

RAHUL CABLES PRIVATE LIMITED

Registered Office:

Office No110/111/114/115, East Wing, Aurora Towers,
M.G. Road Camp, Pune: 411001

E-mail: pune@rahulcable.com, Tel- 0202-41000100

CIN U31200PN1998PTC012787 Fax: 020-41000199

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY
RAHUL CABLES PRIVATE LIMITED

1. Introduction

1.1. RAHUL CABLES PRIVATE LIMITED Philosophy

At RAHUL CABLES PRIVATE LIMITED, we are committed to the RAHUL CABLES PRIVATE LIMITED Group's 'Good & Green' vision of creating a more inclusive and greener India. We never lose sight of our responsibility to the environment and society. Our commitments towards **Corporate Social Responsibility** include but not limited to, promotion of education and healthcare, energy and climate change, and betterment of the society through respect for universal human rights and the environment, acting with integrity and accountability and operating responsibly and sustainably.

1.2. CSR in India

Corporate bodies' involvement in CSR activities is not a new concept in India. Industrial majors are engaged in social development activities since long back. However, the **Companies Act, 2013** has brought it under the legal purview. The concept of CSR is introduced through "Comply-or-Explain" mandate. It mandates qualifying 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 "the CSR Rules") lay down the framework and modalities for carrying out CSR activities which are specified in Schedule VII of the Act.

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2. Objective and Scope

2.1. Objective

The main objective of the CSR Policy is to lay down guidelines for RAHUL CABLES PRIVATE LIMITED (hereinafter referred to as 'the Company') to make CSR as one of the key focus areas to adhere to RAHUL CABLES PRIVATE LIMITED global interest in environment and society that focuses on making a positive contribution to society through effective impact and sustainable development programs.

This Policy covers the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities.

2.2. Scope & Coverage

The CSR activities of the Company shall include, but not limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 amended from time to time. Further, the Company will review the sectors/activities from time to time and make additions/ deletions/ clarifications to the above sectors/activities.

3. Corporate Social Responsibility (CSR) Committee

3.1. Constitution

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the **Corporate Social Responsibility (CSR) Committee**. The Members of CSR shall be appointed by the Board of Directors of the Company which must

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consist of at least two or more Directors. Accordingly, the constitution of CSR Committee formed by RAHUL CABLES PRIVATE LIMITED India is as follows:

1	ASHOK BADALMAL KUKREJA	02061823	DIRECTOR
2	NANDKUMAR BADALMAL KUKREJA	02679886	DIRECTOR
3	RAJKUMAR BADALMAL KUKREJA	00958270	DIRECTOR
4	MUKESH BADALMAL KUKREJA	02742062	DIRECTOR

3.2. Functions and Powers of Committee

To effectively implement the objectives of the Company with respect to CSR, the Committee is vested with the following functions and powers:

- a. Formulate CSR Policy and recommend the same to the Board of Directors of the Company for approval
- b. Recommend CSR activities as stated under Schedule VII of the Act
- c. Approve to undertake CSR activities, if necessary, in collaboration with RAHUL CABLES PRIVATE LIMITED group companies/other Companies/firms/NGOs etc., and to separately report the same in line with the CSR Rules
- d. Recommend the CSR Budget
- e. Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules

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- f. Create transparent monitoring mechanism for implementation of CSR initiatives in India
- g. Submit the Reports to the Board in respect of the CSR activities undertaken by the Company
- h. Monitor CSR Policy from time to time
- i. Monitor activities/charter of Internal Working and Monitoring Group (WG) who are authorized to ensure that the CSR activities of the Company are implemented effectively
- j. Authorize executives of the Company to attend the CSR Committee Meetings, if necessary

3.3. Meetings of the Committee

For smooth functioning of the Committee, the members shall meet as below to discuss such matters and to take such decisions as may be necessary;

- a. The CSR Committee shall hold a minimum number of two meetings in a year.
- b. The members of the Committee may mutually agree between them regarding time and place for the said meetings.
- c. The quorum for the CSR Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.
- d. The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio visual means as may be convenient.

