

RAGHUKUL CONSTRUCTIONS PRIVATE
LIMITED

(CIN: U45202MH2009PTC197303)

CORPORATE SOCIAL RESPONSIBILITY POLICY

(REGD OFFICE: 188, AROHI APARTMENTS, BAJAJ NAGAR, NAGPUR,
MAHARASHTRA, INDIA, 440010)

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1. BACKGROUND

This is the Corporate Social Responsibility Policy (“CSR Policy”) for the **RAGHUKUL CONSTRUCTIONS PRIVATE LIMITED** as required under the Companies Act, 2013 (hereafter referred to as “the Act”), read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 and other directions and clarifications issued by the Ministry of Corporate Affairs from time to time (collectively referred to as the “CSR Regulations”).

This policy lays down broad approach and direction for selection, implementation and monitoring of CSR activities as well as formulation of the annual action plan pursuant to the CSR obligations in the sphere of corporate social responsibility undertaken by the Company.

The Board of Directors of the Company (“Board”) shall be responsible for implementing this Policy and shall ensure that the CSR activities are carried out in accordance with this Policy read with CSR Regulations.

2. OBJECTIVES AND SCOPE

- To ensure that the Company is committed to operate its business in an economically, socially and environmentally sustainable manner, while recognizing the interests of all its stakeholders.
- To take up programs that benefit the communities in and around its work centers and over a period of time, results in enhancing the quality of life of the people in the area of its business operations.
- Strive for economic development that positively impacts society at large with minimal resource footprint.
- Embrace responsibility for the Company’s actions and encourage a positive impact through its activities to alleviate hunger, poverty and malnutrition; to protect the environment; and to support communities, stakeholders and society.

- Establishing relationships of stability and equality with stakeholders related to the company, mainly shareholders, employees, providers, distributors, clients and society.
- Transmitting the company's social value in each territory, which reconciles the value of its operational activities with the value of the not-for-profit activities it carries out.
- Managing the risks and business opportunities arising from the development of the environment in which Company does business, assuming the impact it generates on society and the environment, maximizing the positives and minimizing the negatives.

3. ROLE OF BOARD OF DIRECTORS

Shri Dilip Raghunath Bharade, Shri Govind Vinayakrao Bharade, and Shri Maithili Dilip Bharade are the present directors of the company. Role of Board of Directors are as following:-

- To formulate and recommend a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013 (as amended from time to time).
- To recommend the amount of expenditure to be incurred on the activities in a Financial Year.
- To monitor the Corporate Social Responsibility Policy of the company from time to time.
- Any other matter / thing as may be considered expedient in furtherance of and to comply with the CSR Policy of the Company.

4. RESPONSIBILITIES OF THE BOARD

- Approve the CSR Policy
- Ensure implementation of the activities under CSR.
- Ensure expenditure of requisite amount on CSR every year as per law.
- Disclose reasons for not spending the amount (if applicable) in the Annual Report to the Shareholders of the Company.
- Ensure that the funds so disbursed have been utilized for the purposes and in the manner as approved by Board and shall certify to the effect.
- Approve transfer of unspent CSR Amount in accordance with the law.

5. AREAS OR SUBJECT SPECIFIED IN SCHEDULE VII OF THE COMPANIES ACT 2013

Pursuant to Schedule VII of the Companies Act, 2013, the Committee has approved the following activities as “CSR Activities” to be undertake under the CSR policy of the Company. The Board of Directors has reviewed the said activities and express its consent to the Committee to pursue the said activities under CSR policy of the Company under section 135 of the Companies Act, 2013, Schedule VII and other applicable rules, regulations, notifications etc., issued/to be issued from time to time.

Sr No.	CSR Activities
1.	Eradicating poverty, hunger and malnutrition, promoting health care which includes sanitation and preventive health care, contribution to the Swacch Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
2.	Promoting education which includes special education and employment strengthening vocation skills among children, women, elderly and the differently-abled and livelihood enhancement projects.

