

## **RENAISSANCE INVESTMENT MANAGERS PRIVATE LIMITED**

### **Corporate Social Responsibility (CSR) Policy**

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## 1. INTRODUCTION AND PURPOSE OF THE CSR POLICY

Corporate Social Responsibility (CSR) at Renaissance Investment Managers Private Limited ("RIMPL" or "the Company") is guided by the belief that businesses must contribute meaningfully to the social, environmental, and economic development of society. Hence, the Company adopts a structured and impact-oriented CSR approach aligned with the statutory requirements under the Companies Act, 2013.

The purpose of this CSR Policy is to outline the statutory obligations, focus areas, and implementation guidelines in compliance with the Companies Act, 2013, that the Company must fulfil as a responsible corporate entity.

## 2. DEFINITIONS

For the purpose of this Policy, unless the context otherwise requires:

- **Act** means the Companies Act, 2013.
- **Board** means the Board of Directors of Renaissance Investment Managers Private Limited.
- **Company** means Renaissance Investment Managers Private Limited.
- **CSR or Corporate Social Responsibility** means the activities undertaken by the Company in accordance with Section 135 of the Companies Act, 2013 read with Schedule VII thereto.
- **CSR Committee** means the Corporate Social Responsibility Committee constituted by the Board pursuant to Section 135 of the Companies Act, 2013.
- **CSR Policy** refers to this Corporate Social Responsibility Policy and relates to the activities to be undertaken by the Company as specified in Schedule VII of the Act and the expenditure thereon.
- **CSR Rules** means the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.
- **Implementing Agency** means any entity eligible and sufficiently registered with relevant governmental authorities for implementing CSR activities in compliance with provisions of the Act read with the CSR Rules.
- **Net Profit** means the net profit of the Company as defined under Section 198 of the Companies Act, 2013.
- **Ongoing Project** means a multi-year project undertaken by the Company in fulfilment of its CSR obligation, having timelines not exceeding three years excluding

the financial year in which it was commenced and includes such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification.

- **Unspent Corporate Social Responsibility Account** means the account opened by the Company pursuant to Section 135 of the Companies Act, 2013 to transfer the unspent CSR amount relating to ongoing projects.

Words and terms not defined herein shall have the meanings assigned to them under the Act and the CSR Rules.

### **3. NEED FOR THE CSR POLICY AND CSR COMMITTEE**

For the purpose of applicability of Corporate Social Responsibility (CSR) provisions, Section 135 of the Companies Act, 2013 shall apply to every company which, during the immediately preceding financial year, meets any one or more of the following thresholds:

- Net worth of ₹500 crore or more; or
- Turnover of ₹1,000 crore or more; or
- Net profit of ₹5 crore or more.

Section 135 of the Companies Act, 2013 mandates that companies meeting the prescribed financial thresholds shall constitute a Corporate Social Responsibility Committee of the Board, formulate a CSR Policy, and ensure spending of at least two percent (2%) of the average net profits of the company made during the three immediately preceding financial years on CSR activities specified under Schedule VII of the Act.

As per Section (9) of 135 of the Companies Act, 2013, where the amount to be spent by a company does not exceed fifty lakh rupees, the CSR Committee shall not be applicable and the functions of such Committee provided under this section shall, in such cases, be discharged by the Board of Directors of such company.

### **4. POWER OF THE BOARD**

The Board of Directors shall have overall responsibility for CSR governance and shall:

- Approve the CSR Policy and amendments thereto;
- Ensure that CSR activities are implemented in accordance with this Policy;
- Monitor utilization of CSR funds and ensure statutory compliance; including the treatment of surplus, in accordance with applicable provisions of the CSR Rules;
- Approve the Annual Action Plan recommended by the CSR Committee;
- Approve disclosures in the Board's Report and on the Company's website;

## 5. AREAS OF CSR ACTIVITIES

The areas of CSR activity shall include, but not be limited to, the following:

(i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care 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.

(ii) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.

(iii) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.

(iv) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga.

(v) 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.

(vi) Measure for the benefit of armed force veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows.

(vii) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sports.

