

Corporate Social Responsibility Policy

Introduction

Mandava Holdings Private Limited (MHPL) being the leading NSL group Company is involved in investments in Subsidiaries, Associates and Joint Ventures etc. The group is diversified into various sectors and forms different group companies.

MHPL is vigilant in its enforcement towards corporate principles and is committed towards sustainable development and inclusive growth. The Company constantly strives to ensure strong corporate culture which emphasizes on integrating Corporate Social Responsibility (CSR) values with business objective. It also pursues initiatives related to quality management, environment preservation and social awareness.

Section 135 of Companies Act, 2013 ("the Act") mandates every company having a net worth of Rs. 500 Crore or more or revenue of Rs. 1,000 Crore or more or net profit of Rs. 5 Crore or more shall constitute a Corporate Social Responsibility (CSR) Committee and the CSR Committee is responsible for formulating Company's CSR policy and monitoring the CSR programs and their performance.

CSR Policy

This Policy shall be read in line with Section 135 of the Companies Act 2013, Companies (Corporate Social Responsibility Policy) Rules, 2014 and such other rules, regulations, circulars, and notifications (collectively referred hereinafter as 'Regulations') as may be applicable and as amended from time to time.

MHPL believe that the actions of the organization and its community are highly inter-dependent. Both on its own and as part of NSL Group, through constant and collaborative interactions with our external stakeholders, NSL strives to become an asset in the communities where it operates. As our Corporate Social Responsibility (CSR) we actively implement Projects and initiatives for the betterment of society, communities, and the environment.

Scope

This policy shall be applicable to all CSR initiatives and activities undertaken by MHPL and its Subsidiaries, Associates and Joint Ventures etc. either directly or through corporate foundations/trusts/other charitable organizations for the benefit of different segments of the society. The following are the key elements of the policy:

- Initiate projects that benefit communities;
- Encourage an increased commitment from employees towards CSR activities and volunteering.
- Generate goodwill in communities where NSL operates or are likely to operate;
- Vision and framework of Corporate Social Responsibility and its approach towards the same.
- Key focus areas for engagement and our Goals
- Overview of the implementation strategy of various CSR initiatives
- Governance Structure
- Funding, Selection and Monitoring Process

Structure

The Corporate Social Responsibility Committee is responsible to formulate and recommend to the Board:

- the CSR Policy indicating the activities falling within the purview of Schedule VII to the Companies Act, 2013 and the Annual Action Plan to be undertaken by the Company,
- to recommend the amount to be spent on CSR activities recommended by the CSR Committee,
- to monitor the CSR Policy periodically,
- the manner of execution, modalities of utilization of funds, and
- Implementation schedules along with details of need and impact assessment for projects as required.

The CSR Committee of the Board of Directors comprises of the following Members:

1. Mr. P. Mohanaiah- Independent Director
2. Dr. P Kotaiah- Director
3. Mrs. M. Asha Priya-Whole Time Director

Corporate Social Responsibility Philosophy

MHPL subscribes to the philosophy of compassionate care and committed to act on the ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. Further the Company strives towards becoming a socially responsible corporate entity with a thrust on Community development, and education through sustained business conduct.

MHPL seeks to attain its CSR objectives in a professional and integrated manner, the Company has formulated policies for social development that are based on the following guiding principles:

- Adopting an approach that aims at achieving a greater balance between social development and economic development;
- Adopting new measures to accelerate and ensure the basic needs of all people including working towards elimination of barriers for the social inclusion of disadvantaged groups;
- Focusing on educating the girl child and the underprivileged by providing appropriate infrastructure, and groom them as future value creators;
- Assisting in skill development by providing direction and technical expertise to the vulnerable thereby empowering them towards a dignified life;
- Promoting an inclusive work culture;
- Working towards generating awareness for creating public infrastructure that is barrier free, inclusive and enabling for all including the elderly and the disabled;
- Promoting the wellbeing and development of employees and their families through an inspiring corporate culture that encourages good values;
- motivating employees of the Company to spend time volunteering on issues pertaining to CSR;
- Responding to emergency situations & disasters by providing timely help to affected victims and their families.

Focus Areas of Engagement

In accordance with the requirements under section 135 of the Companies Act, 2013, MHPL, CSR activities, amongst others, will focus on:

Hunger, Poverty, Malnutrition and Health: Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.

