



**REDINGTON LIMITED**  
**POLICY ON CORPORATE SOCIAL RESPONSIBILITY**

Policy approved by	:	Board of Directors of Redington Limited
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## **Redington's approach to CSR**

### ***"Create Value, Profit will follow"***

Every organization has the right to exist in a society. Associated with the right, is the duty to build both social and environmental capital that transcends business interests and helps build a better and more sustainable way of life for the less privileged members of our community.

Redington India Limited's (hereinafter referred to as the Company) business guiding principle is "Create Value and the Profits will follow". It believes that creation and maximization of value to the 'expanded stakeholders' is paramount, ensuring that growth can be both inclusive and equitable. The Company is committed to improving the quality of life of the underprivileged and disadvantaged sections of the local community as well as society at large.

### **Object of the Policy**

This policy on Corporate Social Responsibility (hereby referred to as the CSR Policy) has been developed with an aim to lay down approach and direction including guiding principles for the Company to select, implement and monitor various Corporate Social Responsibility (CSR) initiatives and activities that ensures sustainable development of the community within which it exists, and also for formulation of annual action plans.

### **Applicability**

The CSR policy has been developed in consonance with Section 135 of the Companies Act, 2013 (referred to as the Act in this policy) on CSR read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereby referred to as the Rules) notified by the Ministry of Corporate Affairs, Government of India. Further this Policy is revised to conform with the amendments in the Act and the Rules.

The Policy shall apply to all CSR initiatives and activities undertaken by the Company in India as per Schedule VII of the Act.

## **Governance**

Overall governance of CSR activities and approving of the CSR Policy will be the responsibility of the Board of Directors, basisthe recommendations of Corporate Social Responsibility Committee (CSR Committee).

- The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy consisting of:
  - A. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
  - B. the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
  - C. the modalities of utilisation of funds and implementation schedules for the projects or programmes;
  - D. monitoring and reporting mechanism for the projects or programmes; and
  - E. details of need and impact assessment, if any, for the projects undertaken by the company
- The Board shall approve the Annual Action Plan considering the recommendation of the CSR Committee.
- The Board, on the recommendation of the CSR Committee, shall update, alter, modify, amend, withdraw and replace the Annual Action Plan for justified reasons.
- The Board shall ensure proper implementation of the CSR Policy along with monitoring and reviewing CSR Activities undertaken by the Company and provide inputs as and when required.
- The Board shall satisfy itself that the CSR funds disbursed are alignment to the CSR Policy of the Company and have been utilized for the purposes and in the manner approved by it. The Chief Financial Officer or the person responsible for financial management shall certify the same to the effect.
- The Board shall also ensure appropriate disclosures pursuant to the Act and Amendments thereof in the Annual Reports and in the Company's website in the prescribed formats.

## **CSR Committee**

The Board of Directors of the Company has formed a Corporate Social Responsibility Committee. The Committee, as mandated under Section 135 (3) of the Companies Act, 2013, shall carry out such functions as approved by the Board.

## **CSR activities**

The Company shall upon the recommendation of its CSR Committee and with necessary approval of the Board, can undertake any activities which are defined in Schedule VII of the Companies Act 2013 as part of its corporate social responsibility initiatives and activities.

## **Focus Areas**

**Education: Category: Companies Act, 2013 – Schedule VII (ii) - Promoting Education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects**

- To bridge the digital divide between the 'haves' and 'have not's in educational infrastructure and facilities, by donating High end Lab equipment, Projector, Laptop, etc.
- To teach moral education through technical means
- To eradicate poverty as a hindrance for education, by providing free education and donation of books to Public Libraries
- To hone the Employability skills through organizing for skill development Programmes and employee motivation programmes

**Health: Category: Companies Act, 2013 – Schedule VII (i) - Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare and sanitation**

- To provide health care facilities at remote places
- To enhance the health care facilities in existing hospitals
- To encourage Employees to advocate the benefits of organ donation and its positive impact on the society as the whole
- To organize and participate in blood donation campaigns every year across its divisions and offices through tie – up with hospitals.
- To conduct events and expos to make awareness of Health care.

