

# NEO METALIKS LIMITED

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CIN- U27109WB2003PLC097231

## Corporate Social Responsibility (CSR) Policy

[This Policy is revised w.e.f.1<sup>st</sup> April 2021 in accordance with the Companies (Amendment) Act 2019 and Companies (Amendment) Act, 2020 and in accordance with Companies (Corporate Social Responsibility) Amendment Rules, 2021 dated 22nd January, 2021, issued by MCA]

### **[I] PREAMBLE:**

Neo Metaliks Limited (hereinafter called "the Company") and its people are committed to society, ecology and environment. The Company realises that it is not being generous by following the CSR Policy - but is only being relevant and meaningful to the society of which it is a corporate citizen.

The Company's Vision in this regard is "improving lives and collective development of society in general and of the needy in particular ". NML also believes in sustainable development and caring for the environment.

With the above vision, NML will meticulously choose projects for its CSR activities.

### **[II] CSR POLICY OBJECTIVE**

The objective of this Policy is not only to guide the Company and its people to **pursue relevant** social activities but also to integrate the business processes with social processes.

This Policy shall be applicable to all CSR initiatives undertaken by the Company in pursuance of the requirements of Section 135 and Schedule VII of Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (including any statutory modifications, amendments, or re-enactments of any of them for the time being in force)

### **[III] GENERAL POLICIES**

#### **CSR COMMITTEES**

The Company's CSR committee consists of three directors, out of which at least one shall be Independent director. The Composition is as follows:

1. Ms Rupanjana De	Independent Director	Chairperson
2. Sri Ravi Agarwal	Director	Member
3. Sri Ramesh Agarwal	Director	Member

The Board shall reconstitute the CSR Committee as and when required inter alia, to comply with the provisions of the Companies Act, 2013 and applicable statutory requirements.

- 1) The Committee referred above shall-
  - a) Formulate and recommend necessary changes in the CSR Policy which shall indicate the activities to be undertaken by the company.
  - b) Recommend the amount of expenditure to be incurred on the activities, as per CSR Policy
  - c) Be responsible for planning, implementation and monitoring of CSR projects or activities of the company.
  - d) Any act required to be done under Companies Act, 2013 and the Companies (CSR Policy) Rules, 2014 as amended time to time.
  - e) Any other matter/thing as may be considered expedient by the members in furtherance of and to comply with the CSR Policy of the Company.
- 2) The expenditure in CSR Project shall be Project based with specific timeframes.
- 3) As far as possible, the Company shall strive to create self-sustainability in its CSR efforts, that is to say, over a long run, a CSR Project should be able to generate sufficient resources, whether by way of profits or by way of a regular flow of contributions, so that it does not have to depend on the Company's contribution on a regular basis.
- 4) The Company will make every effort to sensitize its directors and employees to recommend to the CSR Committee meaningful projects in accordance with the Guiding Principles that may be taken up by the Company, under the supervision of the CSR Committee.
- 5) The company may form a Joint Council to carry out specific functions as delegated by the CSR Committee. The council may be formed with delegates from each dept., Chief Operating Officer, Local people, Unions, HR & IR person, Gram Panchayat etc. as deemed fit.
- 6) The Committee shall approve to undertake CSR activities, if necessary, in collaboration with NML/other Companies/firms/NGOs/Trust etc., and to separately report the same in line with the CSR Rules
- 7) The CSR Committee shall also formulate and recommend to the Board, an annual action plan in pursuance of its CSR Policy, which shall include the following, namely:-
  - a. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
  - b. the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
  - c. the modalities of utilisation of funds and implementation schedules for the projects or programmes;
  - d. monitoring and reporting mechanism for the projects or programmes; and
  - e. details of need and impact assessment, if any, for the projects undertaken by the company;

The Board may also alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.]

#### **[IV] CSR PROJECTS AND THEIR MANNER OF SELECTION:**

1. A CSR Project may be selected by the CSR Committee, either based on its own discretion, or based on recommendations by any stakeholder as mentioned above.
2. The CSR Committee, after identifying and approving a CSR Project, may fix a target spending, and direct the CSR Cell to carry out the execution thereof.
3. The CSR Committee shall periodically monitor and evaluate the performance of the Projects and the achievement of targets.

