

REGENCY NIRMAN LIMITED

Registered Office: - REGENCY HOUSE, PLOT NO.49, SHEET NO.1, OPP. VISHNU
DARSHAN, AMAN TALKIES ROAD ULHASNAGAR 421003.

POLICY FOR CORPORATE SOCIAL RESPONSIBILITY ("CSR")

REGENCY NIRMAN LIMITED

CORPORATE SOCIAL RESPONSIBILITY (“CSR”) POLICY

This Corporate Social Responsibility Policy (“the CSR Policy”) has been framed by **Regency Nirman Limited** (the Company) in accordance with the Section 135, Schedule VII of the Companies Act, 2013 and CSR Rules issued by the Ministry of Corporate Affairs on February 27, 2014 and 22nd January, 2021.

Unless the context otherwise requires, the definitions mentioned in the notification dated February 27, 2014 and 22nd January, 2021 and Companies Act 2013, shall apply to this CSR Policy.

DEFINITIONS:

1. Administrative overheads:

Administrative overheads means the expenses incurred by the company for ‘general management and administration’ of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme.

2. Corporate Social Responsibility (CSR):

Corporate Social Responsibility (CSR) means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in these rules, but shall not include the following, namely:-

(i) activities undertaken in pursuance of normal course of business of the company: Provided that any company engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that-

(a) such research and development activities shall be carried out in collaboration with any of the institutes or organisations mentioned in item (ix) of Schedule VII to the Act;

(b) details of such activity shall be disclosed separately in the Annual report on CSR included in the Board’s Report;

(ii) any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;

(iii) contribution of any amount directly or indirectly to any political party under section 182 of the Act;

(iv) activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);

(v) activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;

REGENCY NIRMAN LIMITED
Policy For Corporate Social Responsibility (“CSR”)

(vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India

3. CSR Policy:

CSR Policy means a statement containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan

4. International Organisation:

International Organisation means an organisation notified by the Central Government as an international organisation under section 3 of the United Nations (Privileges and Immunities) Act, 1947 (46 of 1947), to which the provisions of the Schedule to the said Act apply.

5. Ongoing Project:

Ongoing Project means a multi-year project undertaken by a 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.

COMPANY PHILOSOPHY FOR CSR POLICY:

Companies Act, 2013 has formally introduced the Corporate Social Responsibility to the dash board of the Indian Companies. Regency Nirman Limited is much positive and appreciate the decision taken by the Government of India. Legal framework of CSR is an edge to Corporate Charitable/reformative approach towards the Society to which the Corporate is belonging to. By introducing the separate section for CSR in Companies Act, 2013, the Government has given legal recognition to their community development approach.

The management of the Regency Nirman Limited expresses its willingness and support to the CSR concept, its legal framework and shall be abided to it.

At Regency Nirman Limited, the Corporate Social Responsibility (CSR) has been an integral part of the way we have been doing our business since inception. From many years, the Company's CSR initiatives has played pivotal role in improving the lives of the communities and society at large and in & around our operations with an objective to energize, involve and enable them to realise their potential. This has also enabled us to fulfil our commitment to be a socially responsible corporate citizen.

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE:

The Company has constituted Corporate Social Responsibility Committee (“the Committee”) comprising of following four Directors out of which two Director is an Independent Director:

- | | | |
|----|--------------------|------------------------------------|
| 1. | Mr. Manoj Lalpuria | Non-Executive Independent Director |
| 2. | Mr. Niraj Sharma | Non-Executive Independent Director |

REGENCY NIRMAN LIMITED
Policy For Corporate Social Responsibility (“CSR”)

3. Mr. Ramkishore S. Khairari Executive Director
4. Mr. Mahesh S. Khairari Executive Director

Board of Directors of the Company may re-constitute the Committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The members of the Committee shall be appointed by the Board. A member of the Committee may be removed, with or without cause, by a majority vote of the Board.

The Committee shall exercise powers and perform the functions assigned to it by the Board of Directors of the Company pursuant to section 135 of the Companies Act, 2013 and CSR Rules notified with regard thereto.

CSR ACTIVITIES:

Pursuant to Schedule VII of the Companies Act, 2013, the Committee has approved the following activities as “CSR Activities” to be undertaken under the CSR policy of the Company. The Board of Directors has reviewed the said activities and expressed its consent to the Committee to pursue the said activities under CSR policy of the Company under section 135 of the Companies Act, 2014, Schedule VII and other applicable rules, regulations, notifications etc., issued/to be issued from time to time.

APPROVED CSR ACTIVITIES:-

Activities which may be included by the company in their Corporate Social Responsibility Policies Activities relating to:—

(i) Eradicating hunger, poverty and malnutrition, [“promoting health care including preventive health care”] and sanitation [including contribution to the Swachh 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, 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;

REGENCY NIRMAN LIMITED
Policy For Corporate Social Responsibility (“CSR”)

- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (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 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) Contributions or funds provided to technology incubators located within academic institutions which are approved by the central govt.
- (x) Rural development projects
- (xi) Slum area development.
- (xii) Disaster management, including relief, rehabilitation and reconstruction activities.

OBJECTIVES OF COMPANIES TOWARDS CSR

The main objective of Regency Nirman Limited’s CSR policy is

- To lay down guidelines to make CSR a key business process for sustainable development of the society.
- To directly/indirectly undertake projects/programs which will enhance the quality of life and economic well-being of the communities in and around our plant and society at large.
- To generate goodwill and recognition among all stake holders of the company.

