



# **CORPORATE SOCIAL RESPONSIBILITY POLICY**

## **(CSR POLICY)**

### **NAGA LIMITED**

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## **I. PREAMBLE**

Corporate Social Responsibility (CSR) is defined as the integration of business operations and values, whereby the interests of all stakeholders including investors, customers, employees, the community and the environment are reflected in the company's policies and actions.

This policy encompasses the company's philosophy for giving back to society as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for the welfare & sustainable development of the community at large. This policy is rooted in the Company's core values of quality, reliability and trust guided by the best practices and is driven by our aspiration for excellence in the overall performance of our business.

## **II. INTRODUCTION**

Corporate Social Responsibility is strongly connected with the principles of sustainability; an organization should make decisions based not only on financial factors, but also on the social and environmental consequences. Therefore, it is the core corporate responsibility of Naga Limited to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders and with intent to make a positive difference to society. Our CSR initiatives would focus on to create social, environmental and economic value to the society.

A CSR policy is framed to guide its strategic planning and provide a roadmap for its CSR initiatives, which is an integral part of overall business policy and aligned with its business goals.

## **III. OBJECTIVE**

The objective of our CSR policy is driven by the intent to make a material, visible and lasting difference to the lives of disadvantaged sections of society and a sustained positive contribution to the welfare of society at large. In the conduct of its CSR intervention, Naga Limited aims to act as a good corporate citizen and a socially responsible entity, identify the gaps and extend need-based contribution for the betterment of the society, contribute for the sustainable and holistic development of the underserved communities through various programs having multi-dimensional impact and generate community goodwill by making proactive interventions.

The policy applies to all CSR initiatives and activities to be undertaken by Naga Limited at various locations, within India, for the benefit of targeted segments of the society.

## **IV. SCOPE**

The policy would pertain to all activities undertaken by Naga Limited towards fulfilling its Corporate Social Responsibility objectives. The policy would also ensure compliance with section 135 of the Companies Act, 2013 and would include the activities as covered under Schedule VII to the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 and as amended from time to time.

## **V. CSR COMMITTEE**

The Committee / Board, as mandated under Section 135 (3) of the Companies Act, 2013,

- (a) formulates and recommends to the Board, as the case may be, a Corporate Social Responsibility Policy which indicates the activities to be undertaken by Naga Limited as specified in Schedule VII;
- (b) recommends the amount of expenditure to be incurred on the activities referred to in Section (a); and
- (c) monitors the Corporate Social Responsibility Policy of Naga Limited from time to time.

## **VI. GOVERNANCE STRUCTURE**

The Corporate Social Responsibility Committee (CSR Committee) / Board is the governing body that will articulate the scope of CSR activities for Naga Limited and ensure compliance with the CSR Policy. Board of Directors of Naga Limited may constitute / re-constitute / dissolve the CSR Committee in accordance with the provisions of the Act with respect to its composition and terms of reference.

## **VII. CORE FOCUS AREAS**

Naga Limited has adopted the following core focus areas for its CSR initiatives:

1. 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 the promotion of sanitation and making available safe drinking water.
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
3. 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
4. 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
5. 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.
6. Measures for the benefit of armed forces veterans, war widows and their dependents; Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
7. Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports

8. Contribution to the prime minister's national relief fund 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

9. (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).

10. Rural development projects

11. 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.

12. disaster management, including relief, rehabilitation and reconstruction activities.

## **VIII. SOURCE OF FUND**

Naga Limited allocate two per cent of the average net profits ("average net profit" shall be calculated in accordance with the provisions of section 198 of Companies Act 2013) of the company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.

## **IX. IMPLEMENTATION**

Each project may be executed in any of the following modes:

1. Undertaking CSR activities by Naga Limited itself
2. Section 8 company/ registered public trust / registered society, registered under section 12A and 80 G of the Income Tax Act, 1961, established by the company, either singly or along with any other companySpecialized agencies, such as NGOs, Trusts, Self-Help Groups
3. Section 8 company/ registered trust/ registered society, established by the Central Government or State GovernmentGovt. / Semi- Govt. / Autonomous Organizations,
4. any entity established under an Act of Parliament or a State legislature Educational Institutions,
5. Section 8 company/ registered public trust/ 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 activitiesProfessional Consultancy Organizations,

The CSR Committee of the Board/Board, as the case may be, shall meet annually to review project progress and revise the CSR policy as needed. Additional meetings may be called for by any member of the committee / Board, if required.

#### **X. ENLISTING OF ACTIVITIES WHICH SHALL NOT BE CONSIDERED AS CSR**

According to Rule 2(1)(d) "Corporate Social Responsibility (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 provisions contained in these rules, but shall not include the following, namely:-

- i. activities undertaken in pursuance of normal course of business of the company: Provided that any company engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that
    - a. such research and development activities shall be carried out in collaboration with any of the institutes or organisations mentioned in item (ix) of Schedule VII to the Act;
    - b. details of such activity shall be disclosed separately in the Annual report on CSR included in the Board's Report;
  - ii. any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
  - iii. contribution of any amount directly or indirectly to any political party under section 182 of the Act;
  - iv. activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
  - v. activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
  - vi. activities carried out for fulfilment of any other statutory obligations under any law in force in India;
- Further, the Naga Limited shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility activities. This provision has to be followed in letter and spirit.

#### **XI. AMENDMENT**

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines as may be issued by Government, from time to time. The Board will review the policy from time to time based on changing needs and aspirations of the target beneficiaries and make suitable modifications, as may be necessary.

#### **XII. CONCLUSION**

The above guidelines would form the framework around which the CSR activities would be undertaken. Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

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This policy was amended and reviewed by the Board of Directors in their meeting held on 26.05.2023