



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY OF NSDL DATABASE MANAGEMENT LIMITED (NDML)

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1) Introduction

CSR as a process is initiated with the aim to embrace responsibility for the company's actions and encourage a positive impact through its activities on the environment, consumers, communities, stakeholders and all other members of the public sphere who may also be considered as stakeholders. CSR policy functions as a guiding principle whereby CSR objectives and goals are well defined with specific mention of verticals where planned activities can be carried out in a project mode. The implementation plans are worked out with processes for built-in for monitoring and evaluation of the activities to ensure active compliance and governance with the spirit of the law, ethical standards, and prescribed norms.

The Corporate Social Responsibility Committee shall be constituted in accordance with Section 135 of Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.

The role of the Committee is to:

- (a) Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the verticals of activities to be undertaken by the company as specified in Schedule VII of the Companies Act 2013 (the Act);
- (b) Recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the list of CSR projects or programs that are approved to be undertaken, the manner of execution of such projects or programs, the modalities of utilization of funds and implementation schedules for the projects or programs, monitoring and reporting mechanism for the projects or programs and details of need and impact assessment (if any) for the projects undertaken by the Company;
- (c) Recommend the amount of expenditure to be incurred on the activities;
- (d) Monitor the progress of the CSR activities of the company from time to time;
- (e) Recommend to the Board, an alteration in annual action plan of projects or programs, if any, in pursuance of the CSR policy;

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- (f) Any other matter as may be considered expedient in furtherance of and to comply with Corporate Social Responsibility Policy.

2) Philosophy of NDML

The Company believes in providing efficient and cost effective services to the users of the system and it endeavors to make a positive impact not only on the lives of its employees and immediate stakeholders but also over the marginalised and disadvantaged section of the society to the extent feasible. It aims to work towards contributing in the building an equitable and inclusive society where all the members are provided opportunity for economic and social growth and development.

3) CSR Guiding Principles

The CSR initiatives will be undertaken by taking into consideration the critical national, state level and community level gaps/needs in areas of focus. Here, the community is taken as geographical location surrounding the primarily, where NDML and its holding company NSDL has direct reach to monitor the implementation.

It will be directed towards the underprivileged and marginalised sections of the community and thereby enabling socio-economic development. The activities will be undertaken in a project mode with processes in place for regular periodic monitoring, measuring the deliverables and ensuring long term impact and sustainability of the initiatives.

4) Areas for activities

The theme of the CSR activities are in pursuance of the activities listed in Schedule VII of Section 135 of Companies Act, 2013 and any amendment introduced in due course. The Company shall undertake its CSR programs/projects/activities as per the list of items enumerated in Schedule VII as below:

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- Promoting education, including special education and employment enhancing vocation skills and livelihood enhancement projects.
- Promoting health care including preventive health care, hygiene and sanitation aspects.
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water.
- Contribution to the national relief funds including PM CARES Fund/ Prime Minister's National Relief Fund during any sort of national distress situation or emergency situation or natural calamities, which is permissible as CSR expenditure.
- Rural development projects.
- Disaster management, including relief, rehabilitation and reconstruction activities.

Further, NDML shall endeavor to align the CSR activities with the activities of NSDL in order to avoid duplication of efforts, optimal utilization of resources and administrative convenience.

The activities specified are aligned with the Schedule VII of the Companies Act, 2013 and CSR Rules, Notifications, Circulars issued thereunder.

5) Implementation and project planning

- The implementation of the CSR activities will be done either by the Company itself or through implementing agencies whichever is feasible. The CSR programs/ projects shall be managed and administered by in-house CSR team.
- In case the program implementation is facilitated through implementing agencies, the Company will ensure the necessary compliances as laid down by MCA. While implementing projects/programs through implementing agencies, the projects will be implemented in partnership with implementing partners (NGOs, civil society organisations, academic institutions, etc.) having expertise and required experience in the verticals selected for the activities.
- Endeavour shall be made giving employee's voluntary participation in the CSR activities.

- In-house CSR team shall be responsible for the implementation and monitoring of the activities and utilization of funds allotted.

6) Monitoring

Monitoring of the project will be done through site visits by the Company CSR representative, quarterly progress reports along with Financial Utilization certificate provided by the implementing partners. Annual review of project will be conducted following which project renewal will be sanctioned.

The status of implementation of the projects undertaken under the mantle of CSR shall be placed before the CSR Committee.

7) Reporting

The Company will report the CSR spent and project status in the format specified in the Companies Act 2013 and CSR Rules 2014 and shall make necessary disclosure in the Annual Reports.

8) Contact Information

All enquiries on CSR activities shall be made to below mentioned correspondence.

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