



## **CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR)**

### **INTRODUCTION:**

Corporate Social Responsibility (CSR) is the Company's commitment to its stakeholders to conduct business in a socially and environmentally sustainable manner that is transparent and ethical.

Ravi Foods Private Limited ("RFPL") is committed to undertake CSR activities in accordance with the provisions of Section 135 of the Companies Act, 2013 read with relevant Rules.

The Company believes that corporate development has to be inclusive, and every corporate has to be responsible for the development of a just and humane society that can build a national enterprise. The Company commits itself to contribute to society in ways possible for the organization.

### **AIMS & OBJECTIVES:**

- To develop a vision and strategy for The Company's CSR objectives (Long term and other wise)
- Establish relevance of potential CSR activities to The Company's core business and create an overview of activities to be undertaken, in line with Schedule VII of the Companies Act, 2013.
- The Company shall promote projects that are :
  - (a) Sustainable and create an impact both long term and otherwise;
  - (b) Have specific and measurable goals in alignment with The Company's philosophy;
  - (c) Address the most deserving cause or beneficiaries.
- To establish process and mechanism for the implementation and monitoring of the CSR activities for the Company.

### **DEFINITION:**

"Corporate Social Responsibility (CSR)" means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the "Rules"), but shall not include the following, namely:



1. activities undertaken in pursuance of normal course of business of the company;
2. any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
3. contribution of any amount directly or indirectly to any political party under section 182 of the Act;
4. activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
5. activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
6. activities carried out for fulfilment of any other statutory obligations under any law in force in India;

### **CORE AREAS OF CSR:**

1) The CSR objective of the Company will be achieved through concentrated and dedicated initiatives encompassing the following identified core areas:

- Education
- Health & Medical Care
- Community at large
- Environment
- Sports

2) Any other initiative/s which may not fall under the purview of the above core areas, but fall under purview of Schedule VII of Companies Act, 2013, as may be amended may also be taken up by the Company, subject to recommendation of the CSR Committee and approval by the Board members.

3) Alternatively, the CSR Committee may choose to focus on any one or more of the above core areas for its efforts dedicated towards CSR.

### **COMMITTEE COMPOSITION:**

The CSR Committee of the Board shall be composed of at least three (3) Directors in accordance with applicable statutory requirements. The Board has the authority to reconstitute the Committee from time to time.

### **COMMITTEE MEETINGS:**

The CSR Committee shall meet as often as its members deem necessary to perform the duties and responsibilities, but no less than once a year.



### **DUTIES & RESPONSIBILITIES OF CSR COMMITTEE:**

- Review of the CSR activities to be undertaken by The Company. The CSR Committee shall be guided by the list of activities specified in Schedule VII to the Companies Act, 2013, including the activities appended to this Policy as Appendix – 1. Appendix 1 may be revised in line with any amendments/inclusions made to Schedule VII of the Companies Act, 2013.
- Formulate and recommend to the Board CSR Policy which shall indicate the activities to be undertaken by the Company.
- Monitor the activities being undertaken under the Corporate Social Responsibility Policy of the Company, from time to time.
- Recommend the CSR Expenditure to be incurred on the CSR activities/programs. Institute a transparent mechanism for implementation of the CSR projects and activities.
- Prepare an annual report of the CSR activities undertaken for the Company and submit such report to the Board. The CSR Committee shall be apprised by a Chairman who shall be appointed by the Board.
- Approve the CSR Policy and the CSR Expenditure as per the applicable provisions of the Companies Act, 2013 and/or any other law time being in force.
- Ensure the CSR spending every financial year of [at least 2% of average net profits] made during immediately preceding 3 financial years, in pursuance with the Policy.
- Ensure disclosure of the contents of the CSR Policy on the Company's website.

### **CSR EXPENDITURE:**

- In every financial year, the Company shall spend a minimum of 2% of its average Net Profits in the immediately preceding three (3) financial years or such other amount as may be computed in accordance with the applicable provisions of the Companies Act 2013, as amended from time to time. Average Net profits shall mean the net profits of the Company as per the Profit & Loss Statement prepared in accordance with the applicable provisions of the Companies Act, 2013 and Rule 2(f) of the Companies (Corporate Social Responsibility) Rules, 2014.
- CSR Expenditure shall mean all expenditure incurred in respect of specific projects/programs relating to the approved CSR activities to the extent the same is in compliance with the Companies Act, 2013 and the CSR Rules read with the Income Tax Act, 1961.
- It is clarified that CSR Expenditure shall not include expenditure on an item not in conformity or not in line with activities which fall within the purview of the CSR activities listed in Schedule VII.



