



Key2Elements

RANGOLI TRADECOMM LIMITED

CIN: U51909WB2009PLC137310

CORPORATE SOCIAL RESPONSIBILITY POLICY

PREAMBLE:

The Company undertakes the Corporate Social responsibility as a genuine expression of goodwill and gratitude towards society and is keen to make significant contributions towards development of social infrastructure, economic, environmental and social upliftment of communities in and around the areas of its operation in the major thrust areas such as community development, promoting education, creating awareness for conservation of energy, environment sustainability, healthcare etc. through its service, conduct, business practice and social initiatives.

OBJECTIVE:

The Corporate Social Responsibility Policy (hereinafter referred to as "the Policy" or "CSR Policy") of Rangoli Tradecomm Limited ('the Company' "RTL") has been formulated by the CSR Committee and is being framed to align the Company's corporate social responsibility activities keeping in mind the company's business ethics and to comply with the requirements of Companies Act, 2013 (hereinafter called as "the Act") read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 framed under the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, notified by the Ministry of Corporate Affairs vide Notification dated 22nd January 2021 including any subsequent amendment thereto from time to time.

The objective of the CSR Policy is to contribute positively towards sustainable and inclusive growth of the society with focus on India's most pressing development challenges as highlighted under schedule - VII of the Companies Act, 2013 and as amended from time to time. The Policy shall apply to all the CSR projects, programmes or activities (herein after referred to as CSR Activities) undertaken by the Company.

The activities enlisted in this CSR Policy are aligned with the group CSR Policy of "Suumaya" (name of and are carried out by the company either individually or in association with eligible Implementing Agencies registered with the Ministry of Corporate Affairs.

EFFECTIVE DATE:

This policy shall be effective from the beginning of financial year 2021-22.

DEFINITIONS:

"Act" means the Companies Act, 2013 (Act No. 18 of 2013) or any previous enactment thereof, or any statutory modification thereto or re-enactment thereof and includes any Rules and Regulations framed thereunder.

"Board of Directors" or "Board", in relation to a company, means the collective body of the directors of the company.

Shun



“Company” means “Rangoli Tradecomm Limited (“RTL”).

“CSR Committee” means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act.

“CSR Policy” means CSR Policy of RTL.

“CSR Rules” means the Companies (Corporate Social Responsibility Policy) Rules, 2014 framed under the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, notified by the Ministry of Corporate Affairs vide Notification dated 22nd January 2021 including any subsequent amendment thereto from time to time. .

“Implementing Agency” means an entity amongst the following categories and having unique CSR registration number issued by MCA:

(i) A company established under section 8 of the Companies Act, 2013 with section 12A and section 80G registrations under the Income Tax Act, 1961, established by the company, either singly or along with any other company OR having an established track record of at least three years in undertaking similar activities.

(ii) Registered Public Trust with section 12A and section 80G registrations under the Income Tax Act, 1961, established by the company, either singly or along with any other company or having an established track record of at least three years in undertaking similar activities.

(iii) Registered Society with section 12A and section 80G registrations under the Income Tax Act, 1961, established by the company, either singly or along with any other company or having an established track record of at least three years in undertaking similar activities.

(iv) Company established under section 8 of the Companies Act, 2013 or Registered Trust or Registered Society established by the Central Government or State Government.

(v) Entity established under an Act of Parliament or State Legislature.

“Listing Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, including any amendment thereto from time to time.

Any term used in this policy but not defined herein shall have the same meaning assigned to them under the Act and CSR Rules as applicable to the company.



CSR ACTIVITIES:

The Company shall carry out CSR Activities in consonance with the provisions of the Section 135 read with Schedule VII to the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, as amended from time to time. Schedule VII to the Act is attached as **Annexure A**. The Company will take up activities for Community support & Environmental sustainability by providing necessary support, including supply of gas at free of cost, to crematories and other social projects in the areas around Company's operations and other cities.

This Policy will apply to CSR Activities approved by the Board of Directors, from time to time, and taken up for implementation preferably in and around the areas of its operation including other business establishments and surrounding areas thereto located within the territorial limits of India.

RTL is committed to implement CSR Activities as prescribed under Schedule VII of the Act, for socio economic upliftment of all the stakeholders, on sustainable basis.

