

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR Policy)

Nava Bharat Ventures Limited

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Preliminary:

Nava Bharat Ventures Limited ("NBV") is committed towards betterment of society and environment with constant efforts to build and nurture long lasting relationships with members of the society in general and the communities around its manufacturing facilities in particular.

CSR Philosophy -

- Key business process for Company's sustained success and growth.
- Improving quality of life of the communities and stakeholders in general and communities around the Company's manufacturing facilities, in particular.
- Contributing to economic development of the society from which the Company draws resources for its operations.

Objective:

The main objective of this CSR Policy is to lay down guidelines and also make CSR as one of the key business drivers for sustainable development of the environment and the society in which the Company operates in particular and the overall development of the community at large.

Definitions:

- (1) "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in Section 135 of the Companies Act, 2013 ("the Act").
- (2) "CSR Policy" relates to the activities to be undertaken by the Company as specified in Schedule VII to the Act and the expenditure thereon excluding activities undertaken in pursuance of normal course of business of the Company.
- (3) "Corporate Social Responsibility" means and includes but is not limited to:



- a) Projects or programs relating to activities specified in Schedule VII to the Act; or
- b) Projects or programs relating to activities undertaken by the Board of Directors of a Company (Board) in pursuance of recommendations of the CSR Committee of the Board as per declared CSR Policy of the Company subject to the condition that such Policy will cover activities enumerated in Schedule VII of the Act or activities that may be incorporated in Schedule VII any time in future.

Constitution of CSR Committee:

Pursuant to Section 135 of the Companies Act, 2013, the Board of Directors of the Company is required to constitute a Committee of Directors called "Corporate Social Responsibility Committee" ("CSR Committee"). The CSR Committee shall carryout its duties as prescribed under the Act from time to time.

Scope:

The following are the thrust areas and activities covered thereunder:

Program	Activities
Health	Nava Bharat Eye centre
	Nava Bharat primary health centre
	Specialized medical camps
	Health Campaigns
	Safe drinking water plants
	Toilets in Government Schools
	Preventive healthcare



Education	Nava Bharat High School
	Brahmani Public School
	Digital/ Physical Infrastructure in Govt.
	Schools
	Free tutorials for economically backward
	students in Govt. schools
	 Supplementary Spoken English program
Livelihood	Nava Bharat Vocational institute
	Women Employment Centre
	Integrated Farmers' Service Centre

The CSR Committee may, from time to time, recommend other programs/ activities including donations for such activities as may be prescribed under the Act. The Committee may also recommend other activities which are beneficial to the communities at large regardless the same are not forming part of Schedule VII of the Act.

CSR Budget:

The budget for the CSR projects is reviewed and recommended by the CSR Committee and approved by the Board. The Board / Committee, as the case may be, shall ensure that the company spends such amounts as may be prescribed under the applicable act(s) / regulations / rules statutory/ regulatory or otherwise.

CSR Expenditure:

- CSR expenditure includes all expenses, whether direct or indirect, incurred on the programmes undertaken in accordance with the approved CSR budget / plan;
- ii. however, any expenditure other than as stated in point no. i above require specific ratification of the CSR Committee and Board; and



iii. any surplus generated from the CSR projects undertaken by the Company will be tracked and netted off from the CSR expenditure and such net amount only be reported as CSR expenditure.

Implementation:

The Company implements its CSR programmes through Company's personnel or through external implementing agencies or through any Trust and the Company may also partner with credible organizations – individually or as a consortium – to design, fund, implement and review projects.

The CSR activities will be implemented under the guidance and support of the CSR Committee and the Board. The CSR Committee ensures that the CSR policy is embedded across NBV's operations and the CSR initiatives are in line with this policy.

Monitoring & Reporting:

The fundamental goal is to see that all the programs and activities are positive and running successfully. The monitoring mechanisms include visits, meetings and progress/status reporting by the project teams/ Company's personnel or such other agencies as may be entrusted with.

The CSR Committee has power to:

- seek progress/ status reports; and
- depute an official from the Company or outside agencies to inspect the activities and ensure timely information,

from implementing agencies to whom/which the funds have been granted.



Review of Policy:

This policy may be reviewed from time to time and any changes, if necessary, be recommended by the CSR Committee and approved by the Board.

Information dissemination:

The CSR programmes undertaken by the Company may be disseminated through Company's website, Annual Reports and other appropriate modes.

Management Commitment:

The Board of directors, management and all employees subscribe to the philosophy of NBV's CSR policy.

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