



Policy on Corporate Social Responsibility

1) Preface

This CSR Policy has been formulated in accordance with the provisions of Section 135 of the Companies Act, 2013 and the Companies (CSR Policy) Rules, 2014, as amended from time to time. It reflects the commitment of ADM Autotech India Pvt to contribute to sustainable social and environmental development, in addition to achieving its business objectives.

The Policy provides the guiding principles and framework for planning, approving, implementing, and monitoring CSR activities in compliance with the law.

2) Vision and Objectives

The vision of this CSR Policy is to ensure that ADM Autotech India Pvt Ltd's activities extend beyond business and include structured initiatives for the benefit and development of the community and society.

The objectives of this CSR Policy are to:

1. Define the projects, programs, and activities that ADM Autotech India Pvt Ltd shall undertake as part of its CSR.
2. Identify and describe the development areas in which ADM Autotech India Pvt Ltd will focus its CSR interventions.
3. Establish the governance and reporting structure for annual CSR management within ADM Autotech India Pvt Ltd.
4. Provide guiding principles for the selection, implementation, and monitoring of annual CSR activities.
5. Describe the process for the utilization of surpluses arising out of CSR activities.
6. Ensure alignment with applicable legal provisions, including Section 135 of the Companies Act, 2013, and the Companies (CSR Policy) Rules, 2014, as amended from time to time.
7. Enable the preparation of an Annual Action Plan for CSR in compliance with applicable rules.

3) Alignment with Company Values

The CSR Policy is an extension of the core values of ADM Autotech India Pvt Ltd and reflects the belief that true business success stems from creating shared value for both ADM Autotech India Pvt Ltd and society. In this spirit, the CSR approach of ADM Autotech India Pvt Ltd is aligned to the following principles:

- **Accountability:** Taking responsibility for creating measurable and meaningful impact in society through CSR initiatives.
- **Diversity and Inclusion:** Actively seeking out and valuing different perspectives to design inclusive programs.

- **Collaboration:** Partnering with credible organizations to ensure that CSR activities are effective, sustainable, and aligned with community needs.

Through these values, ADM Autotech India Pvt Ltd reaffirms its commitment to conduct CSR activities not only as a statutory obligation but also as a reflection of its corporate ethos and long-term responsibility to society.

4) Applicability

This Policy is applicable to ADM Autotech India Pvt Ltd, which is mandated to spend on CSR in accordance with Section 135 of the Companies Act, 2013, read with the applicable rules and amendments.

5) Scope of CSR Activities

CSR activities undertaken by ADM Autotech India Pvt Ltd shall be in line with the activities prescribed in Schedule VII of the Companies Act, 2013. The detailed list of eligible activities is provided in **Annexure I** to this Policy.

All CSR activities will be in addition to the normal course of business and will not include activities undertaken solely for the benefit of employees or their families, nor activities carried out outside India.

6) Governance Structure

The governance of CSR within ADM Autotech India Pvt Ltd shall rest with the Board of Directors, which holds ultimate accountability for CSR activities. ADM Autotech India Pvt Ltd shall constitute a Corporate Social Responsibility Committee (CSR Committee) at the Board level in compliance with Section 135 of the Companies Act, 2013, as and when applicable.

The CSR Committee shall consist of the Directors of ADM Autotech India Pvt Ltd. The Secretary of ADM Autotech India Pvt Ltd shall act as Secretary to the Committee. The CSR Committee shall be supported by a CSR Team comprising Company representatives and, where applicable, representatives of the ADM Foundation or other execution partners.

7) Roles and Responsibilities

a) Role of the CSR Committee

The CSR Committee shall:

1. Formulate and recommend the CSR Policy to the Board of Directors.

2. Recommend specific CSR activities and the annual expenditure to the Board.
3. Institute a transparent monitoring mechanism for the implementation of CSR projects.
4. Periodically review and monitor the implementation of CSR projects and programs.
5. Perform such other responsibilities as may be delegated by the Board.

b) Role of the Board of Directors

The Board of Directors shall:

1. Approve the CSR Policy and ensure its disclosure on ADM Autotech India Pvt Ltd's website.
2. Approve CSR projects and budgets based on recommendations from the CSR Committee.
3. Ensure that ADM Autotech India Pvt Ltd spends at least 2% of its average net profits made during the three immediately preceding financial years on CSR activities.
4. Give preference to local areas around which ADM Autotech India Pvt Ltd operates for CSR activities.
5. Disclose details of CSR activities in the Annual Report of ADM Autotech India Pvt Ltd in the format prescribed under the Companies Act, 2013.