3. 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.
 4. Safeguarding environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining a quality of soil, air and water which also includes a contribution to Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
 5. 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.
 6. 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.
 7. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.
 8. Contribution to the Prime Minister's National Relief Fund, Contribution to the Prime Minister's National Relief Fund (PM-CARES) or any other fund set up by the Central Government for socio-economic development providing relief and welfare of the Scheduled Castes, the Scheduled and backward classes, minorities and women.
 9. Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government, State Government, Public Sector Undertaking or any agency of the Central Government or State Government.
 10. Contributions to public funded Universities, IITs, National Laboratories and autonomous bodies established under DAE, DBT, DST, Department of Pharmaceuticals, Ministry of AYUSH, Ministry of Electronics and Information Technology and other bodies, namely DRDO, ICAR, ICMR and CSIR, engaged in
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conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

11. Rural development projects.

12. Slum area development.

Explanation - 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.]

13. Disaster management, including relief, rehabilitation and reconstruction activities.

6. FOCUS AREAS

In accordance with the requirements under the Companies Act, 2013 and the rules/ regulations framed there under and circulars/ clarifications issued thereunder (collectively, "Applicable Law"), The Company shall undertake CSR Projects / Programs that are aligned with areas listed in Schedule VII of the Act, within the geographical limits of India, for the benefit of marginalized, disadvantaged and underserved sections of the community and the environment. The Board may

7. IMPLEMENTING CSR ACTIVITIES

Raghukul Constructions Private Limited shall undertake the CSR activities directly or through various implementing agencies such as, NGO's, non-profit organizations, etc. Such implementing agencies shall have an established track record as prescribed under the law. Raghukul Constructions Private Limited may collaborate with other companies for undertaking the CSR projects/programs subject to fulfilment of separate reporting requirements as prescribed in the Rules.

8. CRITERIA FOR IDENTIFYING EXECUTING PARTNERS

In case of programme execution by NGOs/Voluntary organizations the following minimum criteria should be required to be ensured:

1. The NGO / Agency must have a permanent office / address in India.
2. The NGO should be a registered public Trust or a Society having a duly executed Trust Deed / Memorandum of Association.
3. It should have registration Certificates under Section 12A, Section 80G, etc. of the Income Tax Act, 1961,
4. It should have a Permanent Account Number (PAN).
5. Last 3 years audited statement of accounts.
6. The executing partners must strictly follow the guidelines of MCA or any other Government authority / Regulatory bodies in this connection.

Provided that in case of any amendment in the Act / the Rules specifying any criteria for implementing agencies, the same shall be applicable in addition to the above criteria (to the extent applicable). Provided also that the Board may waive one or more of the above criteria on case to case basis.

9. CSR ANNUAL ACTION PLAN (CAAP)

The Board of Director shall formulate and recommend, a CAAP in pursuance of this Policy, which shall include focus areas for the year, the list of projects to be undertaken, manner of execution, fund utilization, monitoring mechanism, etc. The Board of Directors may approve the CAAP with such further conditions as it deems fit and further alter CAAP at any time during the financial year, as per the recommendation, based on the reasonable justification to that effect.

10. INFORMATION DISSEMINATION

1. Appropriate documentation of the CSR Policy, annual CSR activities and expenditure entailed will be undertaken on a regular basis.
2. CSR initiatives of the Company will also be reported in the Annual Report of the Company.

11. MONITORING AND REPORTING

Our aim is to evaluate the impact of its CSR programs through a standardized methodology and process. For an effective implementation of CSR activities and programs, an internal monitoring mechanism as developed by the CSR team will be put into effect. The internal monitoring mechanism shall ensure the following:

- i. Defined Process Owners for each process, program, and/or different levels within each program
- ii. Periodic reporting to leadership on the amount spent and activity undertaken
- iii. Impact measurement, including social upliftment and benefits to the community
- iv. Report consolidation and communication to the the Board
- v. Annual review of CSR programs by the duly constituted CSR Committee of the Board.

12. POLICY REVIEW

- The policy shall be subject to review as may be deemed necessary and in accordance with any regulatory amendments. Key managerial personnel may review the policy from time to time.

13. GENERAL

- Words and expressions used but not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, the CSR Rules made thereunder or in any amendment thereto. This Policy shall also be subject to such clarifications and FAQs as may be issued by MCA from time to time.
- In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein the interpretation & decision of the CSR Committee/Board shall be final.
- Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from the Government, from time to time.