



CORPORATE SOCIAL RESPONSIBILITY POLICY OF REFEX INDUSTRIES LIMITED

(RIL)

OBJECTIVE

The main objective of CSR Policy is to make CSR a key business process for sustainable development of society, RIL will act as a good corporate citizen and aims at supporting the Govt. in enhancing welfare measures of the society within the framework of its policy.

DEFINITIONS

“Act” means the Companies Act 2013

“Board” means the Board of directors of Reflex Industries Limited (“RIL”) **“Company”** refers to RIL

“Committee” means the internal CSR committee of RIL constituted formulating, recommending & expenditure monitoring of CSR activities.

“CSR” refers to Corporate Social Responsibility **“CSR Activities”** means activities covered under Schedule VII of the Act

SCOPE AND APPLICABILITY

This policy shall be applicable to REFEX INDUSTRIES LIMITED and shall be effective from 13th August 2019

POLICY STATEMENT

For RIL, responsible business practices include being responsible for our business processes, engaging in responsible relations with employees, customers and the community. Hence for the Company, Corporate Social Responsibility goes beyond just adhering to statutory and legal compliances, and creates social and environmental value while supporting the company’s business objectives and reducing operating costs, and at the same time enhancing relationships with key stakeholders and customers.

ACTIVITIES OF THE COMMITTEE

RIL’s commitment to CSR will be manifested by investing resources in one or more of the following areas:

- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;

Reflex Industries Limited

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- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently-abled and livelihood enhancement projects;
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, daycare centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water;
- 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;
- Measures for the benefits of armed forces veterans, war widows and their dependents; –
- Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- Contribution to the Prime Minister’s National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- Contribution of funds to technology incubators located within academic institutions which are approved by the Central Government; –

COMPOSITION AND POWERS OF THE COMMITTEE

COMMITTEE CONSISTS OF FOLLOWING MEMBERS

Sl. No.	Name of the Member	Designation	Category
1	Mr. Pillapan Amalanathan	Independent Director	Chairman
2	Mr. Anil Jain	Executive Director	Member
3	Mr. Dinesh Kumar Agarwal	Non - Executive Director	Member

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POWERS OF THE COMMITTEE

- To recommend the amount of expenditure to occur on the activities under CSR
- To monitor the Corporate Social Responsibility Policy of the Company from time to time
- To ensure that the company spends, in every financial year, at least two percent of the average net profit for CSR. If the Company fails to spend such amount, the Board shall, in its report specify the reason for not spending the amount.
- To institute transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company.

CSR THROUGH EXECUTING AGENCY, TRUST AND PARTNERS:

The Committee may decide to undertake CSR Projects through any of the following modes:

- Either directly by RIL
- Through registered trust or Society or a Section 8 Company established by RIL or its Holding Company or subsidiary or associate Company.
- Any trust, society or Company, which is not established by RIL (including Section 8 Companies), having an established track record of three years in undertaking similar programs or projects, subject to the requirements specified in the CSR Rules
- As a consortium with other Companies
or a registered trust or Society or a Section 8 Company established by RIL or

The Committee may also decide to involve specialized agencies, which could include NGOs, Trusts, Self-Help Groups, Govt./ Semi- Govt./ Autonomous Organisations, Educational Institutions, Professional Consultancy Organisations, Registered Voluntary Organisations, or any other appropriate agency/ authorities.

The Committee shall explore the possibility of collaboration with similar 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.

IMPLEMENTATION AND PROJECT SELECTION:

CSR committee will be the controlling authority w.r.t the Project selection

The committee may shortlist & selects the projects including key focus areas (Ex. Women Education, Women Employment, Environment Protection) which are listed in Schedule VII of the Act.

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- a) The committee shall decide to execute the projects through RIL's employees and/ or through relevant external agencies
- b) The selection executing team/external agencies for CSR will be done on the basis of their willingness, interest and past track record.

PROJECT FUND ALLOCATION:

- a) Fund allocation for the project shall be the committee's discretion based on the project report submitted
- b) All expense reports of the projects shall be kept readily available
- c) The expenses towards the projects shall be submitted & settled on a regular basis
- d) Any additional expenses incurred other than those mentioned in the project budget shall be done only after obtaining the board approval
- e) The Management & Monitoring of the projects will be under the direct supervision of the committee members

CSR EXPENDITURE

CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Projects undertaken in accordance with the approved CSR Plan. Moreover, any surplus arising from any CSR Projects shall be used for CSR Only.

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