Education: Promoting education, including special education and employment-enhancing vocational skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies.

Rural Development Projects: Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.

Gender Equality and Empowerment of Women: Promoting gender equality and empowering women; setting up homes, hostels and day care centers for women and orphans; setting up old age homes and such other facilities for senior citizens; and adopting measures for reducing inequalities faced by socially and economically backward groups.

Environmental Sustainability: Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water.

National Heritage, Art and Culture: Protecting national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promoting and developing traditional arts and handicrafts.

Goals

Our goals include the following:

Sl. No.	Goal Area	Actions
01	Hunger, poverty, malnutrition and healthcare	MHPL will work with its subsidiaries, associates and joint ventures entities to improve livelihoods, addressing poverty, hunger and malnutrition and accessibility of quality healthcare and bring about improvement in awareness and health seeking behavior in various parts of India, enabling a better living, Key Initiatives includes: • Improving food security and enhancing nutrition; • Supporting poverty and malnutrition projects, promote preventive healthcare and sanitation, safe drinking water; • Primary, secondary and tertiary care facilities; • Conducting need-based health camps and providing consultation, medicines etc. • Working on maternal and child health.
02	Education	MHPL will focus to work on several educational initiatives to provide quality education, training, skill enhancement, Key Initiatives include: • Promoting primary and secondary education; • Promoting higher education including setting up and supporting universities; • Enabling higher education through merit cum means scholarships, including for differently abled across the country. • Skill development and vocational training.

03	Rural Development	We believe that the well-being of people living in rural areas ensures sustainable development. We will work with local administrations to achieve Community development goals and support them in improving infrastructure such as constructing roads, providing drainage systems and electricity, and rehabilitating natural-disaster affected victims in rural areas.
04	Gender equality, environmental sustainability, art and Culture	MHPL will among other things, focus on promoting gender equality and empowering women, ensuring environmental sustainability, ecological balance, protection of flora and fauna and protection of national heritage, art and culture including restoration of buildings and sites of historical importance.
05	Other Initiatives	To undertake other need-based initiatives in compliance with Schedule VII of the Companies Act, 2013.

Implementation of CSR Activities

MHPL will undertake its CSR activities, approved by the CSR Committee through:

- a) Directly or through a registered trust, society or Company established under section 8 of the Companies Act, 2013; or
- b) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961 established by the company, either singly or along with any other company, or
- c) a company established under section 8 of the Act or registered trust or a registered society, established by the Central Government or State Government, or
- d)) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.
- e) MHPL may also collaborate with other Companies or Institutions for undertaking projects or programs for CSR activities.

Governance

Corporate Social Responsibility (CSR Committee)

- a) MHPL's Board of Directors have formed a CSR Committee in accordance with the requirements of the Companies Act, 2013 and Rules made thereunder. This Committee is responsible for formulating CSR Policy and the decision making with respect to MHPL CSR policy.
- b) CSR Committee recommended the policy to MHPL Board of Directors and the Board of Directors have approved this policy.
- c) The CSR Committee to meet at least once a year to review the implementation of CSR projects/ programs, monitor and give suitable direction.

Budget

- a) The members of the Committee of the Board to ensure that minimum of 2% of average net profit of the three preceding years is spent on CSR initiatives undertaken by MHPL;
- b) All expenditure towards the programs to be diligently documented;
- c) In case at least 2% of average net profit of the three preceding years is not spent in a financial year, reasons for the same to be specified in the CSR report;
- d) Any surplus generated out of the CSR activities shall not to be added to the normal business profits of MHPL.

Treatment of excess amount spent

Any amount spends in excess of requirement provided under sub-section (5) of section 135, such excess amount may be set off against the requirement up to immediate succeeding three financial years subject to the conditions laid down in Rule-7 of the Companies (Corporate Social Responsibility Policy) Rules, 2014.

Funding, Selection and Monitoring Process

MHPL will receive requests for funding of projects throughout the year. The members of the committee along with Human Resources will evaluate proposals received, the focus areas and projects will be prioritized by assessing their impact. MHPL will then forward its recommendations to the Board. The CSR Committee will deliberate on the proposals and approve the proposals for implementation at its discretion. MHPL representatives will collaborate with stakeholders to monitor the status of each project and will report its findings to the CSR Committee periodically and an Annual Report to the Board of Directors.

Effective Date

This policy is effective from 30th September, 2022.