

CORPORATE SOCIAL RESPONSIBILITY POLICY

RASHI PERIPHERALS LIMITED

RASHI PERIPHERALS LIMITED (“the Company”) believes that the role of the company should not be limited to aggressively achieving its business objectives but should mandatorily include pro-active service to the society in which it operates. The CSR Policy of the Company has been formulated and brought into effect in order to enable the company to fulfill its responsibilities of contributing to the larger good of the people and the planet.

1. SHORT TITLE & APPLICABILITY OF CORPORATE SOCIAL RESPONSIBILITY :-

This policy, which encompasses the company’s philosophy for delivering its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large. It has been prepared keeping in mind the company’s business ethics and to comply with the requirements of Companies Act, 2013 (hereinafter called as “the Act”) and The Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended by the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, notified by the Ministry of Corporate Affairs vide Notification dated 22nd January 2021. This policy shall apply to all CSR initiatives and activities taken up for the benefit of different segments of the society.

This Corporate Social Responsibility Policy (“CSR Policy”) of the Company has been formulated by the CSR Committee and approved by the Board of Directors at its meeting held on 6th April, 2021 in substitution of earlier CSR Policy of the Company. This policy shall be effective from the beginning of financial year 2021-2022.

2. AREAS FOR ACTIVITIES:-

- Eradicating hunger, poverty and malnutrition, promoting health care including preventive 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;
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- 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;
- 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;
- 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 arts and handicrafts;
- Measures for the benefit of armed forces veterans, central Armed Police Forces (CPMF) Veterans and their dependents including Widows.
- Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;

- Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Caste, the Scheduled Tribes, other backward classes, minorities and women;
- Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- Rural development projects.
- Slum area development.
- Disaster management, including relief, rehabilitation and reconstruction activities.
- The company may also contribute to the funds notified by the Central Government under Schedule VII of the companies Act, 2013 as part of CSR activities
- Any other Projects/activities the Government may add from time to time to the Schedule VII of the Companies Act, 2013 or allow through clarifications/ Circulars.
- Any ancillary or incidental activities required to be performed to undertake any of the activities mentioned above subject to the prior approval of the CSR Committee. CSR activities shall be undertaken as projects, programs of activities (either new or ongoing) excluding activities undertaken in pursuance of the normal course of business of the Company.

3. **CORPORATE SOCIAL RESPONSIBILITY COMMITTEE(CSRC):-**

- (I) **Composition:-** The Corporate Social Responsibility Committee shall consist of 3 or more Directors. The below is the Composition of CSRC.

NAME	DESIGNATION	CHAIRMAN/ MEMBER
Mr. Krishna Kumar Choudhary	Whole Time Director	Chairman
Mr. Suresh Pansari	Whole Time Director	Member
Mr. KapalPansari	Whole Time Director	Member

- (II) **Meetings:**

The Committee will meet at least twice in a year to discuss and review CSR activities and Policy. Such other meetings of the Committee can be convened as and when deemed appropriate. The Committee members may attend the meeting physically or via such audio visual means as permitted under the Act. The Committee shall have the authority to call such employee(s), senior official(s) and or externals, as it deems fit. The Company Secretary shall act as Secretary to the Committee.

- (III) **Quorum:**

The quorum for a meeting of the Committee on CSR shall be one-third of its total strength (any fraction contained in that one-third being rounded off as one), or two members, whichever is higher.

- (IV) **Scope & Function of CSR Committee**

- To formulate and recommend a CSR Policy indicating the activities to be undertaken by the company in areas or subject specified in Schedule VII to the Companies Act, 2013.
- To recommend the amount of expenditure to be incurred on the activities referred to in point no. 2 above.
- To formulate and recommend an annual action plan in pursuance of

CSR Policy covering the following aspects:

- (i) the list of approved CSR projects or programs to be undertaken in areas or subjects specified in Schedule VII to the Act;
- (ii) the manner of execution of such projects or programs as specified in rule 4(1) of CSR Rules;
- (iii) the modalities of utilisation of funds and implementation schedules for the projects or programs;
- (iv) monitoring and reporting mechanism for the projects or programs; and
- v) details of need and impact assessment, if any, for the projects undertaken by the company;

*Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect.

*To monitor the CSR Policy as approved by the Board from time to time.

*The CSR Committee should recommend the approach and direction of CSR activities to be undertaken by the company and also provide guiding principles for:-

- (i) Selection of CSR projects / programmes / activities
- (ii) Implementation of CSR projects / programmes / activities
- (iii) Monitoring of CSR projects / programmes / activities
- (iv) Formulation of the annual action plan

4. RESOURCES- FUNDING & ALLOCATION OF FUNDS:-

The Company would spend not less than 2% of the average Net Profits of the Company made during the three immediately preceding financial years. The surplus arising out of the CSR activity will not be part of business profits of the Company. The Corpus would thus include the 2% of average net profits, as aforesaid, any income arising there from and surplus arising out of CSR activities.

All the expenditure relating to CSR shall be pre-approved by the CSR Committee. The CFO shall monitor the utilization of funds for the purposes set forth and certify to this effect. Unspent CSR amount, if any, shall be transferred to separate account in accordance with the applicable CSR Rules from time to time.

