

**Corporate Social Responsibility Policy**  
**of**  
**Rushil Decor Limited**

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## **1. Concept and Vision:**

The Company has made this policy titles as the “Corporate Social Responsibility (CSR) Policy” which is based as per the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014 which encompasses the Company’s Philosophy for defining it. The Company intends to make a positive difference to society and contribute its share towards the social cause of betterment of society. The policy is to be formulated and recommended by the CSR Committee to the Board and adopted by the Board of Directors at its meeting. The Board may, upon recommendation of the CSR Committee, amend or modify the CSR Policy as and when necessary.

## **2. Purpose**

This policy aims to contribute towards sustainable development of the society and environment to make planet a better place for future generations.

The activities enlisted in this CSR Policy are aligned with the group CSR Policy of Rushil Décor Limited and is carried out by the company either individually or in association with eligible Implementing Agencies registered with the Ministry of Corporate Affairs.

The CSR Policy is formulated in accordance with the provisions of section 135 of the Companies Act, 2013 and rules made thereunder and other applicable laws to the company. This policy was lastly revised and approved vide a board meeting held on 12.02.2022.

## **3. Definitions**

- i. “Act” means the Companies Act, 2013.
- ii. “Board of Directors” or “Board” means the collective body of the directors of the company.
- iii. “Company” means “Rushil Décor Limited”
- iv. “CSR Committee” means Corporate Social Responsibility Committee constituted by the Board of Directors of the company.
- v. “CSR Policy” means CSR Policy of Rushil Décor Limited
- vi. “CSR Rules” means the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.

- vii. “Implementing Agency” means any entity registered with Ministry of Corporate Affairs for undertaking CSR projects, which is engaged by the company to implement various projects in pursuance of CSR Policy.

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.

#### **4. Functions of CSR Committee**

CSR Committee was constituted by the Board of Directors with following functions assigned:

- a) 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 Act;
- b) To recommend the amount of expenditure to be incurred on the activities referred to in clause (a);
- c) 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 details of need and impact assessment, if any, for the projects undertaken by the company;
- d) Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect.
- e) 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 Guidance Note on Corporate Social Responsibility
- iii. Monitoring of CSR projects / programmes / activities
- iv. Formulation of the annual action plan

## **5. CSR Activities**

Company shall undertake CSR activities for development of the society and the environment, particularly in the vicinity of the areas where the facilities of the company are located.

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:

- i. Swatch 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 Defence 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).

The above areas as enshrined in Schedule VII to the Act and included in this Policy aims to provide macro areas in which CSR projects should be undertaken by the company. The CSR Committee should consider details of CSR projects as elaborated in the annual action plan for each financial year. Any CSR activity proposed to be undertaken as a CSR initiative, but not specifically covered in the aforesaid, may be undertaken only with the prior approval of the Board and CSR Committee.

## **6. 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.

## **7. 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.

## **8. Implementation and monitoring of CSR Projects:**

### **Project Implementation:**

The company will implement CSR projects either by other Implementing Agencies which fulfil the criteria laid down in 2013 Act and the CSR Rules and which are registered with MCA. Projects are implemented in strict compliance with requirements laid down in the CSR Rules and in accordance with the socio-economic needs of India. Implementation will be in adherence to approved Annual Action Plan for the financial year.

### **Project Monitoring:**

The company has a dedicated team of project managers to monitor implementation of projects which hold regular discussion with Implementation Agencies, ("IAs") undertake regular site visits and seek periodic reports from IAs. The CSR Committee also ensure periodic monitoring of projects. Payments to IAs are made as per the milestones achieved by them in accordance with the agreement executed for projects.

Project managers ensure that IAs submit periodic pictures of project sites and videos (both before and after completion of projects), as well as feedback of people living in the communities/ project beneficiaries.

## **9. CSR spends:**

### **Annual CSR spends**

The company is committed to spend 2% of its average net profits made during the immediately preceding three financial years on CSR activities every financial year. If during any financial year the company spends an amount in excess of 2% of its average net profits, the same will be

considered as excess CSR spends for the financial year and will be set-off in the immediately succeeding three financial years subject to fulfilment of conditions prescribed under the 2013 Act and the CSR Rules, if the Board decides to do so.

**Limits on CSR spends:** Administrative overheads on CSR activities will not exceed 5% of total CSR spends in any financial year. Total spends incurred on conducting mandatory Impact Assessment Studies of CSR projects will not exceed 5% of total CSR spends of the company for a financial year or Rs. 50 Lacs, whichever is less. The company shall not acquire any capital asset out of its CSR spends. In case it does, the said capital asset will be held by Implementing Agency/ Beneficiaries of the Project/ Public Authority, in the manner specified in the 2013 Act and the CSR Rules.

**Unspent CSR amount:** Unspent CSR amount, if any, at the end of a financial year, shall be segregated into those in relation to 'ongoing' and 'other' projects and will be dealt with in the manner prescribed under the 2013 Act and the CSR Rules.

**Excess CSR spends:** If in any financial year the company spends on CSR activities in excess of the obligated 2% of average net profits, the Board may decide to set-off the same in the immediately succeeding three financial years, subject to conditions prescribed under the 2013 Act and the CSR Rules.

'Income' or 'Surplus' arising out of CSR activities: 'Income', or 'Surplus', if any, arising out of CSR activities, shall not form part of company's business profits and shall be ploughed back in the same CSR project or transferred to "Unspent CSR Account" and spent in pursuance of CSR Policy and the Annual Action Plan on CSR activities.

## **10. Governance**

**Board of Directors:** The Board reviews the impact of CSR activities, provides inputs and satisfies itself that the CSR spends are aligned to the CSR Policy and has been utilized for the purposes and in the manner as approved by it. In addition, at the end of financial year, the CFO shall certify to the Board that CSR spends have been utilized for the purposes and in the manner approved by the Board.

**CSR Committee:** CSR Committee provides guidance on CSR activities and monitors compliance with CSR Policy, commitments, and applicable CSR provisions. The scope and role of CSR Committee shall be as set out in the 2013 Act and the CSR Rules and as laid down in the Charter of CSR Committee.

**11. 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.

**12. Review**

The CSR Committee shall be fully responsible for the monitoring and review of the implementation of this policy in accordance with applicable laws from time to time. The CSR Committee shall provide recommendations as and when it deems necessary to the Board so as to amend/ modify/ revise the CSR Policy.

**13. Clarifications, Amendments and Updates**

This Policy shall be implemented as per the provisions of the Applicable Law. Any amendments in the Applicable Law and/or Regulations, including any clarification/circulars of relevant regulator, shall be read into this Policy such that the Policy shall automatically synchronize the application of Applicable Law at the time of its implementation.

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