OLPAD AQUA LIMITED
(FORMERLY KNOWN AS OLPAD AQUA PRIVATE LIMITED)
CIN: U05005GJ2019PLC109438

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

(Pursuant to Section 135 of the Companies Act, 2013 read with the Companies (CSR Policy) Rules, 2014)

1. Introduction

This Corporate Social Responsibility Policy ("Policy") is framed in accordance with the provisions of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

The Company believes in conducting its business in a socially responsible manner and contributing towards sustainable and inclusive development of society, particularly for the benefit of economically weaker and underprivileged sections.

2. Objective of the Policy

The objectives of this Policy are:

- To lay down guidelines for undertaking CSR activities of the Company;
- To ensure compliance with statutory provisions relating to CSR;
- To contribute meaningfully in the areas of education and medical relief for the needy;
- To establish a transparent monitoring and reporting mechanism.

3. CSR Focus Areas

The Company shall undertake CSR activities in accordance with Schedule VII of the Companies Act, 2013. The primary focus areas shall include:

(A) Promotion of Education

- Financial assistance and scholarships to deserving students;
- Support to schools and educational institutions;
- Special education and skill development programs;
- Infrastructure development for educational institutions;
- Vocational training and livelihood enhancement initiatives.

(B) Medical Relief and Healthcare

- Providing financial assistance for medical treatment of economically weaker persons;
- Organizing medical camps and health awareness programs;
- Supporting hospitals, dispensaries, and charitable healthcare institutions;
- Preventive healthcare initiatives and access to essential medicines.

The Company may undertake such other CSR activities as may be permitted under Schedule VII from time to time.

4. Implementation of CSR Activities

The Company shall implement CSR activities through:

- A Trust / Society / Section 8 Company registered under applicable laws;
- An entity registered under Section 12A and 80G of the Income Tax Act, 1961;
- An entity registered with the MCA by filing Form CSR-l and possessing a valid CSR Registration Number.

The Company may enter into a Memorandum of Understanding (MOU) or agreement with the implementing agency specifying:

- Scope and objectives of the project;
- Amount of contribution;
- Utilization conditions;
- Reporting and monitoring requirements;
- Timelines for completion.

5. CSR Governance (CSR Committee Not Applicable)

In accordance with Section 135 of the Companies Act, 2013, where the CSR obligation of a company does not exceed Rs. 50 lakhs in a financial year, the requirement to constitute a CSR Committee is not applicable, but considering the nature and scope of its CSR activities, the Company has voluntarily constituted a CSR Committee.

The CSR Committee shall be responsible for, inter alia:

- Formulating, reviewing and recommending the CSR Policy to the Board for approval and amendment, as may be required;
- Identifying and recommending CSR projects and the corresponding expenditure for approval;
- Ensuring that the Company duly complies with its statutory CSR spending obligations;
- Monitoring the implementation of CSR projects and utilization of CSR funds; and
- Ensuring appropriate statutory disclosures in the Board's Report and other applicable filings.

6. CSR Committee

Our Board has constituted the Corporate Social Responsibility Committee vide Board Resolution July 30, 2026 in accordance with Section 135 of the Companies Act, 2013. The Corporate Social Responsibility Committee comprises of:

Name of the Directors	Nature of Directorship	Designation in Committee
Malek Nurularefin Irfan	Chairman and Managing Director	Chairman
Mohammed Farhan Mohammed Irfan Malek	Whole Time Director	Member
Aiyub Mohamed Yacoobali	Non-Executive Independent Director	Member

7. CSR Budget and Expenditure

The Company shall spend at least 2% of the average net profits of the three immediately preceding financial years, calculated in accordance with Section 198 of the Companies Act, 2013.

In case the Company fails to spend the required amount:

- The unspent amount relating to ongoing projects shall be transferred to an "Unspent CSR Account" within 30 days from the end of the financial year;
- Other unspent amounts shall be transferred to a Fund specified in Schedule VII within the prescribed time limit.

Excess CSR expenditure, if any, may be set off against future CSR obligations as permitted under applicable law.

8. Monitoring and Reporting

The Board shall ensure proper monitoring of CSR projects. The implementing agency shall provide:

- Periodic progress reports;
- Statement of utilization of funds;
- Supporting documents and completion reports.

Details of CSR activities shall be disclosed in the Board's Report in the prescribed format.

9. Exclusions

CSR activities shall not include:

- Activities undertaken in the normal course of business;
- Activities benefiting employees of the Company exclusively;
- Political contributions;
- Activities undertaken outside India, except as permitted under law.

10. Amendment of Policy

The Board of Directors may amend this Policy from time to time in accordance with statutory requirements and business needs.

11. Approval

This CSR Policy was approved by the Board of Directors of the Company at its meeting held on July 31, 2026 and shall be effective from August 01, 2026.

By order of the Board

FOR OLPAD AQUA LIMITED
(Formerly known as Olpad Aqua Private Limited)

Sd/-

Nurularefin Irfanbhai Malek
Chairman and Managing Director
DIN: 08531979