APPLICABILITY:

The CSR policy has been developed in consonance with Section 135 of the Companies Act, 2013 (referred to as the Act in this policy) on CSR and in accordance with the Companies (Corporate Social Responsibility) Rules, 2014 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, notified by the Ministry of Corporate Affairs vide Notification dated 22nd January 2021. (hereby referred to as the Rules) notified by the Ministry of Corporate Affairs, Government of India.. The Policy shall apply to all CSR projects/programmes undertaken by the Company in India as per Schedule VII of the Act.

SCOPE:

The scope of this policy is to strategically draw the guiding principles for selection, implementation and monitoring of CSR activities as well as formulation of the annual action plan by the Board of the Company, after taking into account the recommendations of its CSR Committee.

The said policy can be read in alignment with the requirements of Section 135 of the Companies Act, 2013 ('the Act') and the corresponding rules made there under, as amended from time to time ('CSR Rules'), Schedule VII of the Act.

REPORTING FOR CSR:

Rule 8 of the CSR Rules provides that the companies, upon which the CSR Rules are applicable on or after 1st April, 2014 shall be required to incorporate in its Board's report an annual report on CSR containing the following particulars:

Shrini


- A brief outline of the company's CSR Policy, including overview of projects or programs proposed to be undertaken and a reference to the web-link to the CSR policy and projects or programs;
- The composition of the CSR Committee;
- Average net profit of the company for last three financial years;
- Prescribed CSR Expenditure (2% of the amount of the net profit for the last 3 financial years);
- Details of CSR Spent during the financial year;
- In case the company has failed to spend the 2% of the average net profit of the last three financial year, reasons thereof.

ROLE OF CSR COMMITTEE:

The CSR Committee shall undertake the following functions:

- a) Formulate and recommend to the Board, a CSR Policy on the basis of the approach and direction given by the Board, which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII to the Act and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan; [section 135(3)(a) of the Act read with rule 2(f) of CSR Rules];
- b) Recommend the amount of expenditure to be incurred on the activities referred to in clause (a) by way of formulating and recommending to the Board, an annual action plan in pursuance of CSR Policy of the company including the following:
 - (i) the list of CSR projects or programs that are approved 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;
- c) Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect.. [section 135(3)(b) of the Act read with rule 5(2) of CSR Rules]



Shim

- c) monitor the CSR Policy of the company from time to time. [section 135(3) (c) of the Act]

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

CSR Spending:

The company shall endeavour to achieve the objectives of CSR Policy and allocate every year:

- a. Minimum 2% of its average net profits made during the three immediately preceding financial years
- b. Any income or surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the company and the same shall be ploughed back for use in CSR activities

All the expenditure relating to CSR shall be pre-approved by the CSR Committee.

Unspent CSR amount, if any, shall be transferred to separate account in accordance with the applicable CSR Rules from time to time [Second proviso of Section 135 (5)].

THE GEOGRAPHIC REACH:

The Act provides that the Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility. The Company will thus give preference to conducting CSR activities in the state of Maharashtra herein the Company has/will have its operations. However, the Committee may identify such areas other than stated above, as it may deem fit, and recommend it to the Board for undertaking CSR activities.

IMPLEMENTATION:

The Company shall strive to implement the aforesaid CSR activities on its own to the extent possible. At the same time, the Board recognizes the need to work in partnership with other agencies specified under the CSR Rules. This would include:

- Collaborating with various organizations having an established track record in carrying out a similar activity, which are registered Trusts or Section 25 or Section 8 companies under the Companies Act or registered Societies that specialize in the aforesaid activities having registration under Section 12A and Section 80G of the Income Tax Act, 1961.



Shivam

- Collaborating or pooling resources with other companies to undertake aforesaid CSR activities.

For CSR activities undertaken through other Executing Agency, the Company will specify the projects or programmes to be undertaken through these agencies, the modalities of utilization of funds on such projects or programmes and such specialized agencies would include:

- i. Community based organization whether formal or informal.
- ii. Elected local bodies such as Panchayats
- iii. Voluntary Agencies (NGOs)
- iv. Institutes/Academic Organizations
- v. Trusts, Mission etc.
- vi. Self-help groups
- vii. Government, Semi Government and autonomous Organizations.
- viii. Standing Conference of Public Enterprises (SCOPE)
- ix. Mahila Mondals/Samitis and the like Contracted agencies for civil works Professional Consultancy Organization etc.

