

CSR POLICY

Introduction

RPG Foundation, a trust established by RPG Group leads Company's social outreach programs. As a responsible business corporation, Company takes pride in being socially committed and focused on building sustainable and effective Corporate Social Responsibility (CSR) initiatives, as permitted under the Companies Act, 2013 and rules thereunder, as amended from time to time. Its areas of focus, *inter-alia*, include - **Community Development, Employability Enhancement, Environment Sustenance, Heritage and Digital Literacy**. The management has a strong belief in the merits of participation in CSR by the employees of Company and therefore, places much emphasis on employee volunteering for CSR activities. We choose to work in the neighborhood of Company locations, so as to engage in an interactive and harmonious relationship with the communities around.

Partnerships

RPG Foundation (RPGF) is an 'implementing organization' and is directly involved in the CSR projects being undertaken. Collaborative partnerships may be formed with both, Government & Non-Government Organizations (NGOs) and other like-minded stakeholders. This helps widen the Company's reach and leverages the collective expertise, wisdom and experience that these partnerships bring to the issues that Company is committed to.

Budget

Each year, the budget for CSR spends is in line with the provisions under the Companies Act, 2013 in this regard. The budget is project driven and approved by the Board of Directors. Any surplus arising out of CSR programs shall not form part of the business profit of Company and would be ploughed back to the CSR corpus for spending on CSR projects only.

Monitoring mechanism and responsibilities

All projects are conducted in line with the provisions of the Companies Act, 2013 and rules thereunder and are reviewed periodically against targets and approved budgets by the Board of Directors and wherever necessary, midcourse corrections are initiated.

Guiding Principles

Guiding Principles annexed herewith as Annexure I form integral part of this Policy and shall be adhered to, as per the applicable provisions of Companies Act, 2013 and Rules thereunder.

Annexure I

Guiding Principles

I. Guiding principle for selection of activities

The CSR Activities for the Company are primarily carried out by RPG Foundation (RPGF), Implementing Agency and following guiding principles for selection of CSR activities are followed: -

- **Activity:** CSR activities permitted in Schedule VII of the Companies Act, 2013 as may be amended from time to time, only should be undertaken in close coordination with RPGF and the Board of Directors.
- **Location:** Preference should be given to the local areas in India where the Company operates, to the extent reasonably possible.
- **Benefits:** Priority should be given to projects which will bring long term, sustainable and lasting benefits to the community. Company shall endeavour to select projects that are long term in nature and have a lasting impact on the beneficiaries even upon disengagement at the end of the project period.
- **Budget allocation:** Company shall spend, minimum two percent (2%) of the average net profits made during the three immediately preceding financial years, for CSR activities. The spend on any identified activity may be decided on the need assessment either undertaken by the Company or RPGF.

II. Guiding principle for implementation and monitoring of activities

- Once the CSR projects or programs are identified and finalized, RPGF should make a schedule for implementation along with milestone thereof. Unless it is an Ongoing project, the entire CSR activities should be fully implemented before the close of the financial year.

- For Ongoing project, year wise budget would be allocated and milestones of completion should be defined and adhered to.
- As far as possible every effort should be made to ensure that approved CSR activities are implemented in line with the implementation schedule(s) shared with the Board of Directors which forms part of the Annual Action Plan.
- For monitoring, RPGF which is implementing the projects or programs shall place reports/update(s) before the Board of Directors meeting.
- Company shall review its average CSR obligation to ascertain the applicability of the impact assessment, if any, through an independent agency, of CSR projects. In such cases, the impact assessment reports should be placed before the Board and shall be annexed to the annual report on CSR.

The Guiding principles set out hereunder are indicative and not exhaustive and the Board is permitted to carry out such changes herein, as deemed fit and expedient, from time to time.

Note:

The reference to 'Board of Directors' herein shall, unless the context otherwise provides, mean and include Directors or officers so authorised by the Board of Directors of the Company, for the purpose(s) hereunder.



VERSION HISTORY

Version	Approved by	Approval Date	Effective Date
1	Board of Directors	September 15, 2022	September 15, 2022