8) Structure for Conducting CSR

ADM Autotech India Pvt Ltd may undertake CSR activities through

1. The ADM Foundation- CSR Implementing Agency for ADM Autotech India Pvt Ltd,
2. registered trusts, societies, or Section 8 companies, or
3. directly where appropriate.

ADM Autotech India Pvt Ltd may also collaborate with group companies or other corporates for joint CSR initiatives, provided such collaborations comply with the Act and relevant rules.

9) Funding, Selection, and Monitoring

The Board of Directors shall earmark an annual budget for CSR activities, as recommended by the CSR Committee. Proposals from eligible implementing agencies shall be assessed based on defined criteria such as alignment with Schedule VII, credibility of the organization, and expected impact.

For each approved CSR project, implementing agencies will be selected based on statutory eligibility and alignment with CSR objectives. The CSR Committee, with support from the CSR Team, shall monitor the progress of CSR activities through regular reports, site visits, and review meetings. An annual CSR report shall be incorporated in the Board's Report in accordance with the prescribed format.

10) CSR Expenditure

CSR expenditure shall include all costs directly incurred for CSR projects approved by the Board. Expenditure outside the scope of Schedule VII shall not be counted as CSR expenditure.

Any surplus arising out of CSR activities shall not form part of the business profits of ADM Autotech India Pvt Ltd and shall be:

- Reinvested into the same project, or
- Transferred to the Unspent CSR Account and utilized in accordance with the Annual Action Plan, or
- Transferred to a fund specified in Schedule VII of the Act.

Unspent CSR amounts, if any, shall be transferred in compliance with the timelines prescribed under the Act.

11) Reporting and Disclosure

The CSR Policy, along with details of CSR projects and activities, shall be disclosed on ADM Autotech India Pvt Ltd's website. The Annual Report of ADM Autotech India Pvt Ltd shall include details of CSR expenditure, projects undertaken, and outcomes achieved, as required by law. The CSR Committee shall also submit a responsibility statement confirming compliance with the CSR Policy.

12) Meetings of the CSR Committee

The CSR Committee shall meet as and when required to review the progress of CSR activities, monitor the implementation of approved projects, and make recommendations to the Board of Directors. The Committee shall ensure that all statutory responsibilities under Section 135 of the Companies Act, 2013, are fulfilled. The frequency and agenda of meetings will be determined by the Committee based on operational requirements and the timelines of ongoing CSR projects.

13) Amendment

This Policy may be amended or modified at any time by the CSR Committee, subject to approval by the Board of Directors. Any amendments notified by the Ministry of Corporate Affairs shall automatically form part of this Policy.

14) Authorization

This CSR Policy has been adopted by the Board of Directors of ADM Autotech India Pvt Ltd at its meeting held on 10th October 2025

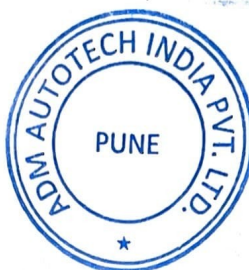
For ADM Autotech India Pvt Ltd



ASHISH CHOWDHARY

Managing Director

DIN: 08940144



Annexure I – Schedule VII CSR Activities (as amended)

In alignment with Schedule VII of the Companies Act, 2013, the following areas are eligible for CSR activities of ADM Autotech India Pvt Ltd:

- Eradicating hunger, poverty, and malnutrition; promoting preventive healthcare and sanitation; and making available safe drinking water.
- Promoting education, including special education and employment-enhancing vocational skills, particularly among children, women, the elderly, and differently abled persons, and supporting livelihood enhancement projects.
- Promoting gender equality, empowering women, setting up homes, hostels, and day-care centers for women, orphans, and senior citizens, and supporting projects that reduce inequalities faced by disadvantaged groups.
- Ensuring environmental sustainability, ecological balance, conservation of natural resources, and maintaining the quality of soil, air, and water.
- Protecting national heritage, art, and culture, including restoration of historical buildings and sites, support to public libraries, and promotion of traditional arts and handicrafts.
- Providing measures for the benefit of armed forces veterans, war widows, and their dependents.
- Promoting and supporting rural sports, nationally recognized sports, Paralympic sports, and Olympic sports.
- Contributing to funds established by the Central Government for socio-economic development and welfare of Scheduled Castes, Scheduled Tribes, other backward classes, minorities, and women.
- Supporting technology incubators located within approved academic institutions.
- Implementing rural development and urban poverty alleviation projects.