

**CORPORATE
SOCIAL RESPONSIBILITY POLICY OF
NEFAB INDIA PRIVATE LIMITED**

As approved by the Board at on the 18th of March 2022

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1. PREAMBLE

The Nefab Group is a global industrial packaging manufacturer specializing in complete packaging solutions that reduce their customers' total costs while minimizing environmental impact. The Group is a leading provider of packaging solutions within the segments of Telecom, Energy, Industry, Vehicles, Healthcare and Aerospace. Since its inception in 1949, Nefab has grown from a product-oriented company into a market-oriented company with a prominent position on the global packaging market.

Nefab is committed towards economic development while improving the quality of life of the workforce and their families as well as of the local community and society at large. The approach of the Company for implementation of the CSR activities will be oriented to identify and formulate projects in response to the need of society, devise transparent monitoring mechanism, and commit cent percent involvement to get desired results in a time bound manner.

2. TITLE AND APPLICABILITY

This policy encompasses the company's philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for understanding socially useful programmes for welfare & sustainable development of the community at large is titled as the 'Nefab India Private limited CSR Policy' ('Nefab').

The CSR Policy is formulated in accordance with the provisions of Section 135 of the Companies Act, 2013 and rules made thereunder and any amendments thereof from time to time.

This policy shall be effective from the date of its adoption and approval of by the Board of Directors of Nefab.

3. DEFINITIONS

The words and expressions used in this Policy are defined as under:–

- (a) **“Act”** means the Companies Act, 2013.
- (b) **“Annexure”** means Annexure appended to this Policy.
- (c) **“Board”** means Board of Directors of the Company.
- (d) **“Company” or “Nefab”** means Nefab India Private Limited.
- (e) **“CSR Committee”** means the Corporate Social Responsibility Committee

of the Board of Directors of the Company referred to in section 135 of the Act.

- (f) **“Corporate Social Responsibility (CSR)”** means the responsibility of the Company to undertake the projects and programmes relating to the activities covered under the subjects enumerated in Schedule VII of the Act and approved by the Board in pursuance of recommendations of the CSR Committee.
- (g) **“CSR Activities”** means the activities of the Company as per this Policy.
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- (h) **“CSR Rules”** means the Companies (Corporate Social Responsibility Policy) Rules, 2014 notified on 27th February, 2014 by the Government of India, Ministry of Corporate Affairs and any amendments thereof from time to time.

The words and expressions used and not defined in this Policy shall have the same meanings respectively assigned to them in the Act or CSR Rules.

4. CSR VISION STATEMENTS AND GUIDING PRINCIPLES

Vision: Nefab India Private Limited through its CSR initiatives is committed towards building a sustainable enterprise for the benefit of its present and future generations of stakeholders and will continue to enhance value creation in the society and in the community in which it operates as a Socially Responsible Corporation.

5. RESOURCES

5.1 FUNDING & ALLOCATION

For achieving its CSR objectives through implementation of meaningful & sustainable CSR programmes, Nefab shall endeavour to allocate the following as its Annual CSR Corpus:

- A.** 2% of average net profits made during the three immediately preceding financial years, as prescribed under the Companies Act, 2013 and the Rules made thereunder;
- B.** Any income arising therefrom; and
- C.** Surplus arising out of CSR activities.

All the expenditure relating to CSR shall be pre-approved by the CSR Committee. Unspent CSR amount, if any, shall be transferred to separate account in accordance with the applicable CSR Rules from time to time.

5.2 MODE OF IMPLEMENTATION

A. CSR programs, projects or activities, will be implemented through one or more of the following methods:

1. Directly by the Company
2. Any other Registered Trust, Society or Section 8 Company (i.e. Company registered under Section 8 of the Companies Act, 2013) with an established by the Central Government or State Government
3. Entity established under State legislature or an Act of Parliament.
4. Companies that are established under Section 8 of the Act, or a registered public society or registered trust under section 12A and 80G respectively of the Income Tax Act, 1961, and having a track record of at least three years in undertaking similar activities.
5. In collaboration with other organizations

B. The allocated CSR budget or Corpus will be utilized for CSR activities undertaken within India, which are not:

1. exclusively for the benefit of employees of the Company or their family members; or
2. Undertaken in pursuance of normal course of business of the Company.

6. CSR PLAN

Nefab shall prepare its Annual CSR Plan at the beginning of each Financial Year according to the availability of resources, on recommendation of the CSR Committee and approval of the Board.

The CSR activities (Projects / Programmes) which Nefab plans to undertake shall be the activities falling within the purview of Schedule VII of the Companies Act, 2013 as amended from time to time and does not include the activities undertaken in pursuance of normal course of business of the company.

