



**R I C H B O N D**  
CAPITAL PRIVATE LIMITED

## **RICHBOND CAPITAL PRIVATE LIMITED**

### **CORPORATE SOCIAL RESPONSIBILITY POLICY**

#### **1. INTRODUCTION:**

Richbond Capital Private Limited ("RCPL") is one of the leading Non-Banking Financial Companies registered under the Companies Act, 1956 having its registered office at 905, One Lodha Place, Senapati Bapat Marg, Lower Parel West, Mumbai 400013. RCPL believes that holistic approach towards business strategies would be complete when it also includes a well-defined approach to participate in Corporate Social Responsibility ("CSR") activities.

RCPL is predominantly focused in the unsecured loans for various entities for working capital requirements. As part of its CSR activities, RCPL intends to focus on certain projects which shall include initiatives mainly in the fields of education, skill development, women empowerment and rural development which will enable creation of a sustainable livelihood in society and better human capital.

This policy is aimed at providing a framework within which the Company will endeavor to implement CSR activities in the society by addressing concerns of the needy sections of the society. This Policy is made in accordance with the Companies Act, 2013("Act") read with Companies (Corporate Social Responsibility) Rules, 2014 ("Rules") and forms part of RCPL's key business process and is as per the recommendations of the CSR Committee (as defined herein below). This Policy has been approved by the Board of Directors of RCPL ("Board").

The CSR Policy shall recognize areas to create an ecosystem and work in tandem with grassroot level working partners and implementing bodies/local statutory authorities, Central Government, Universities, Women and Child Welfare Department, Rural Development cell, Non-Governmental Organisations (NGO's) and notable individuals / social workers.

#### **2. CSR VISION OF RCPL:**

Life Matters...!!!

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📍 905 One Lodha Place, Senapati Bapat Marg, Next to Kamla Mills, Lower Parel West, Mumbai 400013.



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RCPL believes that its mandate does not end with multiplying returns to the shareholders and that it must fulfill its larger responsibility towards the society within which it operates and from which it draws sustenance. There can be nothing better than enriching the human capital of the society and towards this end RCPL will strive to cause a sustainable impact in elevating the present levels of skill and education of the neediest sections of our society, particularly women and the differently- able.

To begin with, RCPL will focus on the following broad areas;

- a. Higher Education;
- b. School Education;
- c. Skill Development;
- d. Women and Children;
- e. Person with disability.

### 3. CONSTITUTION OF THE CSR COMMITTEE:

In accordance with the Act, the Board of RCPL has constituted the Corporate Social Responsibility Committee ("CSR Committee").

The CSR Committee shall, inter alia, perform the following functions:

Formulate and recommend to the Board, a CSR Policy which shall indicate the framework within which the proposed CSR activities would be undertaken;

Select and approve CSR projects which will be identified based on the proposed thematic areas as provided under the Act and Rules therein;

Recommend the amount of expenditure to be incurred on the CSR projects; and

Monitor the implementation of the CSR Policy from time to time and take such other actions as it may deem fit in pursuance of the CSR Vision of RCPL.



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#### 4. AUTHORITY OF CSR COMMITTEE:

To implement the CSR Policy, the CSR Committee is authorized to:

- i. Undertake activities approved in this Policy and make expenditure in relation to programme and projects as defined in the Policy.
- ii. Spend an amount equivalent to the 2% of the average net profits of the Company made during the immediately preceding three financial years, in pursuance of the CSR Policy.

#### 5. CSR PROJECTS, PROGRAMMES AND ACTIVITIES:

In accordance with the CSR philosophy of RCPL following projects have been identified:

- a. Richbond Shiksha Yogdan (education sponsorship)
- b. Richbond Vidhya Abhiyan (adopting school run by local govt/bodies)
- c. Richbond Rozgar (skill developments)

#### 6. SCREENING PROCESS FOR IDENTIFICATION OF BENEFICIARIES OF CSR PROJECTS, PROGRAMMES AND ACTIVITIES:

RCPL shall adopt a two-tier screening process for identification of beneficiaries of the CSR initiatives. First level of screening shall be undertaken by the CSR and HR team of the RCPL and the shortlisted beneficiaries shall be presented before the members of the CSR Committee. Any two members of the CSR Committee shall decide on the final beneficiaries.



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## 7. IMPLEMENTATION AND MONITORING FRAMEWORK:

RCPL shall form a trust for implementation (hereinafter referred to as 'CSR Trust') and shall institute a transparent monitoring mechanism for implementation of the CSR projects/programs/activities undertaken through the CSR Trust. For the said purpose, the management of the CSR Trust shall submit its report to the CSR Committee at the end of every month over an e-mail and by way of a preparation over a period of 3 (three) months. In the interim, before the proposed CSR Trust is floated /registered for the purposes, RCL shall undertake the activities through its CSR division and the CSR division shall submit its report to the CSR Committee on its activities.

The CSR Committee through the trustees/management of the CSR Trust shall:

Ensure that the CSR projects are implemented in terms of the CSR policy of the Company.

MIS process to be instituted for each of the projects - the MIS shall be in the format approved by RCPL Committee. The reporting format of RCPL CSR projects shall include (but not limited to) itemized heads of expenditure incurred, overheads/cost incurred by RCPL (in any), specific areas/geographies and beneficiaries impacted, cumulative expenditure spent up to the reporting period.

Closely monitor the implementation schedules of each of the projects; and where there has been delay in the implementation schedules, the reasons for delay to be looked into and addressed to the extent possible.

Ensure all the funds disbursement in respect of CSR programmes are directed only towards the projects/programmes set out in the CSR Policy and funds are released against verified utilizations through approved project plans.

Ensure that all the surplus generated through the CSR activities are deployed by the CSR Trust in undertaking its activities and shall never form part of the profits of RCPL.

The CSR Committee may undertake periodic or surprise field visits, interact with the beneficiaries of the projects and undertake independent evaluation.



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## 8. SURPLUS OF CSR PROJECTS:

In line with the guidelines provided under the Act and Rules, surpluses, if any arising out of the projects or programs or activities shall not form part of the business profit of RCPL.

## 9. REPORTING:

The CSR Trust shall prepare reports on a periodic basis (one month, quarter or six months basis) and the said report shall provide complete details on the activities and/or projects taken up under the CSR Policy and shall also incorporate therein the impact analysis of the CSR efforts.

Impact analysis/assessment shall be based on an objective evaluation of the CSR project's scope together with specific parameters (if any) and expected outcomes/outputs within the appropriate timelines.

CSR Trust shall also provide a consolidated 12 (twelve) months activity and impact report in the format prescribed in the Rules, which will be included in the Annual Report of the RCPL. The report on financial spending by the CSR Trust shall be duly audited by a competent Auditor appointed by the Board.