RABARA INDIA PRIVATE LIMITED

POLICY ON
CORPORATE SOCIAL RESPONSIBILITY

RABARA INDIA PRIVATE LIMITED

CIN: U13999GJ2026PTC183103

1. Preamble

RABARA INDIA PRIVATE LIMITED (“Company”), understands its responsibility towards the society and the same is reflected by activities initiated and undertaken by it. The CSR programme of Company will cover not only the person associated with it but it also extends to society at large and more particularly to the persons residing in local areas. The business vision and mission of company well reflects its belief for betterment of society through empowerment, creating value and welfare activities. The company will come forward with best of its efforts to help the society in the time of natural calamities like earthquake, tsunami, etc.

2. CSR Committee

As per Section 135 of Companies Act, 2013 and rules made thereunder ("Companies Act") the Company is required to constitute a committee of board of directors to be called "CSR Committee", to consist of prescribed directors. Accordingly, the board of directors of the Company has constituted a committee in compliance with Section 135 of Companies Act. The CSR Committee shall act as per the applicable provisions of the law and within the terms of reference, if any, prescribed by Board of Directors of the company from time to time. The CSR Committee shall inter-alia-

formulate and recommend to the board, the CSR policy (including any amendment) and an annual action plan pursuant to the CSR policy, which shall indicate the CSR Activities to be undertaken by the Company which shall include the following, namely: -

• The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Companies Act, 2013;

• The manner of execution of such projects or programs as specified in Companies Act, 2013, and rules thereunder;

• The modalities of utilization of funds and implementation schedules for the projects or programs;

• Monitoring and reporting mechanism for the projects or programs;

• Details of need and impact assessment, if any, for the projects undertaken by the company:

Provided that board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect;

• Recommend to the board the amount of expenditure to be incurred on the CSR Activities;

• Monitor the Corporate Social Responsibility Policy of the Company from time to time; and

• Any other activity that the provisions of the Companies Act or any other applicable law may recommend.

3. CSR Activities

CSR Activities shall be undertaken in locations within India and preferably within (but not limited to) the local areas around which the Company operates.

The CSR activities ("CSR Activities") shall mean any of the activities included under Schedule VII of the Companies Act.

4. Implementation of CSR

The board of directors shall undertake and implement all CSR Activities of the Company pursuant to the annual action plan approved by CSR Committee, the CSR policy and recommendations of the CSR Committee. The Company may undertake its CSR activities directly by itself or through a company established under Section 8 of the Companies Act, 2013 or a registered trust or a registered society registered under Sections 12A and 80G of the Income Tax Act, 1961 or in compliance with Rule 4 of the Companies (Corporate Social Responsibility Policy) Rules 2014, as amended.

5. CSR Expenditure

The Company shall spend at least 2% of its average net profits made during 3 (three) immediately preceding financial years on its CSR Activities and shall ensure that any surplus arising from such activities shall also be spent on activities specified under this CSR policy. The CSR expenditure of the Company shall remain subject to the provisions of the Companies Act.

6. Treatment of Unspent / Excess Amounts

Any amount remaining unspent under its CSR Activities shall be transferred by the Company within a period of 30 days from the end of the financial year to a special account to be opened by the Company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the Company for CSR activities under this CSR Policy within a period of 3 financial years from the date of such transfer.

7. Monitoring

The board of the Company shall ensure that the CSR Activities as included in this CSR policy are undertaken by the Company. The CSR Committee shall monitor the CSR policy from time to time.

8. General

Any or all provisions of the CSR Policy would be subject to revision/amendment by the CSR Committee in accordance with the applicable laws as amended from time to time. In case of any conflict between provisions of this CSR Policy and the applicable laws, the provisions of the applicable laws shall supersede. Notwithstanding the absence of any provisions of the applicable laws in this CSR Policy, the Company shall comply with such provisions as if they are part of the CSR Policy. The CSR Committee or any person authorized by the board shall settle all queries, differences or doubts that may arise in relation to the implementation of the CSR Policy and CSR Activities as may be approved by the board.

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