Areas of Interest: Areas of Interest that The Company may undertake under the ambit of CSR are listed below:

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- (ii) Promoting education, including special education and employment enhancing vocational skills especially among children, women and the differently abled and livelihood enhancement projects;

(iii) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; day care centers and such other facilities and measures for reducing inequalities faced by socially and economically backward groups;

(iv) Ensuring environmental sustainability, ecological balance, protection of flora and fauna and conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;

(v) Protection of national heritage, art and culture; setting up public libraries; promotion and development of traditional arts and handicrafts;
(vi) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widow;

(vii) Training to promote rural sports, nationally recognized sports, paralympic sports and olympic sports;

(viii) Contributions to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;

(ix) A) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government;

B) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDG)

(x) Rural development projects;

(xi) Slum Area Development;

Explanation - For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force;

(xii) Disaster Management, including relief, rehabilitation and reconstruction activities.

7. CSR COMMITTEE

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. Accordingly, the constitution of CSR Committee formed by NEFAB is as follows:

1. MR. RAVIDRA SHENOY	MANAGING DIRECTOR
2. MR. MAHENDRA GUPTA	DIRECTOR
3. MR. OLIVER HUGES	DIRECTOR

Responsibilities:

1. Formulate and update our CSR policy, to be approved by the Board
2. Suggest areas of intervention to the Board
3. Approve projects that are in line with the CSR Policy
4. Put monitoring mechanism in place to track the progress of each project
5. Recommend the CSR expenditure to the Board who will approve it.

Invitees to the CSR Committee: The CSR Committee may, at its discretion, invite employees of the Company from time to time to participate in the meetings of the CSR Committee and assist the CSR Committee in the implementation of the CSR Policy. Invitees to the CSR Committee meetings shall be entitled to participate in the deliberations of the CSR Committee but will not be entitled to vote at the meetings of the CSR Committee

8. IMPLEMENTATION

The time period for implementation of the programme will depend on its nature, extent of coverage and the intended impact of the programme.

CSR Programs shall be implemented with active participation of the local community, wherever possible, and in consultation with the State Government for policy and strategic purposes and local administration at village, block and district levels for operational purposes, wherever applicable. These implementations will

also be synergized with the initiatives undertaken by the State Government, District Administration, Local Administration as well as Central Government Departments.

While all CSR programs will be focused in India, the Company shall give preference to the local areas.

While identifying long term programmes, all possible efforts shall be made to define the following:

- a. Programme objectives
- b. Baseline survey- It would give the basis on which the outcome of the programme would be measured.
- c. Implementation schedules - Timelines for milestones of the programme.
- d. Responsibilities and authorities
- e. Major results expected and measurable outcome.

Powers for approval

- a. Corporate Social Responsibility Committee (CSR Committee) of the Board shall formulate and recommend to the Board a CSR policy of the Company for a Financial Year including the amount of expenditure to be incurred on CSR programs, projects and activities.
- b. The Board shall, after taking into account the recommendations made by the CSR Committee, consider and approve the CSR Policy as it may consider appropriate.
- c. The Board of Directors of the Company shall ensure that Company spends the requisite amounts specified under the Companies Act, 2013 on CSR activities failing which it shall specify in its report the reason for not spending the amount.
- d. The Board or CSR Committee shall delegate necessary powers for execution and implementation of the CSR Policy. The delegation shall also include powers for meeting the requirements arising out of immediate & urgent situations.

9. MONITORING AND FEEDBACK

To ensure effective implementation of the CSR programmes, the Company shall put in place, suitable monitoring mechanism.

- a) The progress of CSR programmes under implementation will be reported to the Chairman of CSR Committee as and when required.
- b) CSR Committee shall periodically monitor the progress of CSR projects, programs and activities incorporated in the CSR Policy and to take such decisions as may be necessary.
- c) CSR Policy will be displayed on the Company's website.
- d) An Annual report on CSR containing the particulars as prescribed under the Companies (Corporate Social responsibility Policy) Rules, 2014 shall form part of Annual Report of the Company.

10. CAPITAL ASSETS

Capital asset acquired or created by CSR projects should be held by the beneficiaries of the said CSR project or a trust or a public authority for the benefits of all. The company should take appropriate measure to ensure that such assets are utilized for the purpose it was meant for and should not be transferred or disposed off without prior permission of the company.

11. REVIEW

The CSR Committee shall be fully responsible for the monitoring and review of the implementation of this policy in accordance with the applicable laws from time to time. The CSR committee shall provide recommendation as and when it deems necessary to the Board so as to amend/ modify/ revise the CSR Policy.

12. GENERAL

In case of any doubt with regard to any provision of the CSR Policy and also in respect of matters not covered herein, a reference should be made to the CSR Committee.

The Company reserves the right to modify, cancel, add, or amend its CSR Policy subject to the provisions of the Companies Act, 2013 and Rules framed thereunder.

RAVINDRA SHENOY
MANAGING DIRECTOR