

RISHIROOP LIMITED

Policy on Corporate Social Responsibility (CSR)

1. PREAMBLE

Corporate Social Responsibility is a process through which a Company contributes to the economic and social development of communities in which it operates. CSR is the Company's commitment to integrate social and environmental concerns in its business operations while recognizing the interest of all its stakeholders.

Pursuant to the provisions of Section 135(3) read with Companies (Corporate Social Responsibility Policy) Rules, 2014 and Schedule VII of Companies Act, 2013, the CSR Committee is required to formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken by the Company in areas or subject specified in Schedule VII.

2. OBJECTIVES

The objective of undertaking Corporate Social Responsibility is to ensure that the weaker sections of the society develop sustainable models which will improve their life. Rishiroop Limited is committed to working together with all stakeholders to weave sustainability in its business model and thereby minimize negative impact of its operations on the environment and society. Promoting education and health care are the priority areas identified for the CSR activities.

3. SCOPE

The policy will apply to all projects/ programs undertaken as a part of Company's CSR activities. This policy is in line with Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

4. GOVERNANCE

The overall governance of CSR activities and CSR policy will be responsibility of the CSR Committee. The policy may be revised as and when the scope of the activities undergoes a change.

5. CSR COMMITTEE

The Company has constituted a CSR Committee of the Board consisting of three or more Directors including at least one Independent Director, as may be required under the applicable law/rules framed.

The CSR Committee will be responsible for the following:

- 1) To formulate the CSR Strategy & Policy.
- 2) To monitor the CSR Policy from time to time
- 3) To review the projects/ programs periodically
- 4) To ensure legal and regulatory compliance from CSR viewpoint
- 5) To ensure reporting and communication to stakeholders.

6. CSR BUDGET

The overall amount to be committed to CSR will be approved by the Board on the recommendation of the CSR committee. The contribution will be in adherence to the provisions of the Companies Act, 2013.

7. ANNUAL ACTION PLAN

Annual Action Plan refers to the list of CSR projects that a company is devising to undertake specifically during the financial year.

In accordance with Rule 5(2) of Companies (CSR Policy) Rules, 2014, the Committee shall formulate and recommend to the Board, 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;
- (b) The manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
- (c) The modalities of utilization 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.

8. SUPERVISION

The CSR activities are driven under the guidance of the CSR Committee.

9. IMPLEMENTATION

The company will undertake various projects falling within the CSR objectives of the Company in line with Schedule VII of Companies Act, 2013. The implementation of various initiatives will be ensured with involvement from implementing agencies like Trusts, NGOs, Societies, Other Companies established by the company which has been registered with the Central Government for undertaking CSR activities in compliance with Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended). Employees/ Employees of group maybe engaged full-time/part-time for implementation. In case the Implementing agency being an entity

not established by the company or its holding or subsidiary or associate company, it shall have an established track record of three years in undertaking similar programs or projects.

The resources of the Group Companies may also be used for the implementation of the programs/projects related activities.

10. DISBURSEMENTS

The disbursements will be in installments or one-time payment depending on nature and requirement of project. The terms and conditions of disbursements will be agreed upon between the company and the entity implementing the project.

11. MONITORING

The CSR Committee shall be responsible for maintaining transparent monitoring and reporting mechanism for ensuring effective implementation of the projects/programs/activities proposed to be undertaken by the Company. Monitoring will be ensured through meetings, visits, progress status reports by project/program heads. The Committee will provide a responsibility statement which states that the implementation and monitoring of the CSR Policy is compliance with CSR objectives and Policy of the company.

12. REPORTING

Details of CSR programs/ projects will be reported the Company's Annual Report through a separate report named 'Annual Report on CSR Activities' as an annexure to the Directors Report in compliance with Companies Act, 2013. The board approved CSR policy will be displayed on the company's website in compliance with Companies Act, 2013.

13. GENERAL GUIDELINES

- 1) The scope of the projects / programs will be implemented within India.
- 2) The Company shall give preference to the local areas in which it operates.
- 3) The CSR activity does not include activities undertaken in pursuance of normal course of business of the Company.
- 4) The surplus arising out of CSR projects or programs shall not form part of the business profit of the company.
- 5) Unspent CSR amount shall be transferred to Unspent CSR Account in scheduled bank within thirty days from end of financial year in case of ongoing project, and in any other case, unspent CSR amount be transferred to Fund specified in Schedule VII of the Companies Act, 2013 within six months of end of financial year.

14. REVIEW AND AMENDMENTS:

The Board shall have the power to amend and update 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 in order to adhere to the amendments issued by the regulatory authorities from time to time.

Last updated on: August 7, 2026
