

CORPORATE
SOCIAL
RESPONSIBILITY
POLICY

NAGA DHUNSERI GROUP LIMITED
(CIN: L01132WB1918PLC003029)

Corporate Social Responsibility Policy

The Companies Act, 2013 (the “Act”) requires that every Company having a net worth of Rs. 500 (five hundred) crore or more, or turnover of Rs. 1,000 (one thousand) crore or more or a net profit of Rs. 5 (five) crore or more during any financial year, shall ensure that the Company spends, in every financial year, at least 2% (two per cent) of the average net profits of the Company made during the 3 (three) immediately preceding financial years, in pursuance of its Corporate Social Responsibility (CSR) Policy.

The said Act also requires the formation of a CSR Committee who in turn will formulate and recommend to the Board, a CSR Policy.

Accordingly, the CSR policy of the Company is laid down as below:

Activities to be undertaken by the Company as specified in Schedule VII of the Act:

In terms of the Act, the Company can undertake activities as mentioned under Schedule VII of the Act in connection with the CSR activities.

The list of some of the activities as mentioned under Schedule VII of the Act inter alia includes the following:

- a) 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.
- b) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
- c) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- d) Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports.

The Company aims at focusing its CSR activities by extending financial support to Institutions for Education, Healthcare (including preventive health care), Sports, Empowering women etc.

Specification of modalities of execution of the policy:

The Company aims at carrying out various CSR activities through **Dhanuka Dhunseri Foundation (DDF)**:

DDF was established in 1972 and focuses on four major philanthropic areas:

- Promoting education by building schools, colleges, hostel and providing assistance for their maintenance;
- Empowering the girl child through education and other initiatives;
- Improving healthcare including preventive healthcare by distributing free medicines and setting up dispensaries, health centres and maintenance thereof and providing assistance to charitable hospitals;

- Promoting sports in different disciplines by establishing, operating and maintaining training institutions and facilities for the Sportsmen. Providing aids like scholarships, prizes or monetary support to enable the sportsmen to develop their sporting skills and to provide support in every manner which will enable the Sportsmen to participate in competitive events and tournaments.
- Focusing on community development through donations.

Implementation:

The Company to form a separate CSR cell comprising of a group of employees who will work out the total amount which is to be spent for the CSR activities for a particular financial year. The said proposal shall be placed by the CFO and CS of the Company, after their consideration, to the CSR Committee of the Company for their consideration and recommendation to the Board.

Further based on the projection given by the Dhanuka Dhunseri Foundation as the Board decides, the CSR committee will decide on the amount to be allocated to different activities out of the total amount determined to be allocated towards the CSR activities and the physical completion of the project and recommend the same to the Board.

Further the actual amount determined for being allocated towards the CSR activities along with the allocation of the same to different activities and the physical completion of the project will be decided by the Board of Directors of the Company based on the recommendation of the CSR Committee with such modifications as may be required.

Further after the approval of the Board in regard to CSR contribution, the Company will contribute towards the CSR activities as and when the implementing agency approaches the Company for the contribution. When approaching the Company, the agency should submit a utilization report in regard to the funds disbursed by the Company. The Company to obtain the utilization statement certified by the Chartered Accountant once the final contribution has been made.

Determination of the CSR amount:

The amount determined for allocation towards CSR activities in any one Financial Year (say X) to be placed at the meeting of the CSR Committee to be held in each Financial Year giving the computation details as per below format:

Particulars	Years		
	For P.Y. (X1)	For P.Y. (X2)	For P.Y. (X3)
Net profit as per books (1)			
Less: Adjustments as per Section 198(2) of the Companies Act, 2013 (2)			
Adjusted Net profit (1 – 2)	A	B	C
Average Adjusted Net profit : (A+B+C)/3			
Allocable Amount: 2% of Average Adjusted Net profit			

A Report comprising of the following information to be placed before the CSR Committee:

- Total amount proposed to be spent towards CSR activities,
- Amount allocated for each of the activities,
- Time target for each of the activities, and
- Amount actually spent for each of the activities.

The details of spending to be placed before the CSR Committee whenever required in the following format:

Activity	Amount allocated	Spent till date	Balance	Remarks

Progress Monitoring:

- a. The CSR Cell comprising of a group of employees of the Company as aforesaid should be delegated with the responsibility of monitoring whether the policy as laid down is achieved as per the estimates. They need to report the same to the CFO, who in turn would report the same to the CSR Committee.
- b. The CSR Committee will give their responsibility statement that the implementation and monitoring is in compliance with objectives and policy.
- c. The CSR Committee will monitor the progress of the annual action plan, their manner of execution, modalities of utilization of funds and implementation schedules along with details of need and impact assessment for projects, if required.

Reporting:

In case, the Company has failed to spend the two percent of the average net profit of the three immediately preceding financial years or any part thereof, the Company shall provide the reasons for not spending the amount in its Board report.

Communication:

The CSR policy of the Company can be viewed at the Company's website.