(viii) Contribution to the Prime Minister's National Relief Fund or Prime Minister's Central Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women;

(ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defence Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of

Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

(x) Rural development projects.

(xi) Slum area development.

(xii) Disaster management, including relief, rehabilitation and reconstruction activities.

Any activity not specifically listed above shall be undertaken only if it falls within the scope of Schedule VII of the Companies Act, 2013, with the approval of the Board of Directors or the CSR Committee, as applicable.

## **6. MODE OF IMPLEMENTATION**

The Company has established its own arm, namely Renaissance Care Foundation, for the implementation of CSR projects and programs.

The Company may carry out its CSR activities through Renaissance Care Foundation, subject to compliance with the provisions of the Act and the CSR Rules, as amended from time to time.

CSR programs, projects or activities should be implemented through following methods:

- i. directly by the Company;
- ii. through Implementing Agencies; and/or
- iii. in collaboration with other organizations/group companies, provided that the CSR Committees of the respective companies are able to report separately on such projects in accordance with the CSR Rules.

## **7. GUIDELINES FOR CSR ACTIVITIES**

- The Company may undertake CSR projects as ongoing projects in accordance with this CSR Policy and the timelines and conditions prescribed under the CSR Rules, subject to approval of the Board on the recommendation of the CSR Committee.
- CSR activities shall not include activities undertaken in pursuance of the normal course of business of the Company or activities specifically excluded under the CSR Rules, as amended from time to time.
- 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 in accordance with section 135 of the Act.
- The CSR projects or programs or activities shall not be driven by marketing, sponsorship, or brand promotion objectives.

## **8. CSR EXPENDITURE**

The Company shall spend at least 2% of the average net profits of the three immediately preceding financial years on CSR activities, as prescribed under the Act.

- Administrative overheads shall not exceed 5% of total CSR expenditure;
- Any surplus arising out of CSR activities shall not form part of the business profits of the Company and shall be ploughed back into CSR projects or transferred in accordance with CSR Rules;
- Unspent CSR amounts shall be dealt with strictly as per statutory provisions;
- Excess CSR expenditure, if any, may be set off against future obligations subject to applicable rules.

The Board shall ensure that the company spends at least 2% of the average net profits of the preceding three financial years on CSR activities every financial year, on or before 31st March. Any unspent amount, unless related to an ongoing project, must be reported with reasons and transferred to a Fund specified in Schedule VII within six months of year-end. For ongoing projects, the unspent amount is to be deposited in a special Unspent CSR Account and spent within three financial years, failing which it must be transferred to the Schedule VII Fund.

## **9. ANNUAL ACTION PLAN**

The CSR Committee shall formulate and recommend to the Board an Annual Action Plan in pursuance of the CSR Policy, in accordance with the provisions of Section 135 of the Companies Act, 2013 and Rule 5(2) of the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

The Annual Action Plan shall include the following:

- i. List of CSR projects or programmes to be undertaken in areas or subjects specified in Schedule VII of the Act;
- ii. The manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4 of the CSR Rules;
- iii. The modalities of utilisation of funds and implementation schedules for the projects or programmes; and
- iv. Monitoring and reporting mechanism for the projects or programmes.

The Board of Directors may alter the Annual Action Plan during the financial year, subject to compliance with applicable provisions of the Companies Act, 2013 and the CSR Rules.

## **10. REPORTING AND DISCLOSURE**

The Company shall:

- Disclose CSR activities and expenditure in the Board's Report;

Renaissance Investment Managers Private Limited

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- File Form CSR-2 and other statutory returns within prescribed timelines;
- Publish CSR information on the Company's website, as applicable.

## **11. AMENDMENTS**

The Board of Directors may amend this Policy based on recommendations of the CSR Committee, changes in law, or evolving CSR best practices.

## **12. CONCLUSION**

Renaissance Investment Managers Private Limited is committed to making a positive impact on society and the environment through meaningful CSR initiatives. This policy reflects the Company's dedication to contributing to social well-being, sustainability, and the overall development of the communities it serves.

For any inquiries or further details on our CSR programs, please contact [compliance@renaissanceinvest.in](mailto:compliance@renaissanceinvest.in)