

DCM NOUVELLE LIMITED

CIN: L17309DL2016PLC307204

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CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

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1. INTRODUCTION

The Board of Directors of DCM Nouvelle Limited (the “Company”) acting upon the recommendation of its Corporate Social Responsibility Committee, has adopted the following policy and amended the same from time to time with regard to the Company’s Social Responsibility:

2. VISION & POLICY STATEMENT

Corporate Social Responsibility is a Company's commitment to operate in an economically, socially and environmentally sustainable manner, while recognizing the interests of its stakeholders. This commitment is beyond statutory requirements.

Corporate Social Responsibility is, therefore, closely linked with the practice of Sustainable Development. Corporate Social Responsibility extends beyond philanthropic activities and reaches out to the integration of social and business goals.

These activities need to be seen as those which would, in the long term, help secure a sustainable competitive advantage.

The CSR Committee will annually recommend the CSR programmes and projects to the Board for its approval. The Board of Directors of the Company through its CSR Committee will plan and monitor the expenditure of CSR activities.

3. GOVERNANCE

- DCM Nouvelle Limited has formulated CSR Policy in consonance with Section 135 of the Companies Act, 2013 read with the CSR Rules notified by the Ministry of Corporate Affairs, Government of India.
- This Policy shall apply to all CSR projects / programmes undertaken by the Company in India as per the Companies Act, 2013.

4. DEFINITIONS

“Act” means the Companies Act, 2013, as amended from time to time.

“Administrative overheads” means the expenses incurred by the company for ‘general management and administration’ of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme;

“Board” means the Board of Directors of the Company.

“Company” means ‘DCM Nouvelle Limited’.

“CSR” means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the rules therein.

“CSR Committee” means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act;

“CSR Rules” means Companies (Corporate Social Responsibility Policy) Rules 2014 and amendments thereon.

“CSR Policy” means a statement containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan;

“International Organisation” means an organisation notified by the Central Government as an international organisation under section 3 of the United Nations (Privileges and Immunities) Act, 1947(46 of 1947), to which the provisions of the Schedule to the said Act apply;

“Net profit” shall have the meaning as defined in the Rules 2 (h) of (Corporate Social Responsibility Policy) Rules, 2014Rules.

“Ongoing Project” means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification;

5. APPLICABILITY

This policy shall apply to all CSR initiatives and activities taken up preferably in the local area and around various workplace(s)/ factory(ies) /project site(s) and location(s) of the Company for spending the amount earmarked for CSR.

6. OBJECTIVE

- 6.1 To lay down the guidelines for the Company to evolve its relationship with society by way of social and economic contribution and by giving back to the society for the resources it used to flourish by adoption of appropriate business processes and strategies.
- 6.2 To fulfill the directives of the Companies Act, 2013 enjoining prescribed companies to develop and implement a CSR policy specifying the activities to be undertaken by the Company.
- 6.3 To prepare list of activities, programmes and projects to be undertaken during the implementation year, specifying modalities of execution and implementation schedules for the same.

7. CSR COMMITTEE

The Corporate Social Responsibility Committee (CSR Committee) is the governing body that will articulate the scope of CSR activities for the Company and ensure compliance with the CSR Policy in compliance with Section 135 of the Companies Act, 2013 and the relevant Rules, the Board of Directors has constituted a CSR committee of the Board.

The committee is entrusted, *inter alia*, the following tasks:

- (a) Formulate and recommend to the Board, a Corporate Social Responsibility Policy (CSR Policy) which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Act.
- (b) Monitor the Corporate Social Responsibility Policy of the Company from time to time.
- (c) *Recommend* the amount of expenditure to be incurred on the activities referred to in clause (a) above.
- (d) *Institute* a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the company.
- (e) *Perform such other functions as may be necessary under any statutory or other regulatory requirements to be performed by the Committee and as delegated by the Board from time to time.*

This Corporate Social Responsibility Policy has been formulated and recommended by the CSR Committee of the Company pursuant to the provisions of Section 135(3)(a) of the Act, Schedule VII of the Act and the rules made there under.

