NALWA SONS INVESTMENTS LIMITED

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CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Preface

Policy Title	CSR Policy
Effective Date	13.02.2015
Authorised By	Board of Directors
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1.0 INTRODUCTION

Nalwa Sons Investments Limited has been engaged in carrying out strategic Corporate Social Responsibility aligned to the corporate philosophy of being a responsible corporate and giving back to society. Nalwa Sons Investments Limited will take responsibility for the ways the operations impact society and the natural environment. The Company focuses on achieving the triple bottom line i.e. people, planet and profit.

Although there is no standard definition of CSR, yet the definition articulated by World Business Council for Sustainable Development (WBCSD) is well accepted. The WBCSD defines CSR as 'A business commitment and contribution to the quality of life of employees, their families and the local community and society at large to support sustainable economic development'. Our efforts are to align with the above mentioned definition of CSR and invest rather than spend on CSR. Such investment on communities around the registered office and other area where it operates and other stakeholders impacted by business operations is intended to be carried out in a strategic manner.

Nalwa Sons Investments Limited (NSIL) recognizes that its business activities have a direct and indirect impact on the society. The Company strives to integrate its business values and operations in an ethical and transparent manner to demonstrate its commitment to sustainable development and to meet the interests of its stakeholders. The Company is committed to continuously improving its social responsibilities, environment and economic practices to make positive impact on the society.

NSIL is committed to undertake CSR activities in accordance with the provisions of Section 135 of the Companies Act, 2013 read with Schedule VII and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as may be amended from time to time.

2.0 APPLICABILITY

Corporate Social Responsibility Policy (CSR Policy) has been recommended by the CSR Committee and adopted by the Board of Directors at its meeting held on 13th February, 2015. This Policy shall be applicable w.e.f. 13th February, 2015.

3.0 VISION, MISSION & PHILOSOPHY

CSR initiatives are theme based and are for the holistic development of the community.

3.1 Vision Statement

To be admired and recognized as the Socially Responsible Corporate through processes linked to sustainable growth and development.

3.2 Mission Statement

To engage with various stakeholders along the triple bottom line approach and promote the concept of sustainable communities and in the process contribute towards inclusive growth.

3.3 CSR Philosophy

To address key social issues and encourage all stake holders to get engaged through focused sustainable programmes and initiatives with the aim of achieving the overall vision of NSIL of being admired and recognized as a Socially Responsible Corporate.

4.0 OUR MODEL OF SUSTAINABLE DEVELOPMENT



5.0 **DEFINITIONS**

- 5.1 "**Board**" means Board of Directors of the Company.
- 5.2 "Corporate Social Responsibility projects / activities" means and includes:
 - (i) Activities specified under Schedule VII to the Companies Act, 2013;

- (ii) Projects or activities undertaken by the Company in pursuance of the recommendation of the CSR Committee and approved by the Board as per this Policy subject to Schedule VII of the Companies Act, 2013.
- 5.3 "CSR Committee" means Corporate Social Responsibility Committee constituted by the Board pursuant to the provisions of Section 135 of the Companies Act, 2013.

6.0 CORPORATE SOCIAL RESPONSIBILITY (CSR) COMMITTEE

The overall CSR initiative will be managed and ensured by the CSR Committee (the Committee).

7.0 FOCUS AREAS:

The CSR policy will *inter-alia* focus on issues listed below:

- 7.1 To demonstrate good practices leading to sustainable business.
- 7.2 To develop partnerships with socially responsible organizations, concerned stakeholders and government institutions and engage in Public Private People Partnerships
- 7.3 To encourage communities to grow organically adopting sustainable models and promote social entrepreneurship.
- 7.4 To promote quality education both in the informal and formal education sectors.
- 7.5 To develop and nurture employable skills amongst youth both around our areas of interest and areas of influence through sustainable programmes.
- 7.6 To support government and non government promoted programmes and facilitate inclusive growth.
- 7.7 To deliver quality integrated health care programmes in the vicinity of our registered office by augmenting / supporting government services as also promoting preventive and primary health care programmes through partnerships with various stakeholders / institutions
- 7.8 To engage maternal and child health (MCH) programmes and reduce the maternal and child mortality rates around our registered office.

- 7.9 To reduce the incidence of HIV & AIDS and female feticide in the vicinity of our registered office and other area where it operates.
- 7.10 To undertake community income generating programs through the process of capacity building and market linkages.
- 7.11 To facilitate advocacy initiatives being undertaken by various stakeholders.
- 7.12 To work towards environment sustainability.

8.0 INTRERVENTIONS:

In line with the CSR philosophy and the focus areas, Nalwa Sons Investments Limited plans interventions on the field of education & vocational training, integrated health care, women empowerment, social projects, rural infrastructure development, environment sustainability, sports, preservation of art and culture, business of human rights, disaster management. They key thematic interventions in above areas include:

8. 1 Education & Vocational Training – 'Mission Education' (ME)

- 8.1.1 To provide quality education to the 'Out of school' children and facilitate their enrolment in government / private institutions;
- 8.1.2 To provide coaching facilities for the under-privileged;
- 8.1.3 To support education of differently able and provide them skills for employment as per their capacities;
- 8.1.4 To establish community libraries near manufacturing facilities
- 8.1.5 To develop and support skill training programmes and facilitate employment of students through direct engagement and through partnerships;

8. 2 Integrated Health Care – 'Mission Health for All' (HA)

- 8.2.1 To provide health services through static and mobile clinics;
- 8.2.2 To facilitate health care through education;
- 8.2.3 To address specific areas of high disease incidence like malaria, respiratory diseases and hepatitis etc.;
- 8.2.4 To improve sanitary conditions around its registered office;
- 8.2.5 To address the issue of maternal child health;
- 8.2.6 To support government initiatives like combating AIDS, TB, etc.;

