

Corporate Social Responsibility Policy

Philosophy

For us in the Neterwala Group (NG) and Uni Abex Alloy Products Limited (UAL), reaching out to underserved communities is part of our DNA. We believe in the trusteeship concept and building economic, social and environmental capital towards enhancing societal sustainability. This entails transcending business interests and grappling with the "quality of life" challenges that have-nots communities face, and working towards making a meaningful difference to them.

Our vision is – "to actively contribute to the social and economic development of the communities in which we operate. In so doing build a better, sustainable way of life for the weaker sections of society.

As a responsible corporate group we would like to make positive contribution towards betterment of society in areas and communities in which it operates. The Company's progress and prosperity is linked to the social conscience of the populace which, in turn, is dependent upon the economic and educational development of all stakeholders cutting across strata and irrespective of caste creed or religion. The aim of the CSR Policy is to augment and foster the social conscience and to contribute positively to social and economic development at large and to jointly work towards making a meaningful difference to the society. We believe in enhancing environmental and natural capital; supporting rural development; promoting education; providing preventive healthcare, providing sanitation and drinking water; creating livelihoods for people, especially those from disadvantaged sections of society, preserving and promoting sports;

Recognizing that business enterprises are economic organs of society and draw on societal resources, it is UAL's belief that a Company's performance extends beyond its Bottom Line contribution to contributing to economic, social and environmental capital for enhancing social sustainability.

Being conscious that there is always scope for improvement the Board of Directors has constituted the Corporate Social Responsibility Committee ('CSRC') and formulated this Corporate Social Responsibility Policy ('CSR Policy') to be implemented and monitored by the CSRC under overall supervision of the Board of Directors ('Board') of the Company.



A Neterwala Group Company

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ISO 9001:2008

CSR Objectives

The objectives of the CSR Policy are to:-

1. Enhancing environmental and natural capital;
2. Supporting rural development;
3. Promoting education;
4. Improving healthcare and health consciousness;
5. Creating livelihoods for people, especially those from disadvantaged sections of society, in rural and urban India;
6. Developing the required capability and self-reliance of beneficiaries at the grass roots, especially of women;
7. To engage in skill building and vocational training particularly in less advantaged sections of society;

primarily in areas that fall within the economic vicinity of the Company's operations to enable close supervision and ensure maximum development impact.

Governance

1. The CSRC will prepare the annual CSR Plan and budget for approval of the Board subject to such modifications as the Board may consider appropriate.
2. The CSRC will have ownership of implementation of the CSR Plan as approved by the Board and will identify persons (including external implementing agencies or institutions) who may usefully partner in the implementation of the annual Plan. Where any partner is involved the CSRC will monitor such partner's performance.
3. Once in each quarter the CSRC will report to the Board on the progress of execution of the Annual Plan.
4. At the end of every financial year the CSRC will submit its annual report to the Board.
5. The Board shall have power to issue appropriate directions to the CSRC from time to time.

CSR Budget & Expenditure

1. CSR expenditure will include all expenditure, direct and indirect, incurred by the Company in accordance with the Annual Plan. Any surplus arising from any activity within the Annual Plan shall be used for CSR. A specific budget is allocated for CSR activities. This budget is project driven.
2. The Board shall budget for CSR expenses in accordance with the Annual Plan proposed by the CSRC and approved by the Board each financial year. The annual expenditure on CSR shall not be less than the statutory minimum from time to time prescribed.
3. Contribution of any amount directly or indirectly to any political party shall not be included in the CSR budget.
4. Any expenditure incurred for building CSR capacity, whether own or that of any implementing agency shall not exceed five (5) percent (%) of total CSR expenditure, in one particular financial year.



Composition of CSRC

The CSRC shall comprise of three (3) directors of whom at least one (1) will be an Independent Director.

Procedure

1. The CSRC shall have power to regulate its own procedure.
2. However, the CSRC shall comply with all directions as may be issued by the Board.
3. The CSRC shall maintain minutes of meetings.
4. The Board shall make available to the CSRC such manpower and office infrastructure as the CSRC may reasonably require.

Management Commitment

The Board of Directors and the Management and all of our employees have the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterised by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

Review of CSR Policy

The Board shall have power from time to time to review and amend the CSR Policy as the Board may consider appropriate.

