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# CORPORATE SOCIAL RESPONSIBILITY POLICY

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## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

### **PREAMBLE:-**

NOVERA EXIM believes that organizations, similar to individuals, depend for their survival, sustenance and growth on the support and goodwill of the communities of which they are an integral part, and must pay back this generosity in all the possible ways.

The Company believes that the true and full measure of growth, success and progress lies beyond financials or conventional economic indices. It is best reflected in the difference that business and industry make to the lives of people.

### **OBJECTIVE:-**

VVT' CSR Policy intends to:

- ✓ Strive for economic development that positively impacts society at large with minimal resource footprint.
- ✓ Embrace responsibility for the firm actions and encourage a positive impact through its activities to alleviate hunger, poverty and malnutrition; to protect the environment; and to support communities, stakeholders and society.

### **DEFINITIONS:-**

**“Company”** means NOVERA EXIM.

**“Act”** means The Companies Act, 2013 and includes Companies (Corporate Social Responsibility Policy) Rules, 2014 and all other applicable rules and any statutory modifications, re-enactment thereof.

**“Board”** means the Partners of the Firm”

**“Corporate Social Responsibility”** means and includes but is not limited to-

- (i) Projects or programs relating to activities specified in the Act; or
- (ii) Projects or programs relating to activities undertaken by the Board in pursuance of the recommendations of the CSR Committee, as per the declared CSR policy of the Companies.

**“CSR Committee”** means the Corporate Social Responsibility committee constituted under section 135(1) of the Act.

“**Net Profit/Profit**” refers to the average net profits of the Company, calculated in the manner as provided under the Act.

**APPLICABILITY:-**

As per Section 135(1), of the Act, CSR is mandated if the Company fulfills any of the below criteria in a financial year, then the Company need to comply with Section 135 and the Rules made there under.

- ✓ Companies having net worth of Rs. 500 crores or more or
- ✓ Companies having turnover of Rs. 1000 crores or more or
- ✓ Companies having a Net profit of Rs. 5 crores or more

However, if for three consecutive financial years it ceases to comply with the criteria, then the Company shall not:

- ✓ Constitute a CSR Committee
- ✓ Comply with the provisions of Section 135 (2) to (5) until it meets the aforesaid criteria again

**VISION STATEMENT:-**

In alignment with vision of the Company, through its CSR initiatives the Company, will enhance value creation in the society and in the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth in the society and community around it along with environmental concern. The objective of this policy is to operate its business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders and other objects of the Company.

Further, take up those programmes directly or indirectly, that benefit the communities and society at large, over a period of time, in enhancing the quality of life & economic well-being of the local populace.

**MODE OF IMPLEMENTATION**

SR. NO.	FOCUS AREA	IMPLEMENTATION STRETAGY
1.	Hunger, poverty, malnutrition and healthcare	Work directly or with non-profit organizations at infrastructure and/or operational level to support meal or nutrition related programs in schools and other institutions across India. Work with medical and health related

		organizations for projects in preventive healthcare, short term and long-term care and treatments.
2.	Education	Partner directly or with non-profit organizations, primary, secondary and higher educational institutions including schools, colleges, and universities to encourage efforts in a wide range of areas including training, provision of funding for continued education, skilling and re-skilling initiatives, offline and online education, research, infrastructure development and capacity building
3.	Gender equality and empowerment of women	Work directly or with NGOs to reach out to underprivileged and socially disadvantaged persons including women and children towards the cause of gender equality and empowerment. Projects include awareness activities, trainings, support for livelihood related efforts, infrastructure development, and operational needs.

**NOVER EXIM’s corporate social responsibility commitments are built around four critical areas:**

- ✓ **Employees & People** – We take seriously our responsibilities to protect, support, and prepare workers for successful careers, and to advocate on their behalf. Our efforts are focused on providing career opportunities and resources to the global workforce, and leading by example in areas such as workplace safety, health and wellness, diversity and inclusion, and training and development. We believe in opportunity for all and are steadfast in our commitment to equal employment opportunity, the protection of human rights, and the prevention of human trafficking.

- ✓ **Ethics** – NOVERA EXIM is committed to doing the right thing, conducting ourselves in a legal, ethical, and trustworthy manner, upholding our regulatory obligations, and complying with both the letter and spirit of our business policies.
- ✓ **Engagement** – NOVERA EXIM understands that it takes all of us working together to truly have an impact. As such, we partner with organizations in the communities where we live and work to improve lives and society as a whole – by engaging in activities such as community service, philanthropy, and support for small, minority, women, and disadvantaged businesses. We also seek to engage with workforce suppliers who operate using socially responsible business practices and adhere to the professional
- ✓ **Environment** – NOVERA EXIM recognizes a shared responsibility to protect our planet. Although our facilities and operations have a small ecological footprint, we reduce the environmental impact of our business through preservation, conservation, and waste reduction practices.

(Authorized Signatory)