8. AREAS OF ACTIVITIES TO BE UNDERTAKEN.

The Company may undertake any one or more of the following activities, as mentioned in the Schedule VII of the Companies Act, 2013 and Rules thereunder, as may be recommended by the CSR Committee of the Board and as approved by the Board of Directors from time to time depending on the resources and opportunities available:

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for 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, agro forestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the clean Ganga Fund setup 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;
- vi. promotion and development of traditional arts and handicrafts;
- vii. Measures for the benefit of armed forces veterans, war widows and their dependents;
- viii. Training to promote rural sports, nationally recognised sports, Paralympic and Olympic sports;
- ix. 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 scheduled castes, the scheduled tribes, other backward classes, minorities and women;
- x. Contribution or funds provided to technology incubators located within academic institution which are approved by the Central Government;
- xi. Rural development projects;
- xii. Slum area development;

Explanation: For the purpose of this team, the term 'slum area' shall mean any area declared as such by Central/State Govt. Or any other competent authority under any law from time to time being in force

- xiii. Any activity(ies), which may be included as per amendment in the Schedule VII of the Act from time to time.

9. ACTIVITIES NOT TO BE TAKEN UP UNDER CSR PROGRAMME

- 9.1 Activities undertaken in pursuance of normal business of the Company
- 9.2 Any project not in conformity or not in line with activities mentioned above.
- 9.3 Any projects or programs or activities that benefit only the employees of the Company and their families.
- 9.4 Any programmes or activities of a political party.
- 9.5 Activities as obligation or for fulfillment of any requirements under an Act or Statute or Regulations (such as Labour Laws, Land acquisition Act, etc.)
- 9.6 One-off events such as marathons/ awards/ charitable contribution/ advertisement/ sponsorships of TV programmes, etc.

10. MODE OF EXECUTION

The activities will be executed directly or through a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or in collaboration with other companies or may engage international organizations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR policy as well as for capacity building of their own personnel for CSR and Such Entities shall having an established track record of at least three years in undertaking similar activities

11. TERRITORY FOR CSR SPEND

The Company should give preference to the local area and areas around the project sites, registered office, branch offices and administration offices of the Company for spending the amount earmarked for CSR activities. The activities will be restricted to the geographical boundaries of India.

12. THE CSR BUDGET

The amount of expenditure to be spent for CSR and the projects, programmes or activities undertaken in each financial year will be recommended by the CSR Committee of the Company and the same will be approved by the Board of Director preferably together with the Annual Budget.

If in any financial year the Company couldn't spend the budgeted amount due to any reason whatsoever, the unutilized amount will be treated as per the provisions of Section 135 of the Companies Act, 2013 read with the relevant rules, as amended from time to time.

13. RESPONSIBILITIES OF BOARD:

- The Board shall satisfy itself that the funds so disbursed have been utilized for the purpose and in the manner as approved by it.
- The CFO or the person responsible for the financial management shall certify to the effect.
- In case of an ongoing project, the board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modification, if any required.

14. CSR MONITORING AND REPORTING MECHANISM

The CSR Committee shall monitor the amount of expenditure as approved by the Board of Company. Apart from the above, the Directors' Report of the Company shall include an annual report on CSR containing the particulars in the prescribed format.

15. DISPLAY OF THE CSR POLICY IN THE WEBSITE OF THE COMPANY

The Board of Directors of the Company shall mandatorily disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.

16. MODIFICATION/ AMENDMENTS

The Board of Directors may in their discretion and on recommendation of the CSR committee, make any changes/modifications and/or amendments to this Policy from time to time. In the event of any conflict between the provisions of this Policy and of the Act or any other statutory enactments, rules, the provisions of such Act or statutory enactments, rules shall prevail over and automatically be applicable to this Policy and the relevant provisions of the Policy would be amended/modified in due course to make it consistent with the law.

The Policy has been approved by the Board of Directors of the Company on May 15, 2019 and subsequently amended 26.03.2021.

For DCM Nouvelle Limited

**Sd/-
Managing Director**