

**CORPORATE SOCIAL RESPONSIBILITY
POLICY**

OF

**NUEVO POLYMERS PRIVATE LIMITED
HAVING CIN: U01403HR2012PTC051797**

AND

**HAVING REGISTERED OFFICE
ADDRESS:
W6/13, DLF PHASE-III,
GURUGRAM-122 002 (HARYANA) INDIA**

Preamble

Nuevo Polymers Private Limited, a company formed and registered under the provisions of The Companies Act, 2013 as private limited company as on 15th March, 2012 and presently having registered office at W-6/13, DLF Phase-III, Gurugram 122 002, Haryana, India (hereinafter referred as “Nuevo”/Company) engaged in the business of Guar Gum Powder (manufacturing and trading) across world and leading distributor in said field. Nuevo aims to carry out charitable objects and purpose wide enough for the extension of the benefit thereof to all, irrespective of class, creed and relief poor, education, medical relief and advance of any object of general and or public utility.

Management of Nuevo is also committed to contributing funds towards its societal responsibilities with/without statutory obligations.

Regulatory Framework:

The Companies Act, 2013 together with the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time (‘the Act’) and Schedule VII thereto now requires companies having net worth of INR 500 crore or more, turnover of INR 1000 crore or more or net profits of INR 5 Crore in immediately preceding FY or more to spend 2% of its average net profits. The Board to ensure that the CSR Policy shall always be in consonance with applicable provisions of Section 135 read with rules to the effect, if any and any variance in the policy from the applicable provision, will lead to a situation whereby the rule shall prevail and that part in the policy shall be rendered redundant/substituted automatically.

The amount is required to be spent in identified activities listed in Schedule VII to the Act. The said Schedule also provides a framework and the focus areas in which the amount is required to be spent including modalities thereto.

In line with the requirement of Act, Schedules and rules made there under, this Corporate Social Responsibility Policy (herein after referred to as “CSR Policy”) has been formulated and would be submitted to the Board with the recommendation of CSR committee for approval of the said policy. It may additionally be noted though that where the amount to be spent by a company under sub-section (5) does not exceed fifty lakh rupees, the requirement under sub-section (1) for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee, in

such cases, be discharged by the Board of Directors of such company. The Board may dissolve CSR committee at its own discretion at any given point of time.

A. PURPOSE

The purpose of Corporate Social Responsibility (CSR) Policy is to devise an appropriate strategy and focus for its CSR initiatives and lay down the broad principles on the basis of which it will fulfill its CSR objectives. The Board of Directors has constituted the Corporate Social Responsibility Committee ('Committee') and formulated this Corporate Social Responsibility Policy ('CSR Policy') in consonance with Section 135 of the Companies Act 2013 along with Companies (CSR) Amendment Rules 2021 with other necessary notification/circular for the purpose of CSR activities to be implemented and monitored by the Committee under overall supervision of the Board of Directors ('Board') of the Company. The other details / disclosure etc. that may be required are reproduced as hereunder :

II. Definitions

- (i) "the Act" means the Companies Act, 2013.
- (ii) "Board of Directors" or "Board" means the collective body of the directors of the Company.
- (iii) "Company" means "Nuevo Polymers Private Limited".
- (iv) "CSR Committee" means Corporate Social Responsibility Committee constituted by the Board of Directors of the Company.
- (v) "CSR Policy" means Policy on Corporate Social Responsibility of Nuevo Polymers Private Limited, framed in accordance with the relevant provisions of the Act.
- (vi) "CSR Rules" mean the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.
- (vii) "Implementing Agency" means any entity registered with Ministry of Corporate Affairs or notified as such for undertaking CSR projects, which may be engaged / selected by the company to implement projects in pursuance of CSR Policy.

Any term used in this policy but not defined herein shall have the same meaning assigned to them under the Act and CSR Rules as applicable to the Company.

B. CSR VISION

- Ensuring socio-economic development of the community and taking measures for empowering disadvantaged sections of the society particularly in the field of education and health care.
- Ensuring environmental sustainability through ecological conservation and regeneration.

- Consult local communities to identify effective and culturally appropriate development goals;
- Ensure efficient use of energy and environment friendly technologies;

C. CSR AREAS

1) Areas for CSR spending in accordance with Schedule VII of the Companies Act, 2013 will include the following: -

(i) Eradicating hunger, poverty and malnutrition, 2[“promoting health care including preventive health care”] and sanitation 4[including contribution to the Swachh 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 centres 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 4[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, 9[Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows];

(vii) training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports

(viii) contribution to the prime minister’s national relief fund 8[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;

10[(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]

3[(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.]

5[(xii) disaster management, including relief, rehabilitation and reconstruction activities.]

2) The activities mentioned above are to be interpreted liberally so as to capture the essence of the same. These areas are only illustrative and not exhaustive. The initiatives by the Company in the above fields may also include contribution to various projects engaged in these areas.

3) CSR expenditure shall include all expenditure for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, till the time it is into existence, but does not include any expenditure on an item not in conformity with the CSR Policy.

4) Though the Company would give preference to local area and areas around the Company for spending the amount earmarked for CSR, it would also work for the upliftment of underprivileged at large.

D. CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

The company has a Corporate Social Responsibility (CSR) Committee, constituted as per the provisions of Sec. 135 of the Companies Act, 2013 along with Companies Amendment Rules 2021 along with necessary notification/circular in this regard,

The composition of the Committee comprises of below stated :

Mr. Anurag Dadoo, Member

Mr. Atma Prakash Dadoo, Member

Mr. Yogendra Kumar Maheshwari, Member

Mr. Jaymangal Kumar, Member

The role and responsibility of the Committee will be as under:

- To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Companies Act 2013;
- To recommend the amount of expenditure to be incurred on various CSR activities in a financial year;

- To monitor the Corporate Social Responsibility Policy of the company from time to time.
- To decide on 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.

and shall work in accordance with terms of reference that may be assigned to it by Board and shall also work till the time of its existence as deem appropriate by the Board of Directors.

Also the CSR committee shall formulate and recommend to the Board, an annual action plan in pursuance of this 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:

Provided that Board may 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.]

E. BOARD OF DIRECTORS

The Board of Directors will be responsible for:

- Approving the CSR policy as formulated by the CSR Committee.
- Ensuring that in each Financial Year the Company spends at least 2% of the average net profit made during the three immediately preceding Financial Years. It is also made a part of policy that if Nuevo spends an amount in excess of requirement provided under sub-section (5) of section 135 , such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years subject to applicable conditions.

- Ensuring that in every Financial Year, funds committed by the Company for CSR activities are utilized effectively, and implementation is monitored on regular basis.
- Disclosing in the Annual Report, the names of the CSR Committee members, the content of the CSR policy and ensuring annual reporting of its CSR activities on the Company website, if any including furnishing of CSR report in prescribed format as prescribed by MCA.
- Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the company where it operates.

H. Review of CSR Policy

The Board shall have power from time to time to review and amend the CSR Policy as it may consider appropriate.