CSR Corpus/Fund:

The CSR corpus for the purpose of carrying on the aforesaid activities shall be arrived at on computation of two percent of the average net profits of the Company made during the 3 (three) immediately preceding financial years calculated in accordance with the provisions of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014. For this purpose, the net profit and average net profit shall be calculated in accordance with the provisions of Section 198 of the Act read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

Any income arising there from and surplus generated from CSR projects undertaken by the Company shall be tracked and channelized into the CSR corpus. These funds shall be further used in development of the CSR projects and shall not be added to the normal business profits.

The tax treatment of CSR spent will be in accordance with the Income Tax Act, 1961 as may be notified by the central board of Direct taxes.

Annual Action Plan

The CSR Committee shall formulate and recommend to the Board, an annual action plan which shall include the following:

- (a) the list of CSR projects or programmes that are approved and to be undertaken by the company



- (b) the manner of execution of such projects or programmes
 - (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.

The Board of Directors are empowered to alter the annual action plan during the financial year, if so recommended by the CSR Committee, based on the reasonable justification for such change.

WHAT IF A COMPANY CEASES TO BE COVERED UNDER SECTION 135?

Rule 3(2) of the Corporate Social Responsibility Rules, 2014 provides that every company which ceases to be a company covered under section 135(1) of the Act for three consecutive financial years shall not be required to:

- a. constitute a CSR Committee ; and
- b. comply with the provisions contained in subsection (2) to (5) of the said section till such time it meets the criteria specified in sub section (1) of Section 135.

Accordingly, if a company, for 3 consecutive years, ceases to be covered under the ambit of section 135(1), it shall not be required to fulfil the conditions relating to the constitution of CSR Committee and other related provisions.

Monitoring:

Monitoring of CSR projects goes concurrently with implementation and it is an integral part of the CSR activity. Monitoring is essential to assess if the progress is on expected lines in terms of timelines, budgetary expenditure and achievement of milestones. In terms of rule 4(5) of CSR Rules, the Board of a company shall satisfy itself that the funds so disbursed by it for carrying out CSR implementation have been utilised for the purposes and in the manner as approved by it.

Also, in case of on-going projects, rule 4(6) of CSR Rules says that 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.

Accordingly, the Board of Directors has constituted a Corporate Social Responsibility (CSR) Committee of the Board which formulates and recommends to the Board the CSR policy and the annual action plan.

The block contains a handwritten signature in blue ink and a circular blue stamp. The stamp has the text "SUMEET CORPORATION LIMITED" around the perimeter and a small star at the bottom.

The CSR committee to monitor the progress of the annual action plan and the multi-year programs, their manner of execution, modalities of utilization of funds and implementation schedules along with details of need and impact assessment for projects as required.

Information dissemination:

Contents of this Policy shall be disclosed in the Report of the Board of Directors. This Policy shall also be placed on the website of the Company.

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.

Policy Guidelines:

- All CSR Projects must be aligned as prescribed in Schedule VII of the Companies Act, 2013
- CSR projects or programmes or activities must be undertaken in India alone.
- CSR activities must not include the activities undertaken in pursuance of normal course of business of the Company
- Projects or programmes or activities that benefit only the employees of the Company and their families shall not be considered as CSR.
- CSR activities should be in project programme mode. One-off events such as marathons/awards/ charitable contribution/ advertisements / sponsorship of TV programmes etc. will not qualify as part of CSR expenditure.
- Contribution of any amount directly or indirectly to any political party shall not be considered as CSR.

Approval and amendments to the policy:

The Board of Directors are authorised to amend this Policy on recommendation of the CSR Committee as may be required from time to time, subject to applicable laws;

Any amendment(s) in the statutory/regulatory requirements shall be deemed to be included in the CSR Policy and binding on the Company even if statutory amendments are not specifically incorporated in this Policy.



A handwritten signature in blue ink, appearing to read 'Shrin'. The signature is written in a cursive style.

Annexure-A

Following focus areas as notified under Section 135 of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, notified by the Ministry of Corporate Affairs vide Notification dated 22nd January 2021 including any subsequent amendment thereto from time to time.:

A. The company shall undertake such activities which are broadly related to any of the following:

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation
- (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.
- (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 and olympic sports.
- (viii) Rural development projects
- (ix) Development of area declared as "slum area" by the Government or Competent Authority.
- (x) Disaster management, including relief, rehabilitation and reconstruction activities.

B. The company may also contribute to the following funds as part of CSR activities:



A handwritten signature in blue ink, appearing to be 'Sham', written over the right side of the circular stamp.

- (i) Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- (ii) Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- (iii) 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 Government for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- (iv) 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;
- (v) 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).



Shiv