OUR RESPONSIBILITIES TOWARDS CSR

A) Towards our communities

We will involve communities surrounding our operations to bring about a positive change in their lives through holistic, sustainable and integrated development.

B) Towards our Customers

We will build gainful partnerships with the customers to understand their needs and provide right product and service solutions. We will adopt and actively encourage the best and fair business practices and shall endeavour to build solid bonds with them.

C) Towards our Business Partners

We will support our suppliers to cultivate ethical and fair business practices and give preference over other to those who demonstrate this.

D) As a Corporate Citizen

We reaffirm our commitment to conduct our business with environmental accountability. We will endeavour to adopt environment-friendly technologies and energy efficiency in our operations while continuously monitoring and reducing emissions.

E) Responsibilities toward our Employees

We will foster a work culture with high ethical principles and standards and encourage our employees to perform with total integrity, commitment and ownership. We will do all we can to support their professional growth and recognise high achievers.

REGENCY NIRMAN LIMITED
Policy For Corporate Social Responsibility ("CSR")

We recognise that our employees and contractors deserve to work in safe and healthy work environment and will make it our responsibility to ensure zero harm to people.

CSR MAINSTAY

CSR activities at Regency Nirman Limited shall be carried out through:

1. Direct Activity for needy persons
2. Collaboration with other Companies undertaking projects/programs in CSR activities.
3. Contribution / donation made to such other Organization / Institutions as may be permitted under the applicable laws from time to time.
4. Contribution / donation made to such other Organization / Institutions who are Registered under section 8 Company or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961 and also having CSR Registration Number by filing Form CSR-1 on 1 April, 2021 from time to time.
4. Directly by the Company for fulfilling its responsibilities towards various stakeholders.
5. Any other eligible trust

EXCLUSION FROM CSR

The following activity shall not form part of the CSR activities of the Company:-

1. The activities undertaken in pursuance of normal course of business of a company.
2. CSR projects/programs or activities that benefit only the employees of the Company and their families.
3. Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
4. Any CSR projects/programs or activities undertaken outside India.

IMPLEMENTATION

(1) 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.

(2) (a) Every entity, covered under sub-rule (1), who intends to undertake any CSR activity, shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar, with effect from the 01st day of April 2021:

Provided that the provisions of this sub-rule shall not affect the CSR projects or programmes approved prior to the 01st day of April 2021.

REGENCY NIRMAN LIMITED
Policy For Corporate Social Responsibility (“CSR”)

(b) Form CSR-1 shall be signed and submitted electronically by the entity and shall be verified digitally by a Chartered Accountant in practice or a Company Secretary in practice or a Cost Accountant in practice.

(c) On the submission of the Form CSR-1 on the portal, a unique CSR Registration Number shall be generated by the system automatically.

(3) A company may engage international organisations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR policy as well as for capacity building of their own personnel for CSR.

(4) A company may also collaborate with other companies for undertaking projects or programmes 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 programmes in accordance with these rules.

(5) The Board of a company shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

(6) In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

MONITORING & REPORTING

The CSR Committee will be responsible for the monitoring CSR activities and report to the Board as per The Companies (Corporate Social Responsibility Policy) Rules, 2014 or The Companies (Corporate Social Responsibility Policy) Amendment Rules, 2020 or The Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021. The CSR Committee has the powers to:

1. Seek monitoring and implementation report from the Organisations receiving funds.
2. Delegate a designated company official to co-ordinate with the Organisation receiving funds to inspect the activities undertaken and ensure information in a timely manner.

The following processes will be followed:

(a) Activities and Budget

The activities and budgets for CSR will be presented in detail to the Board of Directors of Regency Nirman Limited.

Additionally, the Committee may empower to spend such amount as they think appropriate for some other strategic CSR contingencies that may arise during any financial year. The amount spent as above shall be put up for ratification of the Committee at its next meeting and shall report to the Board accordingly.

(b) Continuous Monitoring

The Committee Members will receive in a prescribed format, a quarterly report of CSR spend;

A presentation on the progress of the CSR projects / activities will be made to the Committee by the CSR Executives at the Committee meetings held from time to time;

REGENCY NIRMAN LIMITED
Policy For Corporate Social Responsibility (“CSR”)

DISPLAY OF CSR ACTIVITIES ON ITS WEBSITE:

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

TRANSFER OF UNSPENT CSR AMOUNT:

Until a fund is specified in Schedule VII for the purposes of subsection (5) and(6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act.

DISCLOSURES

The Annual Report of the Company include a section on CSR outlining the CSR Policy, CSR committee, CSR initiatives undertaken by Company, the CSR spend during the financial year and other information as required by the prevailing law.

REVIEW OF CSR COMMITTEE CHARTER/POLICY

The adequacy of this Policy shall be reviewed and reassessed by the Corporate Social Responsibility (“CSR”) Committee as may be deem fit by the Committee and appropriate recommendations shall be made to the Board to update the same based on the changes that may be brought about to the regulatory framework, from time to time.

AMENDMENTS

This Policy shall be suitably amended, modified and improved to meet the changing business needs and in respect to any subsequent amendment/modification in the companies act and/or other applicable laws in this regard.

Amendment: - 06/04/2021