
RUBAMIN PRIVATE LIMITED

Corporate Social Responsibility Policy

Details of Adoption / Amendments to the Policy			
Policy Adoption/ Change Effective Date	Particular of the Adoption / Change	Board Approval Date	Version of Policy
18.03.2021	Adoption of New CSR Policy	18.03.2021	2021

CSR Policy of Rubamin Private Limited

Corporate Social Responsibility (CSR) at Rubamin portrays the deep symbiotic relationship that the group enjoys with the communities it is engaged with. As a responsible corporate citizen, Rubamin tries to contribute to social and environmental causes on a regular basis. Rubamin believes that to succeed, an organization must maintain the highest standards of corporate behavior towards its employees, consumers and societies in which it operates. Rubamin believes that CSR underlines the objective of bringing about a difference and adding value in our stakeholders' lives.

CSR POLICY AND VISION STATEMENT:

"CSR Policy" means a statement containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan;

Corporate Social Responsibility (CSR) is the Company's contribution to the social and economic development of the local community in which the company operates and to society at large. Rubamin commits to spending a minimum of 2% of the average net profits for the preceding three financial years on CSR activities. The Board of Directors of the Company through its CSR Committee will plan and monitor the expenditure of CSR activities. The CSR Committee will annually recommend the CSR programs and projects to the Board for its approval. The activities undertaken in the ordinary course of business will not be a part of CSR activities.

CONSTITUTION OF CORPORATE SOCIAL RESPONSIBILITY COMMITTEE:

The Board of Directors of the Company has formed a Corporate Social Responsibility Committee (hereinafter referred to as the ('CSR Committee')). The Committee will report to the Board of Directors. The CSR Committee consists of the following Directors:

- Mrs. Ameeta Saini, Chairperson
- Mr. Atul Dalmia, Member
- Mr. Anil R Patel, Member
- Mr Sumit Chandwani, Member
- Mr. Michael Homawalla, Member

RESPONSIBILITIES:

The CSR Committee has following responsibilities:

The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely:-

- (a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;

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- (b) the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
- (c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- (d) monitoring and reporting mechanism for the projects or programmes; and
- (e) details of need and impact assessment, if any, for the projects undertaken by the company:
- (f) Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect. To monitor the Corporate Social Responsibility Policy from time to time.
- (g) To meet at least once a year to review the progress made.

However, in case the Company needs to respond to an urgent need of implementation of the CSR activities, the program may get implemented after obtaining the approval of the CSR task force consisting of Mr. Atul Dalmia and Mr. Anil R Patel within an aggregate limit of Rs. 50 Lakhs in a Financial Year and the same will be placed before the next CSR Committee and Board for ratification. Such program shall be within the activities under the framework of this CSR Policy.”

ACTIVITIES:

The CSR activities we pursue will be in line with our stated Vision and Mission, focused not just around our plants and offices, but also in other geographies based on the needs of the communities. We intend to undertake Corporate Social Responsibilities (CSR) initiatives as permissible activities under Companies Act, 2013 in following areas.

- 1) Eradicating hunger, poverty and malnutrition,
- 2) promoting health care including preventive health care”] and sanitation [including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water.
- 3) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- 4) 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.

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- 5) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, 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].
- 6) 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;
- 7) 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];
- 8) training to promote rural sports, nationally recognised sports, Paralympics sports and Olympic sports
- 9) 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;
- 10) Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government,
- 11) and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).]
- 12) Rural Development projects
- 13) Slum Development areas
- 14) Disaster management, including relief, rehabilitation and reconstruction activities.]
- 15) Such other activities as Board may consider deems fit.

The CSR projects/ activities undertaken by Rubamin will be in the lines with Schedule VII activities and will also include terms incorporated as per amendments to the Schedule VII through subsequent notification, circulars etc released by appropriate authority.

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However, the main focus areas of Rubamin are as follows:

Promotion of education:

The Indian education system till date is largely driven by conventional method of using textbooks as educational material, and lectures for imparting knowledge. This leads to inferior learning outcomes at higher education levels, further reflecting in low skilled manpower in India. Rubamin sees education as the seed of innovation Rubamin proposes to promote education especially at village and primary level. It seeks to partners with expert in the field to achieve the better outcomes. It also involves the entire community in the education of children to partner with e including special education and employment enhancing vocational skills, especially among children, women, elderly, and the differently abled and livelihood enhancement projects inter alia contribution to NGOs who are engaged in providing special education and employment enhancing vocational skills for abled and disabled children, women and elderly persons;

Health and Medical care:

Accelerated urbanization has led to an alarming increase in the rate of health issues, accidental injuries, crime and violence in India. It is well recognized that our health care system is not fully equipped to meet the challenge as significant deficiencies exist in current trauma systems. Most hospitals catering to the underprivileged have inefficient services for medical or trauma care, due to financial constraints and lack of appropriate health infrastructure. Most do not offer prompt diagnoses or life-saving treatment. Consequently death rate in India is estimated to be sevenfold worse compared to most advanced states. Rubamin aims to enhance hospital care through its medical equipment and technology, thus improving survival and functional outcome among patients. Rubamin proposes to provide medical aid to weaker section of society by providing medicines to patients, payment of fees directly to hospitals for poor patients. Rubamin intends to pay for medical cover comprising of various illness for a specified class in rural area.