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4. CSR Spend

The Companies Act, 2013 prescribes that the companies which meet the criteria specified U/s. Sec. 135 shall allocate certain portion of its annual net profits (calculated as per Sec. 198) during the three immediately preceding financial years to be spent on CSR Activities that fall under the categories specified under Schedule VII of the Act.

4.1. CSR Expenditure

Net profit for the purpose of allocation towards CSR means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

4.2. Failure to spend the CSR Money

If the Company fails to spend the required amount in a particular financial year, it is the duty of the Committee to submit a report in writing to the Board of Directors specifying the reasons for not spending the amount, which in turn shall be reported by the Board of Directors in their Annual Report pertaining to that particular Financial Year.

Surplus, if any, arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.

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5. CSR Initiatives

Pursuant to Schedule VII of the Act and the CSR Rules, the Company shall undertake CSR activities included in its Annual CSR Plan, as recommended by the CSR Committee at the beginning of each year. The Committee is authorized to approve any modification to the existing Annual CSR Plan or to propose any new program during the financial year under review.

5.1. Annual CSR Plan

The Annual CSR Plan is a yearly plan of CSR activities that would be placed before the Board of Directors of the Company based on recommendation of its CSR Committee which outlines inter alia the following aspects of CSR initiatives of the Company:

- Project Proposals
- Targeted Beneficiaries and their key needs
- Alignment with Schedule VII
- Project Goals and milestones
- Activities and Timelines including expected closure dates
- CSR Budget with projections
- Monitoring mechanism
- Progress reporting and frequency of reports
- Risks and mitigation strategies
- Any other information as may be required by the CSR Committee

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5.2. Collaboration

It is expressly allowed under the CSR Rules that the Company may collaborate with any other Company or association formed in this regard subject to approval by CSR Committee, to implement CSR activities and the same shall form a part of the Annual CSR Plan.

6. Reporting and publication of CSR policy

As per the CSR Rules, the contents of the CSR Policy shall be included in the Directors' Report and the same shall be displayed on the Company's website, if any.

7. Monitoring Mechanism

An Internal Working and Monitoring Team comprising of below mentioned employees of the Company will be set up to ensure effective implementation and monitoring of the projects approved by the CSR Committee from time to time. The team will consist of :

- a. Mr. ASHOK BADALMAL KUKREJA
- b. Mr. NANDKUMAR BADALMAL KUKREJA
- c. Mr. RAJKUMAR BADALMAL KUKREJA
- d. Mr. MUKESH BADALMAL KUKREJA

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7.2 Reporting by Internal Working and Monitoring Team

The Internal Working and Monitoring Team will report / give feedback to the CSR Committee for all CSR projects undertaken.

The Internal Working and Monitoring Team shall submit reports to the CSR Committee of the Company at least once in six months on the progress of the various projects approved by the Committee and entrusted to the Group for implementation and monitoring.

8. Policy review and future amendment

The administration of the CSR Policy of the Company and the execution of identified CSR projects, programs and activities under it shall be carried out under the control and overall supervision of an internal monitoring group formed for this purpose. At the time of formation of this policy, the internal monitoring group shall consist of:

1. Mr. ASHOK BADALMAL KUKREJA
2. Mr. NANDKUMAR BADALMAL KUKREJA
3. Mr. RAJKUMAR BADALMAL KUKREJA
4. Mr. MUKESH BADALMAL KUKREJA

The internal monitoring group shall submit its report at least once in six months to the CSR committee formed under the Act, which shall monitor the CSR policy of the Company from time to time.

Further, the Board of Directors may revise/ amend this CSR Policy based on the recommendations of the CSR committee or to bring the same in line with the guidelines or amendments issued from time to time by Government on the subject.

ANNEXURE III
THE ANNUAL REPORT ON CORPORATE SOCIAL
RESPONSIBILITY ("CSR") ACTIVITIES

To,
The Members of
Rahul Cables Private Limited
PUNE

Your Directors have pleasure in presenting the Annual Report on Corporate Social Responsibility ("CSR") Activities for the financial year ended on 31st March, 2023.