- 8.2.7 To provide clean drinking water
- 8.2.8 To support initiatives toward combating female feticide through education and awareness campaigns

8.3 Women Empowerment - 'Mission Women Empowerment' (WE)

- 8.3.1 To promote women entrepreneurship;
- 8.3.2 To create greater awareness on women rights at work place and in communities:
- 8.3.3 To build capacities through various training models to include leadership training;
- 8.3.4 To engage with the United Nations and other international bodies on 'Women Empowerment Principles' and create greater awareness locally;

8. 4 Social Project - Mission Social Project

- 8.4.1 To engage in social projects like making sanitary napkins, adolescent health etc.
- 8.4.2 To engage in development of slum area.
- **8.5 Rural Infrastructure Development –** 'Mission Rural Infrastructure Development' (RID)
- 8.5.1 Develop rural arterial infrastructure in terms of roads, culverts, community centres etc;
- 8.5.2 Facilitate cleaning of water bodies and providing necessary infrastructure around the ponds close to manufacturing facilities;
- 8.5.3 Repair and further improve school / health care infrastructure to include government schools / institutions / hospitals;
- 8.5.4 Facilitate waste management;
- **8.6 Environment Sustainability –** 'Mission Environment & Ecological Protection' (MEEP)
- 8.6.1 Support climate change initiatives like initiate retrofit building projects, carbon sequestration through tree plantation and other methods;
- 8.6.2 Promote organic farming practices;

- 8.6.3 Support alternative sources of energy programmes especially solar energy projects;
- 8.6.4 Support water management processes;

8.7 Sports – 'Mission Sports' (MS)

- 8.7.1 To support rural sports;
- 8.7.2 To promote adventure sports;
- 8.7.3 To support Paralympics sports

8.8 Preservation of Art and Culture – Mission Art and Culture (A&C)

- 8.8.1 Support initiatives relating to preservation and promotion of art and culture;
- 8.8.2 Support government initiatives on preservation of old monument.

8.9 Business and Human Rights – 'Mission B & HR' (BHR)

- 8.9.1 To create awareness on issues relating to B&HR as articulated in the UN 'Protect, Respect, Remedy' framework;
- 8.9.2 To address issues along supply chain relating to the second pillar of 'Respect'.

8. 10 Disaster Management – Mission Disaster Management and Relief (DM)

8.10.1 – To provide relief in case of disaster.

9.0 RESPOSIBILITIES OF THE COMMITTEE:

- 9.1 The Committee will formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII.
- 9.2 The Committee shall recommend the amount of expenditure to be incurred on the activities referred to in Section 135(3)(a) of the Companies Act, 2013; and
- 9.3 The Committee shall monitor the Corporate Social Responsibility Policy of the Company from time to time.
- 9.4 The Committee shall institute a transparent monitoring mechanism for implementation of the CSR projects or programmes or activities undertaken by the Company.

10.0 MODALITIES OF EXECUTION:

- 10.1 The Committee will interact with the concerned State Officials/Government officials to confirm the areas for undertaking activities under CSR and ensure to avoid duplicity of the job;
- 10.2 The Committee will decide the priority of the activities to be undertaken under CSR;
- 10.3 The Committee will also interact with the CSR Implementing agencies for determining the activities to be undertaken;
- 10.4 The Committee will ensure that NSIL shall spend a minimum of 2% of its average Net Profits for the immediately preceding 3 financial years on CSR projects or activities.
 - In case, at least 2% of average net profit of the last 3 financial years is not spent in a financial year, reasons for the same will be specified in the CSR Report.
- 10.5 Based on the total activities to be undertaken the Committee will recommend the quantum of Budget for the year, the budget will be approved in accordance with Budget Policy;
- 10.6 Utilization Certificate with statement of expenditure duly certified by an Authorized Person/ Official of the Company will be submitted to the Committee;
- 10.7 The Committee will monitor and review the progress of activities undertaken/completed;
- 10.8 The Committee will also examine the proposal/requests submitted by various implementing agencies for grant of donation/Financial Assistance/ Sponsorship etc. and also submit its recommendation before the Head of the CSR Committee.

11.0 REPORTING

11. 1 The contents of this Policy shall be disclosed in the Board's report and will also be placed on Company's website. The Board's Report shall also include an annual report on CSR containing particulars specified in Annexure to Companies (Corporate Social Responsibility) Rules, 2014. CSR reporting will also be done as per current practices of reporting i.e. GRI framework or integrated reporting framework or framework as specified from time to time.

12.0 SURPLUS, IF ANY, GENERATED OUT OF CSR ACTIVITIES:

12.1 Any surplus generated out of the CSR activities will not form part of the business profits of the Company.

13.0 AMENDMENT

13.1 Any modification / amendment in the CSR Policy may be carried out by the Board on the recommendation of the CSR Committee. This policy will be subject to change as per amendment in the Companies Act, 2013, the Companies (Corporate Social Responsibility Policy) Rules, 2014 or any other applicable Rules, Regulations and Guidelines.

14.0 CONCLUSION

- 14.1 The above policy has been formulated with the aim of improving CSR performance and reaching out to a large segment of society as also to address environmental issues. The CSR policy will facilitate engaging in evolved CSR activities, streamline procedures and encourage greater participation. With a clear vision and appropriate acknowledgement the outcomes will be visible and the CSR activities will have an impact on the society. Such an impact will contribute toward our National goal of alleviating poverty and improving the human development index of the country.
- 14. 2 The Company will encourage volunteering and such engagement practice will be taken cognizance of while initiating performance reports of all employees. It should also be the endeavor of employees to provide all support to CSR activities and in the process ensure the Company's overarching vision "To be admired as a socially responsible corporate" is accomplished with adequate commitment and finesse.