



RICHACO EXPORTS PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY
POLICY

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1. INTRODUCTION OF THE COMPANY

Richaco Exports Private Limited (hereinafter referred as "**RICHACO**") incorporated on **10th November 2021, formerly known as Richa & Co (a partnership Firm)**).

Mr. Vijay Uppal, Managing Director of the Company, started his journey along with his brothers in 1977 and become one of the most preferred Apparel Manufacturers in India. As a responsible Manufacturer & Exporters, our Vision is to align our growth with development of people, the community & the environment.

We have been consciously developing our Corporate Social Responsibility initiatives that contribute to the sustainable development of society & the environment.

2. CONCEPT

Corporate Social Responsibility (CSR) has become the soul of every business as well as the password to overcome competition and ensure sustainable growth.

It is an effective tool that synergizes the efforts of Corporate and the social sector agencies towards sustainable growth and development of societal objectives at large.

CSR Policy of Richaco provides for the welfare measures for the community at large.

This Policy shall apply to all CSR initiatives and activities taken up at the various work centers and locations of the company for the benefit of different segments of the society.

3. SCOPE & APPLICABILITY

- i. The CSR Policy is formulated in accordance with the requirement of Section 135 of Companies Act, 2013 (hereinafter referred to as "**the Act**") and The Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time. This policy will be applicable to all the units/branches of **RICHACO EXPORTS PRIVATE LIMITED** in India.

- ii. The Policy lays down the criteria for identifying programs eligible for financial assistance and for determining the quantum of assistance in relation to such programs.
- iii. Any surplus arising out of CSR programs shall not form part of the business profits of the Company.
- iv. This Policy shall be called **"RICHACO CSR POLICY"**.

4. VISION & OBJECTIVES OF CSR POLICY

The vision for the Company for CSR initiatives is based on the list of activities mentioned in the Schedule VII of The Companies Act, 2013.

To promote activities that have high social impact in a manner which is aligned with the company's tradition of creating health & wealth in the community and create a framework to identify the beneficiaries, causes to work and appropriate projects.

To encourage employees at all levels to participate and increase commitment to give back to society.

To identify thrust areas for CSR that currently includes Contribution to Prime Minister National Relief Fund.

To utilize the resources of the Company and its people to give back to the society and affect positive changes in the lives of Indian Citizens.

The policy aims to create a unified approach to the CSR activities to ensure an increase in commitment levels across all levels in the organization and to give back to society in an organized manner.

5. BOARD OF DIRECTORS

At the apex level, the Board of Directors has the authority to approve the CSR Policy & Expenditures under various CSR initiatives while ensuring that the Company spent minimum 2% of the average net profit made during the three immediately preceding financial years.

Board of Directors ensures proper implementation & disclosure of all the CSR activities & expenditure in the Directors Report of the Company.

6. CSR COMMITTEE

The **Richaco's** Board of Directors has formed CSR Committee consisting of following members:

- | | | |
|----|---------------------|---------------------------------------|
| 1. | Mr. Raghav Uppal | Director |
| 2. | Mr. Karan Uppal | Director |
| 3. | Mr. Amardeep Dagar | General Manager (HR & Administration) |
| 4. | Mr. Navroop Phutela | D.G.M. (Accounts) |
| 5. | Mr. Jeewan Bose | Company Secretary |

The above Committee members would be responsible for the decision making with respect to **RICHACO CSR POLICY**.

7. IMPLEMENTATION

The CSR Committee of the Board shall meet at least twice a year to review the implementation of CSR projects/ programs and give suitable directions.

The CSR Committee shall recommend to the Board the projects/ programs to be undertaken, and the modalities of execution and implementation schedule of the said Projects/Programs from time to time. The Company will set up a CSR team to support the CSR Committee and implementation of the CSR activities.

The implementation of the initiatives will be done by the following modes.

- a) **Direct implementation** – CSR initiatives directly implemented by the company.
- b) **Indirect Implementation**- CSR initiatives implemented with the involvement of implementation agencies.

The implementation agencies may include:

- 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, established by the company, either singly or along with any other company, or

- 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
- 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.

Due diligence for the implementation agencies will be carried keeping the following points in consideration:

- Registration under section 12A and 80G of the Income Tax Act, 1961;
- A unique CSR registration number from the Ministry of Corporate Affairs, GOI;
- Utilization Certificate with the statement of expenditure duly certified by a Practicing Chartered Accountant to be submitted by the implementing agencies for the CSR fund provided to them.

The CSR team will set up a formal process of evaluation of the CSR activities under the guidance of the CSR Committee.

8. CSR FOCUS AREAS

The focus areas for the Company for CSR initiatives are based on the list of activities mentioned in the Schedule VII of the Companies Act, 2013,

Schedule VII activities are listed below:

- (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 vocational 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 widow;
- (vii) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.
- (viii) Contribution to the prime minister's national relief [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 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).

(x) Rural development projects.

(xi) Slum area development

Explanation- where '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.

9. CSR EXPENDITURE & ACTIVITIES

- i. Only those programs that are eligible in accordance with the Act and are consistent with the CSR themes identified by the CSR Committee shall be eligible for grants.
- ii. CSR Committee will recommend the program wise expenditure to the Board for its consideration and approval as per the provisions of the Companies Act, 2013.
- iii. The Board of the Company to ensure that minimum of 2% of average net profit of the last three financial year or where the Company has not completed the

period of three financial years since its incorporation, during such immediately preceding financial years, is to be spent on CSR initiatives undertaken by Richaco in pursuance of its Corporate Social Responsibility Policy.

- iv. All expenditure towards the programs to be diligently documented.
- v. In case at least 2% of average net profit of the last 3 years is not spent in the financial year, reasons for the same to be specified in Boards' Report.
- vi. Any surplus generated out of the CSR activities shall not be added to the normal business profits of Richaco.

10. MONITORING OF CSR INITIATIVES

Monitoring

Embedded in Richaco commitment to responsible business is the rigorous monitoring of all the CSR initiatives, and ensuring these initiatives have a positive impact on Society as a whole.

Our monitoring system will involve the following steps:

- Tracking of activities to understand if they are in line with project plans, timelines, and budgets
- Monitoring of reach and outcomes to assess whether the short-term goals of the Projects have been met.
- Collecting and analysing outcome data to understand how projects have benefited the target area or the beneficiaries.
- Periodic external evaluations on some initiatives, as required, to ensure the broader relevance of our activities and how to better design and implement them.

This information is collected through a variety of methods depending on the initiative, including site visits, Management Information System, reports, interviews, and case

studies, on an ongoing basis. Performance and impact data will be aggregated annually, along with the budget utilization, and will be published in the Board Report of the Company.

Reporting

The CSR Committee will prepare the annual CSR report and present for approval of the Board. This report will ensure that CSR programs are being properly documented and taken care of.

Modification

The Company reserves the right to modify, cancel, add, or amend any provision of this policy.

11. MISCELLANEOUS

I. Information Dissemination

As per Section 135(4) (a) of the Act, Richaco manner disclose contents of the CSR Policy on the Company's website, in such manner, as prescribed.

II. Partnerships

Collaborative partnerships may be formed with other NGOs and like-minded organizations. This helps widen the Company's reach and leverage upon the collective expertise, wisdom and experience that these partnerships bring to the table.

The Company may engage with well-established and recognized programs and national platforms in order to achieve the objective of inclusive growth.

By the Order of the Board

For Richaco Exports Private Limited

Sd/-

Vijay Uppal

(Managing Director)