

NCL Buildtek Limited
(Formerly NCL Alltek & Seccolor Limited)

CSR POLICY

Pursuant to the provisions of Section 135 (3)(a) of the Companies Act, 2013, the CSR Policy of the Company formulated and recommended by the Corporate Social Responsibility Committee, and adopted by the Board is as follows:

1. Commitment to the principles of Corporate Social Responsibility

The Company is fully committed to the concept and principles of Corporate Social Responsibility in letter and spirit, and shall endeavor to play a meaningful role in discharging its responsibility.

2. Activities to be undertaken:

The company shall concentrate its efforts on the following CSR activities among the activities specified in Schedule VII to the Companies Act, 2013.

1. Eradicating poverty/hunger/malnutrition, promoting healthcare/sanitation/safe drinking water
2. Promoting education/ employment enhancing vocational skills
3. Setting up public libraries, development of traditional arts and handicrafts
4. Promoting gender equality/empowering women and measures reducing inequalities faced by socially and economically backward groups
5. Development of social infrastructure in the neighborhood of company's plant locations and rural development.

3. Geographical Location.

85% of the CSR Funds shall be reserved for deployment in the CSR activities within a radius of 50 kms from the location of the plants or project sites of the Company.

4. Selection of Beneficiaries:

At least 50% of the CSR funds shall be earmarked for supporting institutions and entities which are already beneficiaries of the company's voluntary CSR efforts. This policy is consciously adopted to ensure sustained development of such institutions and entities.

However, such support shall be extended only after receiving a detailed report of the institutions/entities concerned, and the Committee is satisfied with the performance of the beneficiary.

5. Criteria for selection of Beneficiaries:

For institutions and entities other than the those coming under Para 4 above,, the following criteria shall be adopted before sanctioning any support from the CSR Fund:

The prospective beneficiary should submit to the CSR Committee, the following documents:

- i. The Charter Document like the Registration Certificate, Memorandum of Association etc.
- ii. A report on the past activities before approaching the company for support.
- iii. Details of the Project or Venture for which the support is sought.
- iv. Measurable goals to be achieved specifying time-lines.

- v. Proposed budget for the activities planned, and the details of funds committed, and the shortfall sought to be met by the contribution from the Company

Recurrence of the support to an existing beneficiary shall be considered only upon it submitting a satisfactory report on performance.

6. Procedure for sanctioning Support

A formal request for contribution from CSR Fund shall be made by the prospective beneficiary, along with the documents listed in Para 6 above.

The prospective beneficiary will also have to make a full disclosure of the nature of association, if any, of any Director, executive or employee or their relatives with the beneficiary. In case such association does not exist, a declaration that no such association exists shall be made.

The CSR Committee shall meet preferably once in six months to consider the pending requests, and make allocation of funds to the aspiring beneficiaries.

The CSR Committee may delegate some of the powers under this clause to the Managing Director viz., Authority to approve the identified CSR activities, Allocation of funds Etc. As and when the funds are deployed/ authorized pursuant to this delegation, the Managing Directors shall furnish a report at the next meeting of the Committee.

7. Monitoring process

For an effective implementation of CSR activities and programmes, an internal monitoring mechanism as approved by the CSR Committee will be put into force.

Internal Monitoring Mechanism shall ensure the following:

- (i) Prior approval of the CSR Budgets
- (ii) Periodic reporting to CSR Committee on the amount spent and activity/ies undertaken
- (iii) Annual review of CSR activities by the Board of Directors/ the CSR Committee.

8. Negative Covenants:

The CSR Fund shall not be deployed for supporting activities which are meant for the exclusive benefit of any particular race, religion, caste or community.

Policy adopted by the Board of Directors in their meeting held on 27th February 2015.

Policy Amended by the Board of Directors in their meeting held on 12th November 2020.