

# NCL HOLDINGS (A&S) LIMITED

## **Corporate Social Responsibility (CSR) Policy**

Pursuant to the provisions of Section 135 (3)(a) of the Companies Act, 2013, the CSR Policy of the Company formulated and recommended by the CSR Committee, and adopted by the Board is as follows:

### **1. Commitment to the Principles of CSR**

The Company is fully committed to the concept and principles of CSR in letter and spirit, and shall endeavour to play a meaningful role in discharging its responsibility.

### **2. Activities to be undertaken**

The company shall concentrate its efforts on the following CSR activities among those specified in Schedule VII to the Companies Act, 2013:

- Eradicating poverty/hunger/malnutrition, promoting healthcare/sanitation/safe drinking water
- Promoting education/employment enhancing vocational skills
- Setting up public libraries and development of traditional arts and handicrafts
- Promoting gender equality, empowering women, and measures reducing inequalities faced by socially and economically backward groups
- Development of social infrastructure in the neighborhoods of the company's registered office/project locations and rural development

### **3. Geographical Location**

85% of the CSR Funds shall be reserved for deployment in CSR activities within a radius of 50 kms from the location of the Registered Office or project sites of the Company.

### **4. Selection of Beneficiaries**

CSR projects/programmes and/or beneficiaries shall be selected by following a proper legal and financial due diligence process, by the Management of the Company under the guidance from the Board of Directors and CSR Committee, if any.

### **5. Criteria for Selection of Beneficiaries**

The following criteria shall be adopted before sanctioning any support from the CSR Fund:

Prospective beneficiaries should submit the following documents to the CSR Committee:

- The Charter Document, such as the Registration Certificate, Memorandum of Association, etc.
- A report on past activities before approaching the company for support.
- Details of the Project or Venture for which support is sought.

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- Measurable goals to be achieved specifying time-lines.
- Proposed budget for planned activities, including details of funds committed and any shortfall sought to be met by the contribution from the Company.

Recurrence of support to an existing beneficiary shall be considered only upon submission of a satisfactory report on performance.

## **6. Procedure for Sanctioning Support**

A formal request for contribution from the CSR Fund shall be made by the prospective beneficiary, along with the documents listed in the preceding section.

The prospective beneficiary will also have to disclose any association, if any, of any Director, executive, or employee, or their relatives with the beneficiary.

If no such association exists, a declaration must be made to confirm this.

The CSR Committee shall meet preferably once every six months to consider pending requests and allocate funds to aspiring beneficiaries. The CSR Committee may delegate some powers under this clause to the Managing Director, such as authority to approve identified CSR activities and allocation of funds. Whenever the funds are deployed/authorized pursuant to this delegation, the Managing Director shall furnish a report at the next meeting of the Committee.

## **7. Monitoring Process**

To ensure effective implementation of CSR activities and programmes, an internal monitoring mechanism as approved by the CSR Committee will be established.

Internal Monitoring Mechanism shall ensure:

- Prior approval of the CSR Budgets
- Periodic reporting to the CSR Committee on the amounts spent and activities undertaken
- Annual review of CSR activities by the Board of Directors/the CSR Committee.

## **8. Negative Covenants**

The CSR Fund shall not be deployed for supporting activities that benefit any particular race, religion, caste, or community exclusively.