



RADIANCE REALTY DEVELOPERS INDIA LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY, 2021

Amended and approved by the Board w.e.f. 8th February 2021,

*[pursuant to Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021
effective 22nd January 2021]*

For RADIANCE REALTY DEVELOPERS INDIA LTD.

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Managing Director

INTRODUCTION

- 1.1 The new Companies Act 2013 (Act), has mandated Corporate Social Responsibilities (CSR) in respect of certain companies to constitute Corporate Social Responsibility Committee to effectively monitor CSR activities of the Company. Further the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as "CSR Rules") lays down the framework and modalities of carrying out CSR activities which are specified in the Act.
- 1.2 As a leader in the Real Estate Industry, we "Radiance Realty Developers India Limited (hereinafter "the Company") are very keen in the protection of the environment and the communities in which we live in. The Company maintains high standards of safety, health and environmental care at all its operating locations, without losing sight of its long term goal of zero occupational injuries, operational incidents and environmental releases.
- 1.3 The CSR Policy of the Company outlines a broad framework, and extends discretion to the Board or its Committee to determine coverage of areas within the territory of India, and preferably the geographical area in and around where the Company is located and other terms.
- 1.4 All the proposals for expenditures of the Company falling under the areas qualifying for CSR shall be placed before the CSR Committee and shall be subject to supervision and directions of the Committee.

Objective of the CSR Policy

- 2.1 The main objective of the CSR Policy is to lay down guidelines for the Company to make CSR as one of the key focus areas so as to make a contribution to the society. The CSR Policy covers the entire CSR activities to be undertaken by the Company in alignment with the Company's policy and read with the Act as amended from time to time, in respect of the CSR activities to be carried out in India. The Company proposes to implement its CSR activities in the following areas, which list is not limited or exhaustive, but inclusive:
 - a) Healthcare
 - b) Promoting rural sports and nationally recognised sports
 - c) Provision of Sanitation facilities
 - d) Providing Drinking Water
 - e) Education including construction of schools/upgrading facilities for schools etc.
 - f) Rural Development - providing infrastructure in and around the villages surrounding the Plant
 - g) Extending Medical facilities to the local community
 - h) Environment Protection
 - i) Libraries for the local community
 - j) Providing funds to the local hospital for improving its infrastructure
 - k) Any other activities, as may be approved by the Committee, as per the Act.
- 2.2 The Corporate Social Responsibility programmes of the Company will broadly cover the areas of Education, Health Care and Social Empowerment. Additionally, the projects falling under any of the following areas may also be considered by the Company:
 - a) Eradicating hunger, poverty and malnutrition, promoting 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.

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- b) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- c) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up of 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.
- d) 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.
- e) Protection of national heritage, art, handicraft 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.
- f) 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.
- g) Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports.
- h) Contribution to the Prime Minister's National Relief Fund, or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund), and any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, Scheduled Tribes, other backward classes, minorities and women.
- i) 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.
- k) 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 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).
- l) Rural development projects.
- m) Slum area development.
- n) Disaster management, including relief, rehabilitation and reconstruction activities.
- o) Formation of Registered Clubs/Institutions which promote Sports activities, based on the following objectives:
 - To work for development of the Sport in and around of state of Tamil Nadu or all over India and encourage upcoming players by providing necessary infrastructure and facilities.
 - To arrange matches and training for each of the playing members of the Club and to undertake such activities as are necessary or desirable in support of that object.
 - The Club is committed to encouraging the highest ethical standards. All individuals involved in the Club should conduct themselves with integrity, transparency, accountability and in a fair and equitable manner.
 - To help the players who are economically and socially backward in the society, by providing necessary sports material, nutritious food, clothes and other facilities.
 - To assist in building, construction, re-construction, repairs, renovation of the Sports grounds, stadiums.

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- To do, promote or sponsor all activities which are necessary or helpful for promotion of the game or Sport and the players.

2.3 The Board of Directors of the Company (hereinafter referred to as "the Board") and the CSR Committee are empowered in terms of the Policy, to laydown the CSR programs for the Company to follow, and to designate the annual plan of action to achieve the same.

Composition of CSR Committee

The Board shall constitute a Committee in the name and style of "Corporate Social Responsibility Committee" (hereinafter referred to as the "CSR Committee") which shall consist of at least Three (3) or more Directors, out of which at least one Director at any time shall be an Independent Director, if there is one on the Board.

The Board shall have discretion in appointing or removing members of the Committee. The Board is free to determine sitting fees for attending the meeting by the members.

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.

In absence of the CSR Committee, the responsibilities and duties of the CSR Committee, shall be discharged by the Board of Directors of the Company.

Proceedings of the CSR Committee

The Committee shall meet as and when the Chairman calls for a meeting. Any one of the members of the Committee may, at the request of the Chairman, also call for a meeting.

Quorum for a meeting of the Committee shall be any two members present, in the meeting personally or over video conference.

Identification / selection of activities/projects

Out of the approved CSR activities, the Committee shall decide which activity/project should be given priority for the respective financial year. While arriving at the decision of the activity to be undertaken for the respective year, the Committee shall analyse the basic need of the community/ area in which the Organisation operates or at the place where its registered office is situated. The Committee shall accordingly prioritise the CSR activities.

Implementation

After prioritizing the activity, the Committee shall finalise the detailed implementation for the project/programme, including planning for expenses against the total budget allocated for CSR activities.

A specific budget would be recommended by the Committee from time to time for eligible CSR activities subject to approval of the Board. The budget may be project driven or otherwise.

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Managing Director

Contents of the policy should be disclosed on the Company's website, if any, and also in the Board's Report.

CSR Expenditure

CSR expenditure will include all expenditure incurred by the Company on CSR Programmes undertaken in accordance with the approval of the Board. Moreover, any surplus arising from any CSR Programmes shall be used for CSR and shall not form part of the business profits of the Company. Accordingly, any income arising from CSR Programmes will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.

The Committee shall be free to adopt the modus operandi for CSR spends of the Company.

Organisational Responsibility

At organisational level for implementation of agreed CSR activity, the Committee may constitute an implementation team or authorise any of the Department(s) of the Company to organize for the implementation of the CSR activity. The team or respective department shall monitor the implementation process from time to time, on behalf of the CSR committee and place a report to the Committee regarding the progress of the activity implementation. The respective department or implementation team would be responsible for reporting of any irregularity to the Committee, on an immediate basis.

Monitoring by the Board:

The Board of Directors shall constantly monitor the implementation of the CSR activities. The CSR Committee shall place a progress report, including details of expenses, before the Board for their review. The Board may suggest recommendation(s), if any, to the Committee with regard to the implementation process.

Compliance and Reporting to Board

The Committee is responsible to undertake CSR activities as per the approved CSR Policy. Apart from reporting to the Board about the implementation of CSR activities, a detailed Report containing the implementation schedule, total budget allocated, actual expenses incurred, surplus arising, if any, result achieved, further work to be done, recommendation for the CSR activities for next year etc., should be placed before the Board for its consideration. Any surplus arising out of the funds allocated for CSR activity, shall not be part of the business profit of the Company.

Interpretation

In case of any conflict between the provisions of this Policy and the Statutory provisions, the Statutory provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory provisions shall automatically become applicable to this Policy.

Review

This CSR Policy can be modified/reviewed by the Board directly, or on the recommendation of the CSR Committee from time to time.

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Management Commitment

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

Our Corporate Social Responsibility policy conforms to the relevant section of the Corporate Social Responsibility, Rules made under Companies Act, 2013 and amendment(s) to be made thereto in future.

For RADIANCE REALTY DEVELOPERS INDIA LTD.

Managing Director

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