Ensuring environmental sustainability;

Rubamin is committed to environmental stewardship program. Rubamin is committed to be fully compliant with all applicable environmental regulations. The Company will do following activities-

Environment:

Promote practices that would help conserve natural resources, energy and reduce wastage.

Water:

In water management Rubamin believe, abundant and stable supply of clean water is the basic need of society. Water being an important resource, its conservation has become imperative. The approach would include providing

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support and infrastructure at each stage of water conservation, water preservation, and water re-charge and waste water treatment.

Promotion and protection of Art and Culture:

Art and Culture plays an important role in the development of any nation. It represents a set of shared attitudes, values, goals and practices. Culture and creativity manifest themselves in almost all economic, social and other activities. A country as diverse as India is symbolized by the plurality of its culture. India has one of the world's largest collections of songs, music, dance, theatre, folk traditions, performing arts, rites and rituals, paintings and writings that are known, as the 'Intangible Cultural Heritage' (ICH) of humanity. In order to preserve these elements, Rubamin proposes to promote art and culture by -

- 1) providing financial support to individuals, groups and cultural organizations engaged in all arts including performing, visual and literary arts etc.
- 2) organizing Plays (historical), Games, Musical concerts empowering artists playing Indian music to own and share their music globally and by showcasing diversity of music, exploration of ideas of music from history, literature, popular stories etc.
- 3) Supporting upcoming artists to promote art and help them and market their arts better.

Our approach to implementation

Rubamin will strive to implement the aforesaid CSR activities through the route as follows:

- 1) Directly by the Company
- 2) Rubamin Foundation, a Charitable Trust (Regd No E/6735/Vadodara)
- 3) Collaborating with various organisation, which are registered as a Trust or a section 8 company under the Companies Act, 2013 or Society or NGOs or any other form of entity incorporated in India that specialise in the aforesaid activities.
- 4) Collaborating or pooling resources with other companies to undertake aforesaid CSR activities.

The Board of Directors of the Company shall ensure that the CSR activities are undertaken by the company itself or through below mentioned entities:-

- 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

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- 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.

Provided that with effect from the 1st April, 2021, CSR Activities shall be undertaken by only those entities that have a unique CSR Registration Number issued by the Central Government / Registrar.

Company may engage international organisations for designing, monitoring and evaluation of the CSR projects or programmes as well as for capacity building of Company's personnel for CSR.

Company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with CSR Rules.

The Board of Directors of the company shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

Subject to above provisions, where a company has set up an organization which is registered as a Trust or Section 8 Company, or Society or Foundation or any other form of entity operating *within India* to facilitate implementation of its CSR activities in accordance with its stated CSR Policy, the following shall apply:

- a. The contributing company would need to specify the projects / programmes to be undertaken by such an organization, for utilizing funds provided by it;
- b. The contributing company shall establish a monitoring mechanism to ensure that the allocation is spent for the intended purpose only;

CSR EXPENDITURE

CSR expenditure shall include all expenditure including contribution to corpus, or on projects or programmes related to CSR activities approved by the Board of the Company on the recommendation of the Committee. It will include contribution to bona fide charitable and other funds. CSR activities shall not include the activities undertaken by the Company in the ordinary course of business.

Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR

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policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

The board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.

Where a company spends an amount in excess of requirement provided under sub-section (5) of section 135, such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years subject to the conditions that –

- (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of this rule.
- (ii) the Board of the company shall pass a resolution to that effect.

The CSR amount may be spent by a company for creation or acquisition of a capital asset, which shall be held by –

- (a) a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number under sub-rule (2) of rule 4; or
- (b) Beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
- (c) a public authority.

MONITORING PROCESS:

The Committee shall monitor the above projects, programs, activities and implementation and execution of the same from time to time and report the same to the Board of Directors on a periodical basis. The Committee shall on completion of every financial year, submit to the Board, details of the CSR spent during the financial year and reasons for the actual spent being less than the limits prescribed by the law, if any.

The Board of a company shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period”.

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CSR REPORTING:

The Board's Report of a company covered under these rules pertaining to any financial year shall include an annual report on CSR containing particulars specified in Annexure II, as mentioned in the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021..

(a) Every company having average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

(b) The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.

(c) A Company undertaking impact assessment may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed five percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is less. ”

DISPLAY OF CSR ACTIVITIES ON ITS WEBSITE

The Board of Directors of the Company shall mandatorily disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.

The Committee shall recommend changes/editions to be carried out in the policy to the Board from time to time.

Effective Date: The policy is effective from 22nd January, 2021.

DISCLOSURES:

The Company shall disclose this Policy on its website and a web-link thereto shall be provided in the Annual Report of the Company

AMENDMENTS TO THE POLICY:

The Board shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy.