

**CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY**

**RASHI FINCORP LIMITED**

**2024-25**

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**1. Preamble**

Rashi Fincorp Limited ('RFL' or 'Company') is a Base layer, Non- Systemically Important, Non-Deposit taking, Non-Banking Financial Company ("NBFC-NDSI") registered under section 45-IA of the Reserve Bank of India Act, 1934. The Company has also registered with Ministry of Corporate Affairs (MCA) under the provisions Companies Act 1956 and the Ministry of Corporate Affairs ("MCA") has introduced the concept of Corporate Social Responsibility ("CSR") in the Companies Act, 2013. CSR is a Company's sense of responsibility towards the community and environment in which it operates. It is a continuing commitment by businesses to behave ethically and contribute to economic development of the society at large and building for sustainable livelihoods.

**2. Objectives of Corporate Social Responsibility Policy**

To provide a broad framework, principles and guidelines to the CSR Committee/Board for conduct of CSR activities of the Company. This policy will serve as a guiding document to help identify, execute and monitor CSR Activities /Projects in keeping with the spirit of the policy.

The CSR Policy would function as a self-regulating mechanism for the Company's CSR activities and enable adherence to laws, ethical standards and international practices in this regard.

**3. Scope**

This policy will apply to all projects/programs undertaken (either directly or through a Registered Trust or through a Registered Society or establish another company under Section 8 of the Companies Act, 2013 or even to collaborate with other entities as approved by the CSR Committee/Board) as a part of the company's Corporate Social Responsibility activities and will be developed, reviewed and updated by reference to relevant codes of corporate governance and international standards or best practices. This policy is in line with the Section 135 of Companies Act, 2013 (Act), The Companies (Corporate Social Responsibility Policy) Rules, 2014 (Rules) and Schedule VII of Companies Act, 2013 as amended from time to time ('CSR Laws').

**4. CSR Programs/Projects**

The Company is highly supportive of the involvement of its employees in its CSR initiatives and in community activities/ charities of their choice and will therefore proactively engage with employees and other key stakeholders to solicit their active involvement in the Company's CSR programs.

To provide a focused and structured approach to the program, the company will focus its support and CSR spends on specific pre-determined causes and areas of intervention as outlined below as per Schedule VII of the Companies Act 2013.:

- I. Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare 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 centers 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, 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.
- 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 arts 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 Government for socio-economic development and relief and welfare of the scheduled 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 Organization (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 (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.

The scope of CSR Activities shall always be subject to the provisions of the Act and shall Suo-moto stands amended in line with the amendments in the Act from time to time.

The Company may choose to undertake a multi-year project (an 'Ongoing Project') in fulfilment of its CSR obligations. Ongoing project means a multi-year project undertaken by the Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification. The period and treatment of such Ongoing Projects shall be as per the CSR Policy of the company and CSR Laws.

The Company has spent the CSR Obligated amount in part in the undertaken projects out of the above listed projects. During the financial year 2024–25, the Company has incurred an expenditure of Rs. 13,86,000/- towards the Rural Development Projects and Gender Equality and Empowerment projects and measures for reducing inequalities faced by socially and economically backward groups by reconstruction of homes for poor backward groups, against the total CSR obligation of Rs. 32,34,725/. Accordingly, an unspent amount of ₹18,48,725/-remained to be utilized towards CSR activities in the forthcoming years or as per the need of the people of Village in which the project was undertaken.

The Company could not utilize the remaining CSR amount during the year as the Gram Panchayat Committee was in discussions with the Company regarding the identification and prioritization of more critical projects required by the village, for which funds were to be deployed at a later stage. Consequently, the Company transferred the unspent CSR amount to an Unspent CSR Account, to be utilized in subsequent periods in accordance with applicable CSR requirements.

Further, the Company voluntarily transferred an additional amount of Rs. 51,275, thereby transferring a total sum of Rs. 19,00,000/- to the Unspent CSR Account. This additional amount was transferred with the intention of adjustment or set-off towards the implementation of the identified CSR projects.

##### **5. Annual Action Plan**

The Board at the beginning of every financial year shall formulate an annual action plan comprising of an amount to be spent during the said financial year, the CSR activities upon which the Company would focus during the said financial year including exploring new CSR projects and monitoring the implementation of ongoing CSR projects.

The annual action plan shall include the following, namely:

- (a) The list of CSR projects or programs 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 programs as specified in sub-rule (1) of Rule 4;
- (c) The modalities of utilization of funds and implementation schedules for the projects or programs;
- (d) Monitoring and reporting mechanism for the projects or programs and
- (e) Details of need and impact assessment, if any, for the projects undertaken by the Company

The Board may alter the annual action plan at any time during the financial year based on reasonable justification to that effect.

**6. CSR Committee**

The Board of Directors of the Company shall constitute a CSR Committee consisting of such number of members as may be required under the Companies Act, 2013. However, as per the provisions of the section 135 (9) of the Companies Act, 2013 and as per the FAQs on Corporate Social Responsibility issued by the Ministry of Corporate Affairs (MCA) dated 25<sup>th</sup> August, 2021, **where the amount required to be spent by a Company on CSR does not exceed fifty lakh rupees, the requirement for constitution of the CSR Committee is not mandatory and the functions of the CSR Committee, in such cases, shall be discharged by the Board of Directors of the Company, hence in our Company the function of CSR Committee discharged by the Board of Directors of Company .**

Further, subject to the provisions of the Act, the Board of Directors of the company may remove, appoint and re-appoint members of the CSR Committee/Board from time to time as they deem fit.

The Board /CSR Committee if applicable, shall meet as often as its members deem necessary to perform the duties and responsibilities.