1. A brief outline of the company's CSR policy, including overview of projects or programs proposed to be undertaken:

Vision:

Being a responsible business house through adoption of appropriate business processes and strategies and by carrying out various initiatives towards its social obligations.

Mission:

The Company has a philosophy of built-in, self-regulating mechanism whereby the Company monitors and ensures its active compliance with the spirit of the law, ethical standards and international norms.

CSR Objective:

The main objective of the CSR is to lay down guidelines for Rahul Cables Pvt Ltd. (herein referred to as 'the Company') to make CSR as one of the key focus areas to adhere to Rahul Cable Pvt. Ltd. Global interest in environment and society that focuses on making a positive contribution to through effective impact and sustainable development programs.



Finolex
Cables Limited



KEI
Wires and Cables

RR
KABEL

GLOSTER
CABLES

LAPP

BAJAJ
Leaping Trust



Raychem

SUBJECT TO PUNE JURISDICTION



The policy covers the proposed CSR activities to be undertaken by the company and ensuring that they are in the line with schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future activities.

Company's Corporate Social Responsibility Policy:

Your Company maintains standard of corporate conduct towards its shareholders, customers, employees, all other stakeholders and society in general. The Corporate Social responsibility will help in ensuring a long-term balanced & inclusive growth.

To that effect, the Company has adopted the policy of Corporate Social Responsibility to comply with CSR.

2. The Composition of the CSR Committee:

Pursuant to the provisions of Section 135 of the Companies Act, 2013 read with The Companies (Corporate Social Responsibility Policy) Rules, 2014, the Board has constituted Corporate Social Responsibility ("CSR") Committee. As at 31st March, 2023 the CSR Committee consists of:

Sr. No.	Name of the Members	Designation
1.	Ashok Badalmal Kukreja	Chairman of the Committee
2.	Nandkumar Badalmal Kukreja	Member
3.	Rajkumar Badalmal Kukreja	Member
4.	Mukesh Badalmal Kukreja	Member

3. Average net profit (PBT) of the Company for last three financial years: Rs. $(1661.27+1600.83+ 1856.14)/3 =1706.08$

4. Prescribed CSR Expenditure (two percent of the amount as in item 3 above): Rs. $1706.08*2\%= 34.12$



5. Details of CSR spent during the financial year: As per point no. 5(c)

Particular	2023	2022
a) Opening provision	0.00	78.05
b) Created During the Year	34.12	34.84
c) Utilisation During the year	34.33	113.89
d) Closing Provision	(0.21)	(0.0)

(e) Manner in which the amount spent during the financial year is detailed below: Refer enclosed **COPY OF RECEIPT IS ATTACHED AS Schedule - I.**

6. Reasons for not spending the prescribed amount:

During the year the Company has spent entire amount of CSR i.e. up to 31/03/2024 therefore there was no any reasons for not spending the CSR prescribed amount.

7. Responsibility Statement:

"The implementation and monitoring of Corporate Social Responsibility (CSR) Policy, is in compliance with CSR objectives and policy of the Company."

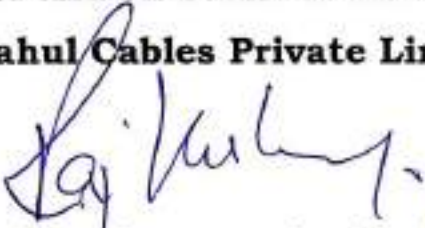


8. Acknowledgement:

The Committee would like to express their heartfelt grateful to all Bankers, Government Authorities, Customers, Vendors and Business Partners for their continued support and association.

For and on behalf of the Board of Directors

Rahul Cables Private Limited



Rajkumkar B Kukreja

Director

DIN 00859270

DATE: 29/09/2023

PLACE: PUNE


Mukesh B Kukreja

Director

DIN 02742062



Enclosed: CSR Expenditure - Schedule - I