- CSR Expenditure shall not include Projects or programs or activities undertaken outside India.
- The surplus arising out of the CSR activities or projects shall not form part of the business profit of the Company.
- Excess amount incurred on CSR activities in any financial year may be set off against the requirement to spend under Section 135(5) up to immediately succeeding 3 financial years provided that the excess amount available does not include the surplus arising out of the CSR activities.

### **CSR ACTIVITIES – PROJECTS:**

- The CSR activities shall be undertaken in locations within India. The Company shall give preference to the local areas and the areas around which the Company operates while considering the activities to be undertaken and spending the amount earmarked for CSR activities. However, since the Company has a multi-state presence and hence may be guided by the requirements of the specific CSR activity/program in determining the locations within India.

### **IMPLEMENTING CSR ACTIVITIES:**

- The Company may undertake the CSR activities directly and also through various implementing agencies such as, NGO's, non-profit organizations, etc. Such implementing agencies shall have an established track record as prescribed under the law.
- The Company may undertake the CSR activities through Companies that are established under Section 8 of the Act or a registered society or registered trust established by the Central or State Government.
- The Company may undertake the CSR activities by 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 any entity established under an Act of Parliament or a State legislature; or 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 initiatives undertaken may be communicated to the employees through specific awareness campaigns, so as to enable maximum participation.



- The Company may also collaborate or pool resources with other companies to undertake CSR activities in such a manner that each companies are in a position to report separately on such CSR projects.
- The CSR committee shall monitor the implementation of CSR activities by periodical review and also ensure that the activities are undertaken as per the policy.
- The following activities do not qualify as CSR Activities under the Companies Act, 2013:
  - a) Projects or activities not falling within Schedule VII of the Companies Act, 2013 read with Appendix 1;
  - b) Projects or programs or activities that benefit only the employees of RFPL and their families.
  - c) Direct or indirect contribution to any political party.

#### **CSR REPORTING:**

- The Board in its Annual Report shall include the details of the composition of the CSR Committee and CSR activities undertaken in the Financial Year.
- Where the Company has not made the requisite CSR Expenditure, reasons for failure (if any) to spend required amount on CSR activities.
- The CSR Committee shall provide a responsibility statement on the implementation and monitoring of the CSR Policy and that it is in compliance with CSR objectives of the Company, which statement shall form part of the Boards' Report.
- The Board's Report shall include an annual report on CSR containing particulars specified in Annexure II of the Companies (Corporate Social Responsibility Policy) Rules, 2014 and any other applicable law.
- The Company shall make any other reporting to made in compliance with applicable law

#### **UNSPENT FUND:**

- The Board will ensure that the unspent amount which is not related to ongoing projects will be transferred to a Fund specified in Schedule VII, within a period of 6 months of the expiry of the financial year or any other period as may be notified under the provisions of Act.
- Further, the unspent amount related to an on-going project will be transferred to a special account for that financial year called the Unspent Corporate Social Responsibility Account("Unspent CSR Account") within a period of 30 days from the closure of the Financial year or any other period as may be notified under the provisions of Act.
- Any surplus arising out of the CSR activities/project shall be ploughed back into such project or transferred to the Unspent CSR Account and spent in accordance with the action plan of the Company or to the Fund specified in Schedule VII, within a period of 6 months of the expiry of the financial year or any other period as may be notified under the provisions of Act.



**WEBSITE DISPLAY:**

The Company shall display on its website the contents of its CSR Policy and other information as may be required to be displayed.

**AMENDMENTS:**

The Policy shall be reviewed by the CSR Committee from time to time for any modifications or amendments, including due to changes in the Companies Act, 2013 / Companies (Corporate Social Responsibility Policy) Rules, 2014. The modifications/ amendments in the Company's CSR Policy, as recommended by the CSR Committee shall be subject to approval of the Board.



## APPENDIX - 1

### CSR Activities Listed in Schedule VII of the Companies Act, 2013

- i. 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.
- 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 recognized sports, Paralympic sports 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. (a) 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; and



(b) 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).

x. Rural development projects

xi. Slum area development.

Explanation.- For the purposes of this item, the term `slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

xii. Disaster management, including relief, rehabilitation and reconstruction activities.