

POLICY FOR CORPORATE SOCIAL RESPONSIBILITY

(last amended on 9th February, 2024)

I. **SHORT TITLE:** This policy in relation to the Corporate Social Responsibility ("CSR") of NJ India Invest Private Limited is titled as the "CSR Policy" and shall include any alterations, amendments or modifications thereto from time to time.

II. VISION STATEMENT, OBJECTIVE AND APPLICABILITY

1. The CSR Policy sets out our commitment to ensuring that our activities extend beyond business and include initiatives and endeavours for the benefit and development of the community and society. The CSR Policy lays down the guidelines for undertaking programmes geared towards social welfare activities or initiatives.
2. This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act, 2013 ("Act") and the rules issued thereunder.

III. DEFINITION AND INTERPRETATION

1. "**Board**" means the Board of Directors of the Company.
2. "**Company**" means NJ India Invest Private Limited.
3. "**CSR Activities**" means the activities undertaken by the Company in pursuance to its statutory obligation laid down in section 135 of the Companies Act, 2013 and such programs and projects as may be approved by the Board in terms of this CSR Policy.
4. "**CSR Committee**" means a committee constituted by the Board of Directors in terms of Section 135 of the Act and the CSR Rules.

5. "**CSR Rules**" means the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.
6. "**CSR Expenditure**" means the amount recommended by the CSR Committee to be incurred on the CSR Activities in India in terms of the Act and the CSR Rules as approved by the Board from time to time.
7. "**Director**" means a member of the Board of the Company.
8. "**Implementing Agency**" means an implementing agency as defined under paragraph IV(2).
9. "**Society**" means a society registered under the Societies Registration Act, 1860 or any other applicable law in India.
10. "**Trust**" means a public charitable trust registered under the Indian Trusts Act, 1882 or any other applicable law in India.

Any term not defined above, shall have the meaning assigned to it under the Act or the CSR Rules.

IV. IDENTIFICATION:

Identification of Projects/ Programmes:

The CSR projects shall be identified either as an ongoing project or other than ongoing project. An 'ongoing project' means a multi-year project having such timeline as is prescribed under the applicable provisions of the Companies Act, 2013 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 CSR Committee/ Board based on reasonable justification.

Every other project shall be identified as 'other than ongoing project'.

Identification of Activities:

Focus area and activities are identified by the Corporate Social Responsibility Committee/ Board of Directors in consultation with eminent citizens, representatives of voluntary organizations, local representatives, local administration, persons of the area where the activity is to be undertaken and other socially active persons/ entities. Subsequent to this, the activities are prioritized and a plan of action is chalked out and worked upon. After the work is accomplished, its outcome is assessed to evaluate the difference between the desired and achieved results, if any, and to take corrective steps in case of deviations to ensure that the desired results are achieved.

V. IMPLEMENTATION OF THE CSR POLICY

1. The Board shall be responsible for implementing the mandate of the CSR Policy and shall ensure that the CSR Activities are carried out in accordance with the CSR Policy read with the Act and CSR Rules and the annual action plan formulated and recommended by the CSR Committee.

2. Mode of Implementation: The CSR Activities may be undertaken by the Company directly or through any of the following entities as "**Implementing Agency**" being duly registered with the Central Government having issued a unique CSR Registration Number (with effect from 1 April 2021):
 - (i) A Company established under section 8 of Companies Act 2013 or any other previous Acts, or a registered public trust, or a registered society exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 registered under section 12A and 80G of the Income Tax Act 1961, established by the company, either singly or along with any other company;

(ii) A Company established under section 8 of Companies Act 2013 or any other previous Acts, or a registered trust, or a registered society, established by Central Government or State Government;

(iii) A Company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

(iv) Any entity established under an act of Parliament or a State Legislature

3. The Company shall conduct due diligence prior to selection of an entity as its implementation agency, to *inter alia* verify the credentials and ensure that the proposed implementation agency is eligible and capable to be appointed as such.

4. The Company may collaborate with the group companies/ affiliates in consultation with the CSR Committee, to identify, conduct due diligence and contribute to CSR Projects. As part of such collaboration, any one of the NJ India Invest Private Limited collaborating Group Companies/ affiliates may engage with implementation agencies (including execution of the appropriate memorandum of understanding or any other documents as approved by the CSR Committee) on behalf of the Company.

The Company may also collaborate with other companies for undertaking projects or programmes or CSR Activities in such a manner that the CSR Committees of respective Companies are in a position to report separately on such projects or programmes in accordance with these rules.

5. The Board shall empower the CSR Committee to finalize, approve and execute various agreements, deeds, writings, confirmations, undertakings or other documents, as may be necessary with any party including Implementing Agencies and/or others for the purposes of the CSR Policy and accept modifications, changes and amendments to any

such documents/ agreements as it may deem fit.

6. In case of failure to ensure the minimum CSR Expenditure i.e. 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years, detailed reasons for the same should be submitted by the CSR Committee to the Board. Further the Board shall duly include such explanation in their annual board of directors' report. And, unless the unspent amount relates to any ongoing project referred to in sub-section (6) of Section 135 of the Companies Act, 2013, transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year

V. CSR COMMITTEE

1. The CSR Committee shall be as per Annexure A.
2. The CSR Committee shall be responsible for providing recommendations to the Board with respect to CSR Activities that may be undertaken by the Company in accordance with the CSR Policy as well as the Act and the CSR Rules.
3. Without prejudice to the generality of the foregoing, the CSR Committee shall be responsible for the following activities:
 - (i) Formulating and recommending CSR Activities/ programs to the Board;
 - (ii) Recommend amount of CSR expenditure to the Board;
 - (iii) Monitor the implementation of the CSR Policy of the Company; and
 - (iv) Formulate and recommend to the Board, an Annual Action Plan in pursuance of the CSR Policy in accordance with the applicable law, and inclusive of the following items:
 - (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;
 - (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