



CSR POLICY

I. Introduction

At Roto Pumps Ltd., the Corporate Social Responsibility (CSR) has been an integral part of the way we have been doing our business. In terms of the provisions of Section 135 of the Companies Act, 2013 ("Act"), rules made thereunder and the listing agreement with the Stock Exchanges, the Company is required to spend a requisite amount on the CSR activities.

II. Objective of the Policy

The objective of the policy is to lay down the basic framework to undertake various programs and activities by the Company relating to corporate social responsibility and monitoring of those activities in terms of the provisions of Section 135 of the Companies Act, 2013, rules made thereunder read with circular no. 21/2014 dated 18th June, 2014 and the listing agreement with the Stock Exchanges.

III. Definitions

- a. Act means the Companies Act, 2013 as amended from time to time;
- b. Board means Board of Directors of the Company;
- c. Committee means Corporate Social Responsibility Committee of the Company.
- d. CSR means Corporate Social Responsibility;
- e. CSR Policy means the Corporate Social Responsibility Policy of the Company;
- f. CSR rules means Companies (Corporate Social Responsibility) Rules 2014 as amended from time to time;
- g. CSR spend means spending by the company on CSR activities;
- h. Implementation Agency or Organization means the agency or organization such as NGO/ Trust/ Society/Institution etc. engaged in the activities qualifying to be CSR activities.

IV. CSR Committee

The Board has constituted a CSR Committee. Constitution of the CSR Committee is as under

Sl	Name of the Members	Position
1	Mr Akhil Joshi	Chairman
2	Mr. Anurag Gupta	Member
3	Mr. Arvind Veer Gupta	Member



V. Role of the Committee

Role of the CSR Committee includes;

- (a) formulate a CSR Policy and recommend to the approval of the Board and recommend amendments thereto;
- (b) recommend and review the CSR activities to be undertaken by the Company and amount to be incurred thereon and also to select the implementation agency or organization for CSR activities to be undertaken;
- (c) review and monitor progress of the CSR activities undertaken by the Company and CSR policy;
- (d) review and recommend the CSR report to be included in Board Report.

VI. CSR Activities: -

The Company may undertake the following activities as CSR activities:

- a. Eradicating hunger, poverty and malnutrition, Rural development, slum development. Backward area development including provision of sanitation, lighting and safe drinking water in those areas;
- b. Promotion of health care activities and health care research activities and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- c. Promotion of education aimed at promotion of elementary to professional education and support to the students of weaker section including SC/ST/OBCs including by way providing libraries, books and other study materials, vocational trainings, scholarships or other merit based assistance;
- d. Ensuring environmental sustainability, ecological balance, conservation of natural resources and maintenance of quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- e. 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 art and handicrafts;



- f. Activities for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- g. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- h. Contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- i. Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine and to public funded Universities as specified in schedule VII of the Act;
- j. The Company may undertake any of the project, program or activities falling in the any of the activities specified under schedule VII to the Act as approved by the Board on the recommendation of the Committee;
- k. The Company may undertake CSR activities directly or through Implementation Agency or Organization as prescribed under the Act.

VII. Exclusion from CSR

The following activity shall not form part of the CSR activities of the Company:-

- a. The activities undertaken in pursuance of normal course of business of a company.
- b. CSR projects/programs or activities that benefit only the employees of the Company and their families.
- c. Any expenditure towards organizing events such as marathons/ awards/ charitable contribution/ advertisement/sponsorships of TV programmes etc.

Expenses incurred for the fulfillment of any statutory requirements.
- d. Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
- e. Any CSR projects/programs or activities undertaken outside India.



VIII. CSR Spend

The committee shall endeavor to spend at least 2% of the average net profit during the preceding 3 financial years on CSR activities.

Any surplus arising out of the contribution made for CSR Activities shall not form part of the business profit of the Company and redeployed for such activities.

IX. Monitoring & Reporting

The CSR Committee will be responsible for the monitoring the CSR activities and report to the Board from time to time.

The CSR Committee shall have the power to:

- a. Seek monitoring and implementation report from the Organizations or Implementation Agency receiving funds.
- b. Delegate a designated company official to co-ordinate with the Organizations or Implementation Agency receiving funds to inspect the activities undertaken and ensure information in a timely manner.

The following processes will be followed:

- a. Receipt of proposals / requests form District Administration / Local Government or an Implementation Agency and assessment of the same;
- b. Consideration of proposal by the CSR Committee and recommendation to the Board for approval and disbursement of the fund;
- c. Once the amount is disbursed to the Implementation Agency, it will be required to provide a detailed annual report of the activities and certification of the utilization of the fund.

The Board shall satisfy itself that the funds disbursed towards fulfilment of CSR obligations of the Company have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

In case of ongoing project, the Board shall monitor the implementation of the CSR project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the CSR project within the overall permissible time period.



X. Disclosures

The Annual Report of the Company include a section on CSR outlining the CSR Policy, CSR committee, CSR initiatives undertaken by Company, the CSR spend during the financial year and other information as required by law from time to time.