

Corporate Social Responsibility Policy

Preamble:

Nhava Sheva International Container Terminal Pvt. Ltd (NSICT) is committed to being a good corporate citizen, working in a sustainable and responsible way. This is essential to building a strong business for its people, the environment, customers, and the communities within which it operates. Over the years, the Company has strived to serve the communities through various initiatives.

This policy outlines our Corporate Social Responsibility agenda and key priorities and focus areas of the Company.

Thrust Areas:

The Company shall undertake such CSR Activities, as mentioned in Schedule VII of the Companies Act, 2013 read with rules made thereunder, as amended from time to time. The major Thrust Areas shall be: -

- Education
- Healthcare
- Wildlife Protection
- Ocean Protection and
- Emergency Relief

Guiding Principles:

NSICT's CSR Policy is supported by the following principles:

- The Company shall not discriminate against the beneficiaries of the CSR Activities, on any grounds whatsoever, including race, gender, age, ethnicity, caste, religion, domicile, but may focus its CSR Activities to benefit the economically or socially weaker, or marginalised sections, of the society;
- The Company shall endeavour utmost transparency in selection, implementation, monitoring and reporting of CSR Activities;
- The Company shall ensure that the CSR Activities are implemented in accordance with the Annual Action Plan, approved by the Board.

Governance Mechanism:

Company follows structured governance procedures to monitor CSR activities. Our CSR Policy is governed by the Board of Directors of the Company ("Board").

The Board shall monitor the CSR Policy, activities / programs, and the amounts spent on such activities / programs.

The Board shall formulate an annual action plan in pursuance of its CSR policy, which shall include the following, namely:

- a. the list of CSR projects or programmes and the manner of execution;
- b. the modalities of utilisation of funds and implementation schedules;
- c. monitoring and reporting mechanism; and
- d. details of need and impact assessment, if any, for the projects undertaken by the company.

The Board may alter such plan at any time during the financial year based on the reasonable justification to that effect.

The Board shall ensure that the CSR activities are undertaken by the Company itself or through a company/entity in accordance with the Companies Act, 2013 as amended from time to time.

The Board shall satisfy itself that the funds disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

In case of 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 modifications, if any, for smooth implementation of the project within the overall permissible time period.

The Board shall ensure that the administrative overheads shall not exceed 5 (five) percent of total CSR expenditure of the company for the financial year. The Board shall also ensure that surplus, if any arising from CSR programs and/or any amount unspent on the CSR activities shall be dealt in accordance with the provisions of the Companies Act, 2013.

Funding, Selection and Monitoring of CSR Projects:

The Board may receive requests for funding of projects throughout the financial year. It shall deliberate on the proposals and approve proposals for implementation at its discretion. It has devised a “transparent funding / selection / monitoring mechanism” for various CSR Projects / Programs / Activities undertaken by the Company including conduct of impact studies, where it deems necessary, of CSR Projects / Programs, through independent third-party agencies or internal resources. Management shall monitor the status of each project and will report its findings to the Board periodically. Simultaneously, Management also obtains feedback from various beneficiaries of CSR Projects / Activities / Programmes undertaken by the Company to measure their benefits.

Disclosures:

Details of the CSR policy and details of CSR Activities approved by the Board shall be available on the Company’s website.

Annual report on CSR Activities shall be included in the Board’s Report forming part of Company’s Annual Report.

Limitation and Amendment:

The Board of Directors may in their discretion make any changes/modifications and/or amendments to this Policy from time to time for making suitable amendments for better implementation of the Policy. In the event of any conflict between the provisions of this Policy and statutory requirements, law shall prevail over and automatically be applicable to this Policy.

Controlled by	Approved by	Revision no.	Approval / revision date
HR Department	Board of Directors	--	21.01.2015
Sustainability & Impact Team	Board of Directors	1	13.12.2021