



RAM RATNA WIRES LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

(Amended as on 7th November, 2023)

A. Philosophy

Ram Ratna Wires Limited is dedicated to operate and develop its business in a socially responsible way with a vision to be an environmental friendly corporate citizen. As a responsible corporate citizen, we attempt to contribute for social and environment causes. Ram Ratna Wires Limited's CSR policy is embedded with the Company's core values of quality, reliability and trust guided by high standards and best practices and driven by our aspiration for excellence in the overall performance of our business.

B. Vision

CSR is deeply rooted in our core values. Company's projects or programs focus on promoting education, special education and employment enhancing vocational skills especially among children, women, elderly and the differently abled, livelihood enhancement projects, clean environment, promoting sports, eradicating hunger, poverty and malnutrition etc. It has been our constant endeavour to bring about a positive difference to communities where we exist.

C. Constitution and Functions of CSR Committee

Keeping in line with Section 135 of the Companies Act, 2013 and the Rules made there under, Board of Directors of the Company at its meeting held on 29th July, 2014 has constituted a CSR Committee. The CSR Committee shall be comprised in accordance with the requirements of the Companies Act, 2013 and Rules made there under as amended from time to time. The Members of the CSR Committee shall be appointed by the Board of Directors of the Company.

The CSR Committee to, inter alia, carry out the following functions;

- a. To formulate and recommend to the Board, 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 and the rules made there under.
- b. To recommend the amount of expenditure to be incurred on the CSR activities.
- c. To monitor the implementation of framework of CSR Policy.
- d. To carry out any other function as mandated by the Board from time to time and / or enforced by any statutory notification, amendment or modification, as may be applicable, necessary or appropriate for performance of its duties.
- e. To identify the strategies for monitoring and evaluation of CSR initiatives and to facilitate adequate feedback to the Board with regard to the efficiency of CSR expenditure and quality of compliance of the provisions of CSR under Companies Act, 2013 and rules there under.
- f. To ensure that the funds so disbursed have been utilised for the purposes and in the manner as recommended by the Committee and approved by the Board of Directors.
- g. To formulate and recommend to the Board, an annual action plan in pursuance of the Company's CSR Policy providing for the list of CSR projects and programmes that are approved to be undertaken, the manner of execution and the modalities of utilisation of funds and implementation schedules for the projects or programmes, monitoring and reporting mechanism and details of need and impact assessment, if any, for the projects undertaken by the Company.

D. Areas of functioning

In accordance with the primary CSR philosophy and vision of the Company and the activities specified under Schedule VII of the Companies Act, 2013 and the rules made thereunder and any amendments thereof, the CSR activities of the Company would include the following:

- (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 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 widows;
- (vii) Training to promote rural sports, nationally recognised 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 govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- (ix) Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Biotechnology (DBT), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) 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.- 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 CSR areas highlighted in this policy shall be monitored and reviewed by the Management, CSR Committee and the Board of Directors (Board) from time to time. All CSR Initiatives/projects/programs/activities are and will continue to fall under the purview of schedule VII of the Act. The CSR Committee may include any other areas falling within the Schedule VII of the Act (and amendments thereto) from time to time. The CSR initiatives as stated aforesaid will be ongoing initiatives of the Company and are proposed to be implemented on a continuous basis subject to review and monitoring by the CSR Committee and Board.

E. Implementation

The Company's CSR initiatives to be implemented directly or through a registered Trust or a registered Society or a company established by the Company or its holding or its subsidiary or associate company under Section 8 of the Act. However, such trust, society or company, if not established by the Company or its holding company or subsidiary company or associate company, shall have an established track record of at least 3 years in undertaking such programmes or projects. Such Trust or a registered society or Company established under Section 8 of the Act shall be registered with the Central Government by filing Form CSR-1 electronically with the registrar as per the rules notified by the Government and below points to be taken in consideration for implementation of CSR project/activity:

a. The CSR projects or programs or activities will be undertaken in India only except for training of Indian sports personnel representing any State or Union territory at national level or India at international level.

b. The Company may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that it is in a position to report separately on such activities in accordance with the rules.

c. The CSR projects or programs or activities that benefit only the employees of the company and their families shall not be considered as CSR activities.

d. Activities undertaken in pursuance of normal course of business of the Company shall not be considered as CSR activities.

e. Companies may build CSR capacities of their own personnel as well as those of their implementing agencies through Institutions with established track records of at least three financial years but such expenditure including expenditure on administrative overheads, shall not exceed five percent of total CSR expenditure of the company in one financial year.

f. The Company shall not contribute any amount directly or indirectly to any political party.

g. Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services; and activities carried out for fulfilment of any other statutory obligations under any law in force in India shall not be considered as CSR activities.

F. CSR Budget

The Company shall spend, in every Financial Year, at least 2% of the average net profits of the company made during the three immediately preceding financial years, on the CSR activities. In case the Company spends an amount in excess of aforesaid 2% then the Company may set off such excess amount in accordance with provisions of the Companies Act, 2013 read with Rules made thereunder.

G. Monitoring Mechanism

The CSR Committee shall institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the company. The CSR Committee of the Company will analyze the implementation of CSR activities at various areas and report to the Board and based on the report placed before the Board, the Chief Financial Officer of the Company shall confirm to the Board of Directors of the Company that the fund disbursed have been utilised for the purpose and in the manner as recommended by the CSR Committee and approved by the Board of Directors, on a yearly basis by way of certificate. The CSR Committee shall meet at least once in a year to monitor the implementation of CSR projects or programs. The Company Secretary of the Company shall assist the CSR Committee and the Board for performing their respective duties under the CSR Policy, any changes by the Government in the regulations governing the CSR activities.

H. Surplus of CSR Projects

The surplus, if any, during any year arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company and will be ploughed back into the CSR activities.

I. Disclosures

The Committee shall ensure that the CSR Policy, as amended from time to time and CSR Projects as approved by the Board are displayed on the company's website. The CSR Committee shall place before the Board, a draft report on CSR activities in a board meeting every financial year for Board's review and finalization. The Board shall include in its report to the shareholders, the annual report on CSR activities as per the format specified under the Rules.

J. Amendments

Any or all the provisions of this CSR policy would be subject to revision / amendment by the Board of Directors of the Company based on the recommendations of the CSR committee in accordance with the guidance on the subject issued by the government authorities from time to time.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail notwithstanding the provisions hereunder from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.