

UNIVERSAL CONTRACTORS AND ENGINEERS LIMITED
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POLICY ON “CORPORATE SOCIAL RESPONSIBILITY (CSR)”



*This Policy has been adopted and approved by the Board of Directors at its meeting held
on 20th Sep 2024.*

CORPORATE SOCIAL RESPONSIBILITY POLICY

As a conscious corporate citizen, the organization believes that it has a social purpose. As a responsible business, Universal Contractors and Engineers Limited takes pride in being socially inclined and focuses on sustained and effective CSR projects. Our employees are encouraged to volunteer their time and skills and enjoy the experience of giving back to the communities in which their work.

UNIVERSAL CONTRACTORS AND ENGINEERS LIMITED allocates 2% of its Net Profit of the previous three Financial Years towards achieving its CSR objectives through implementation of meaningful & sustainable CSR programs. The same is in alignment with the provisions of Section 135 of the Companies Act, 2013.

OUR VISION:-

UCEL, through its CSR initiatives, will continue to 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 for the society and community, in fulfillment its role as a Socially Responsible Corporate, with Education and Healthcare and Environment concern.

OBJECTIVES OF CSR POLICY:-

- To ensure an increased commitment at all levels in the organization, to operate its business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders.
- To directly or indirectly take up programs that benefit the communities in & around its work centers and results, over a period of time, in enhancing the quality of life & economic well-being of the local populace.
- To generate, through its CSR initiatives, a community goodwill for UCEL and help reinforce a positive & socially responsible image of UCEL as a corporate entity.

APPLICABILITY:-

1. The CSR policy has been developed in consonance to Section 135 of the Companies Act 2013 (referred to as the Act in this policy) on CSR and in accordance with the CSR rules (hereby referred to as the Rules) notified by the Ministry of Corporate Affairs, Government of India in 2014.
2. The Policy shall apply to all CSR projects/programs undertaken by the Company in India as per Schedule VII of the Act.
3. This policy shall be applicable to Universal Contractors and Engineers Limited.

RESOURCES:-

For achieving its CSR objectives through implementation of meaningful and sustainable CSR programs, the company will allocate 2% of the average net profit of last three financial years as its annual CSR Budget.

Any unspent/unutilized CSR allocation of a particular year will be carried forward to the following year, i.e. the CSR budget will be non-lapsable in nature.

RESPONSIBILITY:-

The Board of Universal Contractors and Engineers Limited will be responsible for:-

- approving the CSR policy as formulated by the CSR Committee.
- ensuring that in each financial year the Company spends at least 2% of the average net profit before taxation excluding profits arising from overseas branches made during the three immediate preceding financial years.
- ensuring that every financial year funds committed by the Company for CSR activities are utilized effectively, and regularly monitoring implementation.
- disclosing in its Annual Report the names of CSR Committee members, the content of the CSR policy and ensure annual reporting of its CSR activities on the Company website www.ucepl.com.
- ensuring annual reporting of CSR policy to the Ministry of Corporate Affairs, Government of India, as per the prescribed format.

As per Section 135 the reasons for under spending of the allocated CSR budget shall be specified in the Board's Report. The surplus arising out of the CSR activities, if any, will not be considered as a part of the business profits of the company.

ORGANISATIONAL MECHANISM:-

As per the provisions of Section 135 of the Companies Act, 2013, for proper and periodic monitoring of CSR activities, companies have to constitute a CSR committee.

CONSTITUTION OF CORPORATE SOCIAL RESPONSIBILITIES COMMITTEE AS ON 20-09-2024:-

"Pursuant to the provisions of Section 135 of the Companies Act, 2013, a Corporate Social Responsibility (CSR) Committee of the Board of Directors of the Company be and is hereby constituted comprising of the following members of the Board of Directors of the Company as members of CSR Committee:

COMPOSITION OF CORPORATE SOCIAL RESPONSIBILITIES COMMITTEE:-

Name of the Director	Designation in the Committee	Nature of Directorship
Jalaj Parashar	Chairman	Independent Director
Pooja Sharma	Member	Non-Executive Director
Ashok Kumar Sharma	Member	Managing Director

SCOPE OF WORK OF A CSR COMMITTEE OF BOARD OF DIRECTORS:-

- Formulating the CSR policy in compliance to Section 135 of the Companies Act 2013
- Identifying activities to be undertaken as per Schedule VII of the Companies Act 2013
- Recommending to Board the CSR expenditure to be incurred.
- Recommending to Board, modifications to the CSR policy as and when required.
- Regularly monitoring the implementation of the CSR policy

GENERAL:-

- 1) All administrative expenses including expenditure on wages & salaries, tours and travels, training & development of personnel deputed on CSR activities would be borne from CSR funds.
- 2) If it is observed that any CSR activity taken up for implementation is found not properly implemented, CSR Committee at its discretion may discontinue funding the project at any time during the course of implementation.
- 3) On advice of CSR Committee selected Project may be taken up for evaluation through an outside Agency.
- 4) CSR Committee shall be empowered to amend or modify this policy and such changes shall be placed before the Board for approval.

MONITORING AND FEEDBACK:-

To ensure effective implementation of the CSR programs (if any) undertaken, a monitoring mechanism will be put in place by the CSR Committee. The progress of CSR programs under implementation will be reported on regular bases.

CSR initiatives of the Company will also be reported in the Report of Board of Directors of the Company.

AREA OF CSR ACTIVITIES: -

The Company will give priority to spent CSR amount in the local jurisdiction where the business of the Company is spread.

CSR THROUGH EXTERNAL AGENCY:-

While undertaking CSR programmes the CSR Committee can also identify the external agency who would execute the said programmes. In case of programmes execution by NGOs/Voluntary organizations/Trust the following minimum criterianeed to be ensured:

- The NGO / Agency has a permanent office / address in India
- The NGO is a registered society under Societies' Registration Act
- Possesses a valid Income-tax Exemption Certificate

The CSR Projects taken up through NGOs / Trusts shall be evaluated and monitored jointly by CSR committee and respective organizations. An evaluation format shall be prepared jointly by both CSR committee and Organization for this purpose.

Every claim/ instalment of NGOs/trusts for the work completed should be supported by proper bills and receipts / documents in support of the claim.
