PREAMBLE:
India is one of the largest growing economies in the world. However, it continues to be deluged with various problems and challenges of poverty, health hazards, environmental degradation, illiteracy, poor educational standards, inadequate infrastructure, power crisis gender bias and the largest number of undernourished children as well as uneven distribution of wealth which many believe, is the root cause of social unrest.

The concept and need for Corporate Social Responsibility (CSR) has gained prominence from all avenues. The Government as well as regulators has framed various guidelines pertaining to responsibilities of business as well as the mandatory Corporate Social Responsibility provisions under the Companies Act, 2013. It is recognized that integrating social, environmental and ethical responsibilities into the governance of businesses ensures their long term success, competitiveness and sustainability. This approach also reaffirms the view that businesses are an integral part of society, and have a critical and active role to play in the sustenance and improvement of healthy ecosystems, in fostering social inclusiveness and equity, and in upholding the essentials of ethical practices and good governance.

PURPOSE:
This policy sets out the Company’s commitment & approach towards Corporate Social Responsibility based on our legacy of ‘Giving Back to Society’. The Company is committed to improving the quality of life of the communities we serve through the CSR theme of ‘Building Sustainable Livelihoods’. The Company endeavors to facilitate livelihood opportunities & socio-cultural development in areas of its operations. The Company intends to be a significant contributor to CSR initiatives in India by devising and implementing social improvement projects for the benefit of underprivileged communities, towns and villages and the Policy also envisages for the growth in and around the offices or factories of the Company. This policy, which encompasses’s philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful Programmes for welfare & sustainable development of the community at large, is termed as the “CSR Policy”.
FOCUS AREAS:

In accordance with the requirements of the Companies Act, 2013 (“the Act”), the Company’s CSR programs shall mainly focus on the following areas:

NRPL shall identify any one or more of the following areas for its CSR activities:

- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;

- Promotion of education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;

- Promotion of gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;

- 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;

- 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 arts and handicrafts;

- Measures for the benefit of armed forces veterans, war windows and their dependents;

- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;

- Contribution 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 Schedules Castes, the Scheduled Tribes, other backward classes, minorities and women;

- Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

- Rural development projects.

- Slum area development.
• Such other activities as the Board may consider being appropriate. Preference shall be given to local area and areas around NRPL for spending the amount earmarked for CSR.

**CSR COMMITTEE:**
The CSR Committee shall comprise three Directors namely.

1) Mr. Ravinder Kumar Agarwal
2) Mr. Anurag Agarwal
3) Mr. Amit Agarwal

**Roles and Responsibilities:**
- The CSR Committee of the Company shall be responsible for:
  
a. Formulating and recommending to the Board the CSR Policy which shall indicate activities to be undertaken in line with Section 135 read with Schedule VII of the Act.
  
b. Recommending to the Board the CSR expenditure to be incurred or the amount carried forward.
  
c. Monitor, Supervision & implementation of the CSR Policy from time to time

**RESPONSIBILITY OF THE BOARD OF DIRECTORS:**
The Board shall be responsible for –

- Approving the CSR policy of the Company as may be recommended by the CSR Committee, subject to necessary changes/modifications as the Board may deem fit.

- Ensuring that in each financial year the Company spends such amounts for CSR activities as may be decided by the board or the committee.

- Ensuring that the activities as are included in the CSR Policy are undertaken by the Company

**CSR BUDGET:**
The amounts to be spent by the Company shall be approved by the board considering the stipulations under the Act, as amended from time to time (presently 2% of the average net profits of the Company for the preceding three financial years). Any surplus arising out of
the CSR projects or programs or activities shall not form part of business profits of the Company.

CSR expenditure shall include all expenditure including contribution to corpus, for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity with the CSR Policy.

**IMPLEMENTATION & MONITORING STRUCTURE:**
CSR Programs of the company shall be undertaken through a three tier structure:

- Company level employees take up implementation of key initiatives, in association with like-minded partners in consultation with the management.
- Cross-functional CSR committee at corporate level helps initiate projects and provides support & monitoring.
- CSR committee at Board level provides broad direction for CSR planning to ensure desired impact.

**Project Monitoring –**

- The CSR committee will ensure that the CSR Policy is implemented as per the Act and the Rules ensuring that all projects as budgeted are duly carried out.
- All CSR spends will be closely monitored and audited in an accountable and transparent manner
- Project monitoring shall include periodic field visits, comprehensive documentation, and if required interaction with beneficiary communities.
- The CSR Committee shall periodically review the CSR project reports and the same shall be annually presented to the Board.

**STAKEHOLDER COMMUNICATION:**
We shall ensure relevant updates regarding our key projects and its impact through our Annual Report, and other relevant mechanisms from time to time.

**PROJECTS UNDERWAY:**
Our current and proposed CSR Activities are appended below:
1. **Promotion of Education:**
Company is endeavoring the promotion of education to the children belonging to poor family including employees. Company has provided books and stationeries to the poor school children near the vicinity of the factory.

2. **Eradication of Hunger, Poverty and Malnutrition and promotion of health:**
Eradicating hunger, poverty and malnutrition, promoting health care activities including preventive health care and sanitation and making available safe drinking water to the villages preferably in the vicinity of the offices or factories. The Company is also planning to expand its CSR project to other places.

**GENERAL**

In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to CSR Committee. In all such matters, the interpretation & decision of the Committee shall be final. 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 Government, from time to time. NRPL reserves the right to modify, add, or amend any of these Policy Rules/Guidelines.