

**CORPORATE SOCIAL RESPONSIBILITY POLICY**

**1. INTRODUCTION**

India is one of the fastest and largest growing economies in the world. With the growing development, India is also flooded with various social problems such as poverty, unemployment, illiteracy, power crisis, gender bias, and many more. To sustain economic growth and to overcome the effects of development and globalization, it becomes necessary for every citizen whether individual or corporate to take the responsibility of the people, society, environment and its resources in which we reside. The essence of CSR is to integrate economic, environmental and social objectives with the company's operations and growth.

Here emerged the need of Corporate Social Responsibility. Although the concept of Corporate Social Responsibility is not new in India, however, the Ministry of Corporate Affairs, Government of India notified the Section 135 of the Companies Act, 2013 which makes it mandatory for certain companies who fulfill the criteria as mentioned under sub-section (1) of Section 135 to comply with the provisions relevant to Corporate Social Responsibility.

The concept of CSR rests on the ideology of give and take. Companies take resources in the form of raw materials, human resources etc. from the society. By performing the task of CSR activities, the companies are giving something back to the society.

Uma Converter Limited (hereinafter to be referred as the "**Company**") understands its responsibility towards the society and environment in which it operates, and is committed to operate and grow its business in a socially responsible way. The company has revised its CSR policy and it will be applicable with effect from **April 20, 2021**.

**2. APPLICABILITY**

The CSR Policy shall apply to all CSR projects undertaken by the Company in India as per Schedule VII of the Act. The CSR Policy shall be applicable to the Company and all their employees.

**3. DEFINITIONS**

- (a) "**Act**" means Companies Act, 2013 including any Statutory modification or re- enactment thereof;
- (b) "**Board**" means Board of Directors of the Uma Converter Limited.
- (c) "**Corporate Social Responsibility**" generally means and includes but it is not limited to: Projects or programs relating to activities specified in Schedule VII of the Act; or Projects or programs relating to activities undertaken by the Board in pursuance of recommendations made by the CSR Committee as per CSR policy of the Company subject to the condition that such policy includes the subject covered under Schedule VII of the Act.
- (d) "**CSR Committee**" means Corporate Social Responsibility Committee of the Board.
- (e) "**CSR Policy**" refers to activities to be undertaken by the Company as determined by the CSR Committee and approved by the Board of Directors from such projects or programmes relating to activities specified in Schedule VII or covered as Corporate Social Responsibility as per this policy and the expenditure thereon, excluding activities undertaken in pursuance to normal course of business of the Company.
- (f) "**Employee**" means every employee of the Company (whether working in India or abroad).

**4. CSR COMMITTEE**

The Board of Directors of the Company has constituted Corporate Social Responsibility Committee ("**CSR Committee**") in accordance with the provisions of Companies Act, 2013 comprising of following Three Directors (One is Independent Director) of the Company.

**Mr. Ashok Kavdia (Independent Director) – Chairman**

**Mr. Sumer Raj Lodha (Managing Director) – Member**

**Mrs. Nirmala Lodha (Director) – Member**

The Board of Directors may change the composition of the CSR Committee from time to time in such manner as it thinks fit.

**5. FUNCTIONS AND RESPONSIBILITY OF CSR COMMITTEE**

The CSR Committee of the Company is responsible for:

- (a) Formulating and recommending to the Board the CSR policy which shall indicate activities to be undertaken in line with Section 135 read with Schedule VII of the Act.
- (b) Identifying and Recommending to the Board the CSR projects/activities to be undertaken by the Company.
- (c) Recommending to the Board the CSR expenditure to be incurred.
- (d) Recommending to the Board, modifications to the CSR policy as and when required.
- (e) Regularly monitoring the implementation of the CSR policy and reporting to the Board.
- (f) To ensure compliance of CSR policy and the Rules;
- (g) Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors, from time to time.

**6. CSR ACTIVITIES**

- (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 the promotion of sanitation and making available safe drinking water;
- (ii) Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) Promoting gender equality and 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' set-up by the Central Government for rejuvenation of river Ganga
- (v) Protection of national heritage, art and culture including restoration of building and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts
- (vi) Measures for the benefit of armed forces veterans, war widows and their dependents
- (vii) Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports
- (viii) 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
- (ix) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- (x) Rural development projects
- (xi) Slum area development.

**7. MODE OF CARRYING CSR ACTIVITIES**

The Board shall ensure that the CSR activities are undertaken by the Company itself or through-

- (a) 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 along with any other company;
- (b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government;
- (c) any entity established under an Act of Parliament or a State legislature; 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,

**8. PROCEDURE FOR CSR ACTIVITIES**

- (a) The Committee shall identify and recommend to the Board suitable CSR activities to be undertaken during the financial year along with the proper planning for the particular project / activity
- (b) The Board shall give its approval based on the recommendation of the Committee with respect to compliance of this Policy
- (c) The Board of Directors shall monitor the implementation of the CSR activities
- (d) The Committee shall place a progress report on half yearly/annual basis
- (e) The Board shall review the same and suggest recommendation, if any

**9. CSR BUDGET**

The CSR Committee will abide by the provisions relating to annual expenditure on CSR activities as laid down in Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.

**10. MONITORING PROCESS**

CSR Committee shall monitor the implementation of various programs, projects and activities in such manner as it deems fit. CSR Committee shall also determine the manner of submission of information, reports, files, etc. by third parties as a part of the monitoring process. CSR Committee shall ensure that a transparent monitoring mechanism is put in place.

**11. DISCLOSURES**

The Board's Report of the Company covered under these rules pertaining to any financial year shall include an annual report on CSR containing particulars specified in the CSR Regulations, as applicable to the Company. The above information shall also be displayed on the Company's website.

**12. AMENDMENT**

The Company or the Board reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification shall be inconsistent with the applicable provisions of the Act or any law for the time being in force.

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