The Company may build CSR capacities of its personnel and/or those of its implementing agencies through Institutions with established track records of at least three financial years but such expenditure shall not exceed five percent of total CSR expenditure of the Company in one financial year.

However if the Company ceases to be covered under sub-section (1) of Section 135 of the Act for three financial years, then it shall not be required to, comply with the provisions laid down under sub-section (2) to (5) of the said section, till such time it meets the criteria specified in sub-section (1) of the Act.

5. MODE OF IMPLEMENTATION:-

CSR programs, projects or activities of the company should be implemented through following methods:

- i. Directly by the company;
- ii. Implementing Agencies;
- iii. Any foundation or body incorporated by the company and eligible to undertake such CSR projects.
- iv. in collaboration with other organizations/group companies

While the company can engage suitable Implementing Agencies to undertake approved CSR projects. The company can also partner with local governance bodies, such as Gram Panchayats, Civic Bodies, Municipality to directly undertake

approved CSR projects with the help and support of these bodies.

6. NEED AND IMPECT ASSESSMENT:-

CSR activities undertaken should be in the interest of the society and the local population where the company operates. Before undertaking any project or activities the company shall conduct need assessment for the project and its utility in the demography where project is proposed.

In case average CSR obligation of the Company amounts to ten crore rupees or more in pursuance of sub section (5) of section 135 of the Act, in the three immediately preceding financial years then the Company after one year of completion of CSR project, should consider to conduct an impact assessment of the project so completed and place a report for consideration of the Board. A summary of impact assessment outcome shall be disclosed in the Board's Report.

7. TRANSPARENT MONITORING MECHANISM:-

- The CSR Committee shall prepare a transparent monitoring mechanism for ensuring implementation of the projects / programmes/activities proposed to be undertaken by the Company.
- The CSR Committee shall have the authority to obtain professional advice from external sources and have full access to information contained in the records of the Company as well as the powers to call any employee or external consultant or such other person(s) and for such purpose as may be deemed expedient for the purpose of accomplishments of overall CSR objectives laid down under the Act.
- Monitoring and evaluation is an essential part of any CSR initiative, which help the business in enhancing their CSR programs. The committee shall periodically review the progress of the Projects. It can require the Company to prepare separate income and expenditure for the projects undertaken and review the same.

A list of CSR projects/programmes which the Company plans to undertake during the implementation year will be laid down before the Committee at the beginning of each year, specifying modalities of execution in the areas/sectors chosen and implementation schedules for the same.

Identification of projects and the executing agency/NGO will be made, inter-alia, by assessing the following:

PROJECT OBJECTIVES:

- Baseline survey - As-is and To-be state basis, accordingly the outcome of the project will be measured.
- Implementation schedules - Timelines for milestones of the project will need to be prescribed and agreed upon

8. IMPLEMENTING AGENCIES:-

Projects / Partners CSR Committee in consultation with the Board of Directors of the Company, will identify suitable projects for implementation from time to time in line with the objects of the Company and requirements laid down under the Act. These projects would be executed either directly by the Company and/or through CSR Partner(s) as permitted under the Companies Act, 2013.

The time period/duration over which a particular program will be spread, will depend on its nature, extent or coverage and intended impact of the program.

The CSR committee would further assess on the viability of the projects and its relative benefits to the society and recommend the same to the Board for its approval for implementation.

9. REVIEW AND REPORTING/ MONITORING:-

The Company will report, in the prescribed format the details of CSR initiatives and activities of the Company in the Board Report and on the website of the Company, as required under the Regulations.

Initiatives undertaken on the CSR front will be reported in the Annual Report of the Company as per the format prescribed under Companies Act, 2013 and rules made thereunder.

10. AMENDMENTS TO THE POLICY :-

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this Policy, as and when required as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Act on the subject as may be issued from relevant statutory authorities, from time to time

11. Modalities of utilization of funds for the projects or programmes:-

The CSR budget, fixed in accordance with the provisions of the Companies Act, 2013, rules framed thereunder and the CSR Policy framed by the Company will be spent on CSR activities approved by the Board on the recommendation of the CSR Committee.

For some projects or programmes, the Company makes contribution to the implementing agencies for incurring the expenses for fulfilment of the project while for few projects, the Company directly disburses makes payment to the beneficiaries with the approval of person/(s) authorised for this purpose.

The CSR Committee with the approval of the Board shall decide the manner of disbursing the funds to the implementing agencies.

The Company shall collect all the required documents/information from the implementing agencies

12. Manner of Execution of such projects/programmes:-

The Company to undertake the above mentioned projects itself or through any entity/company/ public trust/ society as mentioned in sub-rule 1 of Rule 4 Companies (Corporate Social Responsibility Policy) Rules, 2014 including any re-enactment, modifications or amendments thereof.

13. Capital Assets:-

Capital asset acquired or created by CSR projects should be held by the beneficiaries of the said CSR project or a trust or a public authority for the benefits of all. The company should take appropriate measure to ensure that such assets are utilized for the purpose it was meant for and should not be transferred or

disposed off without prior permission of the company.

14. Information dissemination:-

CSR Policy and activities undertaken shall be disseminated on website for public access and shall be published in the Annual Report of the company in the format prescribed under the Act and CSR Rules.
