

REGD. OFF.: RAKHIAL ROAD, RAKHIAL, AHMEDABAD-380 023, INDIA PHONE: 079-22911015 - 22911902 - 22910963

> Email: raghuvirad1@sanchamet.in Website: http://www.raghuvir.com CIN: L17119GJ1982PLC005424

CORPORATE SOCIAL RESPONSIBILITY POLICY

OF

RAGHUVIR SYNTHETICS LIMITED

(Approved and adopted in the Board Meeting dated 24th July, 2021)



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PREAMBLE:

The Company intends to make a positive difference to society and contribute its share towards the social cause of betterment of society and area in which companies operates. In line with the regulatory expectations, we are putting in place a formal policy as a guide towards our social commitment going forward.

This Corporate Social Responsibility Policy ("the CSR Policy") has been framed by RAGHUVIR SYNTHETICS LIMITED ("the Company") in accordance with the provisions of the Section 135 and Schedule VII of the Companies Act, 2013 ("the Act") and the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("the Rules"), including any statutory modification(s) or reenactment(s) thereof, issued by the Ministry of Corporate Affairs, Government of India.

POLICY OBJECTIVES:

The objective of the CSR Policy is to lay down the guiding principles in undertaking various programes and projects by or on behalf of the Company relating to the Corporate Social Responsibility ("the CSR") within the meaning of Section 135 read with Schedule VII of the Act and the Rules made thereunder.

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE AND ROLE OF THE BOARD OF DIRECTORS:

With reference to the provisions of the Section 135(9) of the Act, the Company is not required to constitute the CSR Committee under Section 135(1) as at present, the amount of CSR required to be spent by the Company under Section 135(5) does not exceed Rs.50,00,000/- (Rupees Fifty Lakhs) and the functions of such Committee shall be discharged by the Board of Directors of the Company.

However, when the amount required to be spent by the Company exceeds Rs.50,00,000/- or such other amount as may be amended, the Board of Directors shall constitute the requisite Corporate Social Responsibility Committee (CSR Committee) and do necessary compliance and make necessary amendment(s) in this Policy in this regard.

Meanwhile, in view of the above, the Board of Directors of the Company shall discharge the following functions of the CSR Committee as provided under Section 135(3) of the Act:

FOR RAGHUVIR SYNTHETICS LIMITED

DIRECTOR/AUTHORISED SIGNATOR



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- Formulate a CSR Policy which shall indicate the activities to be undertaken by the Company in areas or subject specified in the Schedule VII
- b) Determine/ approve the amount of expenditure to be incurred on the activities referred to in clause (a)
- c) Monitor the CSR Policy of the Company from time to time
- d) Review the CSR Report to be included in the Board's Report
- e) Review and make necessary amendment(s) in the CSR Policy of the Company, whenever required
- 1) To carry such other functions as may be required relating to CSR activities of the Company

CSR ACTIVITIES:

- 1) The Board shall ensure that the CSR Activities that are undertaken by the Company should be within the scope of the following activities specified in the Schedule VII of the Act:
 - (i) Eradicating hunger, poverty and mainutrition, promoting health care including preventinve health care and sanitation including contribution to the Swach 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 vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects
 - (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres 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, agroforestry, 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 buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts
 - (vi) measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows
 - (vii) training to promote rural sports, nationally recognised sports, paralympic sports

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and olympic sports

- (viii) contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women
- (ix) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government
- (x) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs)
- (xi) rural development projects
- (xii) slum area development
- (xiii) disaster management, including relief, rehabilitation and reconstruction activities
- 2) The CSR Activities will be carried out in a manner that the preference is to undertake the CSR Activities in and around the local areas where the Company operates.

IMPLEMENTATION OF THE CSR POLICY:

The Board shall be responsible for implementing the mandate of the CSR Policy and shall ensure that the CSR Activities are carried out in accordance with the CSR Policy read with the Act and CSR Rules and the annual action plan formulated by it.

Mode of Implementation: The CSR Activities may be undertaken by the Company with the prior approval of the Board, through any of the following entities as "Implementation Agency" being duly registered with the Central Government and having a unique CSR Registration Number:

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- 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, or
- 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; or
- 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.

The Company shall conduct due diligence prior to selection of an entity as its implementation agency, to *inter alia* verify the credentials and ensure that the proposed implementation agency is eligible and capable to be appointed as such.

The Company may engage international organizations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR Policy as well as for capacity building of their own personnel for CSR.

The Company may also collaborate with other companies for undertaking projects or programmes or CSR Activities in such a manner that the Board/ CSR Committee(s), as may be applicable, of respective companies are in a position to report separately on such projects or programmes in accordance with these rules.

CSR EXPENDITURES:

- 1) The Company shall spend at least 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years in accordance with the Act and the Rules and the CSR Policy.
- 2) The Board shall ensure the manner in which the CSR Expenditure shall be incurred in a year, in accordance with the Act and the Rules and the CSR Policy.
- 3) The Board shall be responsible for sanctioning the CSR Expenditure, and for taking steps to ensure that the amount for the CSR Expenditure is available for application towards the CSR Activities.

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- 4) Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company and may only be re-allocated to the CSR Activities being undertaken in terms of this CSR Policy and the annual action plan for the financial year in which such surplus has arisen.
- 5) In order to count towards CSR Expenditure, CSR Activities must be undertaken in compliance with the applicable laws.
- 6) The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR Expenditure of the Company for the financial year.

REPORTING AND RECORD KEEPING:

The Board shall maintain and keep the proper records relating to the CSR Activities and Projects. The Board's Report of the Company shall include an Annual Report on CSR containing the particulars set out in Annexures to the CSR Rules and such other details as may be prescribed, from time to time under the Act and the CSR Rules.

In respect of the reporting, the Board will be responsible to ensure that:

- (i) The report of the Board includes the Annual Report on CSR Activities of the Company and sets out the requisite information in terms of the Act and the Rules;
- (ii) The contents of the latest and updated version of the CSR Policy are included in the Report of the Board;
- (iii) The contents of the CSR Policy and projects approved by the Board are also made available on the website of the Company.
- (iv) In case of failure to ensure the minimum CSR Expenditure, detailed reasons for the same are adequately disclosed in the Board's Report.

AMENDMENT:

The Board of the Company may, subject to compliance with applicable law, at any time alter, amend or modify the CSR Policy as it deems fit to comply with the statutory obligation of the Company to undertake the CSR Activities.

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EFFECTIVE DATE:

This Policy is effective from the retrospective effect from 01.04.2021

Date: 24/07/2021 Place: Ahmedabad

BY ORDER OF THE BOARD OF RAGHUVIR SYNTHETICS LIMITED

FOR, RAGHUVIR SYNTHETICS LIMITED

DIRECTOR/AUTHORISED SIGNATOR)

SUNIL R. AGARWAL (CHAIRMAN & MANAGING DIRECTOR)