees of the Company, its Subsidiaries and Associates and their families.
- c. Expenses incurred by the Company for the fulfillment of obligations any act / statute of regulations (such as labour laws, land acquisition act etc.)
- d. Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- e. Expenses incurred by the Company for one off event such as marathons / awards / charitable contribution / advertisement / sponsorships of TV programs etc.

**ANAND NVH PRODUCTS PVT LIMITED**

DOC NO: CSR-M-01

EDITION: 02

**CORPORATE SOCIAL RESPONSIBILITY POLICY MANUAL**

REV DATE: 02/09/2026

- f. Other contributions / expenses not recognized under the Act / Rules as amended or modified, from time to time.
- g. Any CSR projects/programs or activities undertaken outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level
- h. The activities undertaken in pursuance of normal course of business of a company.

**L. IMPLEMENTATION**

The company shall participate in CSR projects/ programme either independently or through a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company or a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government in conformity with the requirements of the Act, Schedule VII thereto and the Rules framed thereunder.

The company may enter into partnerships or alliances with NGOs, other Trusts, or other Corporate Foundations etc. to create a multiplier effect of its CSR programme / projects.

The company can also implement programme in collaboration with other companies such that the CSR Committees of respective companies are in a position to report separately on such programme and projects.

The company may engage international organizations for designing, monitoring and evaluation of the CSR projects or programme as per its CSR policy as well as for capacity building of their own personnel for CSR.

The board will oversee the implementation and monitoring of all CSR projects/programme.

The Board shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

**M. MONITORING**

The CSR Officer of the Company will coordinate / review the implementation of CSR activities at various areas and report to the Board.

Board prepares a draft annual report on CSR activities as per the specified format, in a board meeting to be held in the following year for finalization. The Board shall include in its report to the shareholders, the annual report on CSR activities as per the format specified under the Rules.

**ANAND NVH PRODUCTS PVT LIMITED**DOC NO: CSR-M-01  
EDITION: 02**CORPORATE SOCIAL RESPONSIBILITY POLICY MANUAL**

REV DATE: 02/09/2026

**N. REPORTING**

The Company will monitor progress of CSR projects and expenditure and will report impact to the Board from time to time. The Company is required to report its CSR performance in its annual Director's Report as per the structure and format prescribed in the notified CSR Rules of Section 135 of the Act.

**O. AMENDMENT IN CSR POLICY**

Any modification/ amendment in the CSR Policy shall be carried out by the Board of Directors of the Company.

A circular blue ink stamp with the text "Anand NVH Products Pvt. Ltd." around the top and "Authorised Signatory" around the bottom. A handwritten signature in blue ink is written over the stamp.