**The Board will play the following role in fulfilling the Corporation's CSR objectives:**

- To formulate, approve and review of the CSR Policy of the Company;
- To decide on the amount of annual expenditure to be incurred on the CSR activities;
- To monitor the CSR policy of the Company from time to time;
- To formulate and review the annual action plan for each financial year;
- To disclose contents of such policy in its report and also place it on the Company's website, if any
- To ensure that the Company spends, in every financial year, at least two per cent of the average net profits of the company made during the three immediately preceding financial years
- Review certain CSR projects/programs as ongoing projects in accordance with the CSR Rules;
- Review the impact assessment **applicable if any** reports of CSR projects;
- Annually report and the status of the CSR activities and contributions made by the Company.
- if the Company fails to spend at least two per cent of the average net profits of the company, the Board shall, in its report made under (3) (o) of section 134, specify the reasons for not spending the amount and transfer the unspent CSR amount as per provisions of sections 135(5) and 135(6) of the Act

The Board shall do all such acts, deeds, matters and things to ensure compliance with applicable provisions relating to CSR and the CSR policy as amended from time to time. The overall execution of the policy and day-to-day administration will be the responsibility of the CSR team or such other officers as may be designated by the Board working under the guidance of the Board to ensure that the CSR initiatives are in line with this policy.

**7. Location Of CSR Efforts/Activities**

The Regulations provides that the corporates/ Company shall give preference to the local area and areas around where it operates, for spending the amount earmarked for CSR activities. The Company will thus give preference to conducting CSR activities in the states, where it has its operations. However, the Committee/Board may also identify such areas other than stated its operational place, as it may deem fit, and recommend

it to the Board for undertaking CSR activities.

The Company has proposed various Rural Development Projects, including reconstruction of homes for poor backward groups, the construction of a 20-lakh litre water tank in Zirad village, Taluka Alibaug, District Raigarh, Maharashtra, to provide safe drinking water to economically disadvantaged adivasi communities. In addition, the Company has proposed infrastructure development activities in the village, including road construction and related works such as site clearing, earthwork, subgrade preparation, drainage installation, base course construction, pavement construction, and maintenance thereof, with the objective of improving transportation facilities and overall infrastructure for the villagers.

**8. CSR Budget**

The total budget for the CSR projects will be decided annually in accordance with the goals and priorities of the Company. For the current financial year (FY 2023-24), the obligation amount for CSR was Rs. 32,34,725/-, however, during the year 2024-25, the Company has spent only Rs. 13,86,000 for the Rural Development Projects and other projects in which Company intends to spend with respect to the CSR. And hence, the Company is required to transfer or spend the remaining amount of Rs. 18,48,725/- towards the CSR unspent Account. However, the Company has transferred Rs. 19,00,000/- towards the same.

**9. CSR Expenditure**

The company shall endeavor to spend in every financial year, at least 2% of its average net profits made during the 3 immediately preceding financial years in pursuance of this CSR Policy and in the manner as specified in Section 135 of the Companies Act, 2013 and the Rules made thereunder from time to time.

**10. Supervision**

The Company's CSR activities will be driven by the Board or the person(s) identified by Board. The Board will play a significant role in ensuring that the CSR Policy is embedded across the Company's operations and CSR projects are in line with the policy.

The Board of Directors will satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or any Director will certify the same to that effect if required.

**11. Implementation**

The Company will undertake CSR projects which are closely linked with the principles of sustainable development and shared value with the involvement of local institutions and the community at large.

The designated person would assist in implementation and monitoring of the CSR projects/initiatives. The actual implementation of various initiatives will be broad-based with the involvement of various employees/units of the company or through implementing agencies.

The Board shall ensure that the CSR activities are undertaken by the company itself or through —

- (a) 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
- (b) A company established under section 8 of the Act or a registered trust or a registered society established by the Central Government or State Government; or

- (c) Any entity established under an Act of Parliament or a State legislature; or
- (d) 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 company may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that the CSR Committees of respective companies are in a position to report separately on such projects or programs in accordance with the CSR Laws.

**12. Disbursement**

The disbursal of funds will be either in tranches as per milestones agreed with the partner or one-time payment depending on the nature and requirement of the project. The terms, conditions and timing of disbursement will form part of the Memorandum of Understanding/ Grant Agreement with the entity implementing the project or any other documents as agreed and seems deem fit by the board.

**13. Monitoring**

The Board will ensure a transparent monitoring mechanism for ensuring effective implementation of the projects/ programs/activities proposed to be undertaken by the Company.

The designated person or directors would have the responsibility of monitoring approved projects and funds disbursals for such projects. Monitoring mechanism will include visits, meetings and progress/ status reporting by the project teams. The company's CSR activities will be reviewed by the Board. A system will be put in place to maintain a transparent monitoring and reporting mechanism across all the stakeholders involved in the CSR activities of the company as desired by the CSR Laws.

**14. Impact Assessment**

Impact assessment shall be conducted of the CSR projects in such manner as prescribed in CSR Laws, however as per Rule 8(3) of the Companies (CSR Policy) Rules, 2014 the Company (RFL) is not required to undertake the Impact assessment.

**15. Reporting /Disclosures**

Significant CSR activities and achievements will be reported as a part of the Director's Report in the Company's Annual Report as per the CSR Laws and also as per any other statutory and regulatory reporting requirements.

The Company shall disclose the composition of the CSR Committee, if applicable and CSR Policy and Projects approved by the Board on their website, if any, for public access.

**16. Review/Amendment**

The policy shall be reviewed annually or as per regulatory requirement.