NML would carry out the CSR activities within the scope of the following activities (In line with Schedule VII of Companies Act, 2013):

- i. Eradicating hunger, poverty and malnutrition, [“promoting health care including preventive health care”] and sanitation [including contribution to the Swatch 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 vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- iii. 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.
- iv. Ensuring environmental sustainability, Ecological balance, Protection of flora and fauna, Animal welfare, Agroforestry, 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 including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art 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 widows];
- vii. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports
- viii. Contribution to the prime minister's national relief fund [or Prime Minister’s Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, 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; and

(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 Organisation (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 (SDGs).]

- x. Rural development projects]
- xi. Slum Area development.
- xii. Disaster Management, including relief, rehabilitation and reconstruction activities.
- xiii. Any other areas as notified by MCA from time to time.

### **EXCLUSION FROM CSR**

The following activities shall not form a part of the CSR activities of the Company:

- i. The activities undertaken in the normal pursuance of the normal course of business of a Company.
- ii. CSR activities/programs or activities that benefit only the employees of the Companies and their families.
- iii. Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
- iv. Any CSR projects/programs or activities undertaken outside India or under any other statute.

### **[V] CSR EXPENDITURE / BUDGET**

The Company shall spend at least 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years in accordance with the Act and the Rules and the CSR Policy read with the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (as amended from time to time). The Company may also contribute to registered trusts/ societies towards its corpus for projects approved by the Board. The CSR Committee will recommend the CSR budget to the Board, for its approval and for effective execution.

For an ongoing project, if any amount budgeted to be spent for the year remains unspent then such an unspent amount will be transferred to the Unspent Corporate Social Responsibility account opened with a scheduled bank by the Company within 30 days from the end of the financial year and such amount shall be spent by the Company in pursuance of its' CSR obligation within a period of three financial years from the date of the transfer to the unspent CSR account. For other projects, such amount will be transferred to a fund specified in Schedule VII within 6 months of the expiry of the financial year. Any surplus arising out of the CSR Projects or Programs or activities shall not form part of the business profit of the Company and will be ploughed back into the

project in the current Financial Year or be allocated for an ongoing project to be spent in any of the three succeeding financial years or will be transferred to a fund specified in Schedule VII. Any excess expenditure i.e., beyond the prescribed CSR budget will be disclosed in the Board's CSR Report and shall be made available for set off against the CSR requirement to spend in any of the three succeeding financial years. The Board of Directors will satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer will certify the same to that effect.

In case any of the CSR Activities to be undertaken are anticipated to be long term i.e. an ongoing project being of a term of 3 (three) years excluding the financial year in which it was commenced, then a detailed estimate on implementation schedule or milestones should be submitted by the CSR Committee to the Board

- a) The board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.
- b) The CSR amount may also be spent by a company for creation or acquisition of a capital asset, which as per law shall be held by –
  - ✓ a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number under sub-rule (2) of rule 4; or
  - ✓ beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
  - ✓ a public authority:

## **[VI] IMPLEMENTATION**

### **Implementation Strategy**

The CSR projects/ activities can be implemented in the following ways:

The CSR Activities may be undertaken by the Company directly through its Implementation team or with the prior approval of the Board of NML, through any of the following entities as "Implementation Agency" being duly registered with the Central Government and having a unique CSR Registration Number (with effect from 1 April 2021):

- (i) Company established under section 8 of Indian Companies Act 2013, or registered public Trust, or registered Society registered under section 12-A and 80-G of the Income Tax Act 1961, being established by the Company, either singly or along with any other company;
- (ii) Company established under section 8 of Indian Companies Act 2013, or registered public Trust, or registered Society, being established by (Indian) Central Government or (Indian) State Government;
- (iii) Company established under section 8 of Indian Companies Act 2013, or registered public Trust, or registered Society registered under section 12-A and 80-G of the (Indian) Income Tax Act 1961, and having an established track record of at least three years in undertaking similar CSR activities; or

- (iv) Any entity established under an act of (Indian) Parliament or a (Indian) State Legislature.

Every project will specify the implementation schedule indicating the starting date, date of completion and likely benefits etc.

The CSR expenditure should be project based and for every project time framed periodic milestones should be finalized at the outset.

### **[VII] AUDIT**

The expenditure through 3<sup>rd</sup> party shall be verified / audited and a report to be placed before the CSR Committee by the person / authority decided by the CSR Committee.

### **GENERAL**

- (i) Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from the Government, from time to time.
- (ii) The Company reserves the right to modify, cancel, add, or amend any of these Rules.

**Place: Kolkata**

**Date: 27-02-2023**

**Sd/-  
Ms Rupanjana De  
Chairperson of CSR Committee**