**Environment: Category: Companies Act, 2013 – Schedule VII (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**

- To advocate usage of alternate energy and promote energy saving initiatives, by installing solar Panels and replacing existing electronic appliances with energy efficient ones.
- To preserve and conserve water bodies and to improve water table by promoting rain

water harvesting and cleaning of river, ponds, lakes, streams

**Women empowerment and Category: Companies Act, 2013 – Schedule VII (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**

- To conduct programmes which promote gender equality and empowering women
- To set up old age homes, day care centres and other facilities for senior citizen
- To undertake initiatives for reducing inequalities faced by socially and economically backward groups

**Art & Culture: Category: Companies Act, 2013 – Schedule VII (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 arts and handicrafts**

- To conduct yoga classes for the diseased patients for mental relief
- To conduct classic dance and music classes for the students from rural areas
- To donate to institutions promoting art and culture
- To conduct drawing and painting classes for destitute children

**Contribution to any fund/institution/ any other organization as provided under Schedule VII of Act**

### **Resources & Allocation of Funds**

- Every year, the Company is required to spend atleast 2% of its average Net profit as defined under the Rules (“CSR obligation”) during the three immediately preceding financial years, on the CSR Activities. The Annual Action plan containing the budget fulfilling CSR obligation, as recommended by the CSR committee, will be approved by the Board.
- The administrative overheads shall not exceed five percent (5%) of the total CSR expenditure of the Bank for the financial year. 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.

- Any amount remaining unspent at the end of the financial year, if any, except in case of an ongoing project, shall be transferred to a Fund to be specified in Schedule VII for this purpose, within a period of six months of the expiry of the relevant financial year.
- In case the Company undertakes any ongoing project, any amount remaining unspent and earmarked for the ongoing project, shall be transferred within a period of thirty days from the end of the financial year to a special account to be opened for that financial year in any scheduled bank to be called the 'Unspent Corporate Social Responsibility Account', and such amount shall be spent within a period of three financial years from the date of such transfer, failing which, the unspent amount shall be transferred to the Fund to specified in Schedule VII for this purpose, within a period of thirty days from the date of completion of the third financial year.
- Any surplus arising out of CSR projects, programmes or activities shall not form part of the business profits of the Company and shall be utilized in accordance with Act and CSR rules.
- In case, the Company spends an amount in excess of requirement of its CSR obligations in a financial year, such excess amount may be set off against the requirement of CSR spending up to immediate succeeding three financial years subject to fulfilment of conditions specified under CSR rules
- The Company may spend its CSR obligation for creation or acquisition of a capital asset subject to fulfilment of conditions specified under CSR rules.

**Guideline for selection of CSR Projects / programmes and for formulation of Annual Action Plan**

Corporate Social Responsibility 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;
- vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India;

#### **Guideline for Implementation of CSR projects / programmes**

1. The CSR activities may be undertaken by the Company directly or through "Implementation Agency" being duly registered with the Central Government and having a unique CSR Registration Number (with effect from April 1, 2021):
  - 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. The Company can implement the recommended CSR projects in partnership / collaboration with its Indian Subsidiaries. It can also collaborate with other corporate organisations/companies for undertaking CSR projects, programs or activities in such a manner that the CSR Committees of respective companies are in a position to report separately on such projects or programs or activities.

3. The Company will encourage and recognize its employees for volunteering with the spirit of serving and sharing with the community. The Company shall endeavor to increase employee participation at all levels in the Organization, by encouraging employees to participate in the Company's CSR activities.
4. The Company shall ensure that all the CSR Activities are implemented as per the approved Annual Action Plan, authorised by the Board.

#### **Guideline for monitoring of CSR projects / programmes**

Monitoring and evaluation is an essential part of any CSR initiative, which help businesses in enhancing their CSR programs.

1. The CSR Committee will ensure a monitoring mechanism for ensuring effective implementation of the projects / programs/ activities proposed to be undertaken by the Company using appropriate monitoring tools that may include one or more of the third-party audit(s) or certification(s), impact assessment(s), self-assessment report(s), field visit(s), periodical review(s) or any other appropriate mechanism.
2. The CSR Committee shall review the Budget allocation, Expenditure incurred, fund disbursed, implementation of projects per approved timelines, utilization statement for one-time and ongoing projects from time to time.
3. In the event any of the CSR Activities are undertaken through an Implementing Agency, the CSR Committee to ensure that Implementing agency shall devise a robust monitoring mechanism to ensure that the CSR Activities are undertaken effectively in accordance with approved Annual Action Plans in compliance with the Act, CSR rules and the provisions of this Policy.
4. The CSR Committee, shall after review, provide such inputs or recommendations, as it may deem necessary, to the Board. Notwithstanding anything to the contrary, the Board shall not be obliged to comply with the recommendations of the CSR Committee.
5. The Board shall review the status of implementation and fund utilization of the various projects and programmes as per approved Annual Action Plan.
6. In case of ongoing project, as defined under the Act and CSR Rules, the Board 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.
7. The Company shall undertake impact assessment for CSR projects / programmes, as recommended by the CSR Committee. The Company shall also undertake impact assessments for CSR projects / programmes having outlays of one crore rupees or more, in compliance CSR rules and other conditions prescribed therein, based on applicability.

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