




RADHIKA OPTO ELECTRONICS LIMITED

POLICY ON CORPORATE SOCIAL RESPONSIBILITY

 cs@radhikaled.com



A. PREAMBLE

Radhika Opto Electronics Limited stands committed to the social and economic development of the communities in which it operates. The company's commitment towards this includes contributing to Institutions which are engaged in activities aligned to the activities forming part of its CSR policies

B. PURPOSE

The key purpose of this policy is to:

- Define what CSR means to us and the approach adopted to achieve our CSR goals.
- Define the kind of projects that will come under the ambit of CSR.
- Identify broad areas of intervention in which the company will undertake projects.
- Serve as a guiding document to help execute and monitor CSR projects.
- Establish criteria for partner implementation agencies.

C. POLICY STATEMENT

The CSR Policy of Radhika Opto Electronics Limited focuses on addressing critical social, environmental and economic needs of the underprivileged and downtrodden sections of the society. We adopt an approach that integrates the solutions to these problems into the strategies of the company to benefit the communities at large and create social and environmental impact. The policy includes contributing or adopting projects in the following areas of intervention defined in Schedule VII of the Companies Act:

- Livelihood enhancement projects.
- Ensuring environmental sustainability.
- Promoting education.
- Other activities defined in Schedule VII as may be identified in future by the CSR Committee.



D. SCOPE OF CSR ACTIVITIES

We classify only those projects which are not forming part of the normal course of business of the company. All our CSR projects will be reviewed and updated by the CSR committee of the Board. The normal course of business of the company is to manufacture a comprehensive range of LED Luminaires, serving all major OEMs in India.

E. GOVERNANCE STRUCTURE

The Company has constituted the CSR Committee to oversee the implementation of the CSR policy of the company in accordance with the requirements of Section 135 of the Companies Act. The Committee shall consist of Three Directors viz one independent Director, one Non-Executive Directors and one Managing Director shall report to the Board. The Independent Director shall be the Chairman of the Committee.

The responsibilities of the CSR committee include:

- The CSR Committee shall indicate the activities to be undertaken by the company as specified in Schedule VII;
- The CSR Committee shall recommend the amount of expenditure to be incurred every financial year at least two percent of the average net profits of the company calculated under section 198 of the Act, made during the three immediately preceding financial years;

Any other executive of the company associated with the CSR activities of the company will report to the CSR committee for all CSR projects undertaken.

F. IMPLEMENTATION

- a. The CSR projects or programs or activities will be undertaken in India only.
- b. The Company may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that it is in a position to report separately on such activities in accordance with the rules.
- c. The CSR projects or programs or activities that benefit only the employees of the company and their families shall not be considered as CSR activities.



d. Companies may build CSR capacities of their own personnel as well as those of their implementing agencies through Institutions with established track records of at least three financial years but such expenditure including expenditure on administrative overheads, shall not exceed five percent of total CSR expenditure of the company in one financial year.

e. The Company shall not contribute any amount directly or indirectly to any political party.

G. FUNDS

In every Financial Year, the company will contribute 2% of the average net profits of the company made during the three immediately preceding financial years for implementation of CSR projects.

H. CSR THROUGH REGISTERED TRUST, SOCIETY, OTHERWISE

The Board of the Directors of the Company may decide to undertake the CSR activities approved by the Committee through a registered Trust or a registered Society or a company established by the Company or its holding or its subsidiary or associate company under Section 8 of the Act. However, such trust, society or company, if not established by the Company or its holding company or subsidiary company or associate company, shall have an established track record of at least 3 years in undertaking such programmes or projects. Such Trust or a registered society or Company established under Section 8 of the Act shall be registered with the Central Government by filing Form CSR-1 electronically with the registrar as per the rules to be notified by the Government.

I. MONITORING MECHANISM

The CSR Committee shall institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the company. The Company Secretary of the Company shall assist the CSR Committee and the Board for performing their respective duties under the CSR Policy, any changes by the Government in the regulations governing the CSR activities. The CSR Committee of the Company will analyze the implementation of CSR activities at various areas and report to the Board. The CSR Committee shall meet at least once in a year to monitor the implementation of CSR projects or programs.

J. SURPLUS OF CSR PROJECTS

The surplus, if any, during any year arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company and will be ploughed back into the CSR activities.



K. DISCLOSURES

The Committee shall ensure that the CSR Policy, as amended from time to time, is displayed on the company's website. The CSR Committee shall place before the Board, a draft report on CSR activities in a board meeting every financial year for Board's review and finalization. The Board shall include in its report to the shareholders, the annual report on CSR activities as per the format specified under the Rules.

Note: Any or all the provisions of the CSR policy would be subject to revision / amendment by the Board of Directors of the Company based on the recommendations of the CSR committee in accordance with the guidance on the subject issued by the government authorities from time to time.

For Radhika Opto Electronics Limited

A handwritten signature in black ink, appearing to read 'Saaili Umalkar', is written over a horizontal line.

CS. Saaili Umalkar

Company Secretary & Compliance Officer

Date: 05th June, 2023

Place: Mumbai