

R.N. LABORATORIES PRIVATE LIMITED

Corporate Social Responsibility Policy



RN LABORATORIES

Group of Garonit Pharma

I. AIMS AND OBJECTIVES

The objective of framing this Corporate Social Responsibility (CSR) Policy is to ensure that the Company operates its business in an economically, socially, and environmentally sustainable manner by enhancing the quality of life & economic well-being of society in fulfillment of its role as a socially responsible corporate entity.

In this regard, the CSR Policy has been formulated and recommended by the CSR Committee and adopted by the Board of Directors at its meeting held on 13th August, 2025.

II. PURPOSE

The CSR Policy sets out our commitment to ensuring that our activities extend beyond business and include initiatives and endeavors for the benefit and development of the community and society. The CSR Policy lays down the guidelines for undertaking programs geared towards social welfare activities or initiatives. Through this CSR Policy, the Company proposes to adopt short-, medium- and long-term CSR programs and initiatives. This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act, 2013 (“Act”) and the rules issued thereunder.

III. CONSTITUTION, COMPOSITION AND SCOPE OF CSR COMMITTEE

1. The CSR Committee shall be responsible for providing recommendations to the Board with respect to CSR activities that may be undertaken by the Company in accordance with the CSR Policy as well as the Act and the CSR Rules.
2. The CSR Committee shall consist of at least two or more directors of the Company as the Board may deem fit from time to time, to be appointed from among the Directors of the Company. The number of members of the CSR Committee and their powers and functions can be specified, varied, altered or modified from time to time by the Board, subject to the provisions of the applicable law.
3. The CSR Committee shall hold meetings which shall be attended by a minimum of two members of the Committee. The meetings shall be held at the registered office or at any other place as may be agreed upon by the members of the Committee.
4. All questions of interpretation or discrepancies which shall arise under, or as a result of, or pursuant to, or in connection with the implementation of the CSR Policy or any initiative or activities undertaken by the Company in terms of the CSR Policy, shall be referred to the CSR Committee for its inputs and the final decision/determination/interpretation shall rest with the Board.
5. No member of the CSR Committee shall be personally liable for any decision or action taken in good faith with respect to the policy.

IV. CORPORATE SOCIAL RESPONSIBILITY ACTIVITIES (Areas of interest)

The Company shall upon the recommendation of its CSR Committee and with necessary approval of the Board, may undertake any of the following activities, as part of its corporate social responsibility initiatives, in areas and subject specified in Schedule VII of the Companies Act 2013:

(a) Areas of Interest:

- (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 centers 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 set-up 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 art and handicrafts;
- (vi) Measures 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;
- (vii) Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- (viii) 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 Government. for socio-economic development and relief and welfare of the Schedule Castes, tribes, other backward classes, minorities and women;

- (ix) Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Biotechnology (DBT), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- (x) Defence Research and Development Organisation (DRDO) and Department of Biotechnology (DBT).
- (xi) Rural development projects
- (xii) Slum area development.
- (xiii) Disaster management, including relief, rehabilitation and reconstruction activities.

CSR activities approved by the CSR Committee through a company established under section 8 of the Act or a registered trust or a registered society or through a company established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature Companies (Corporate Social Responsibility Policy) Amendment Rules, 2016 notified through notification dated 23rd May, 2016).

The Company may update the above list in accordance with Section 135 and Schedule VII of the Act, as amended from time to time.

V. IMPLEMENTATION AND RESOURCES FOR THE CSR ACTIVITIES

The company may implement CSR activities in the following manner:

- (1) The CSR activities shall be undertaken by the Company, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business.
- (2) The Board of a company may decide to undertake its CSR activities approved by the CSR Committee, through
 - (a) The Neelam Garg Foundation, a company established under Section 8 of the Act
 - (b) Any Company established under Section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature, or

- (c) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.
- (3) Subject to provisions of sub-section (5) of section 135 of the Act, the CSR projects or programs or activities undertaken in India only shall amount to CSR Expenditure.

• **Identification of CSR Proposals:**

- The CSR funds of the Company may be routed through the Implementing Agency Neelam Garg Foundation, the section 8 Company incorporated under Companies Act, 2013.
- The Company may spend the CSR amount in other manner, as specified in the CSR policy or Companies Act, 2013. In that case the CSR Committee may identify and receive CSR project proposals from Organizations in line with Areas of Interest as set out herein provided:

• **Approval Process:**

1. The following details of any CSR Activities to be undertaken by the Company shall be presented to the Board by the CSR Committee along with its recommendations:
 - The objectives and expected results of the CSR Activity;
 - The relevant sector and the nature of the CSR Activity;
 - The focus area/ location for implementation of the CSR Activity;
 - The amount to be allocated towards the CSR Activity;
 - The indicative timelines for completion of the CSR Activity;
 - Whether the CSR Activity should be undertaken by the Implementation Group or any Implementing Agency or in collaboration with any other company; and
 - Such other details as it may deem necessary
2. In case any of the CSR Activities to be undertaken are anticipated to be long term, then a detailed estimate on implementation schedule or milestones should be submitted by the CSR Committee to the Board.
3. Based on the recommendations of the CSR Committee, the Board shall approve the following:
 - The specific CSR Activities that should be undertaken by the Company from time to time;
 - The amount that should be deployed towards such CSR Activity;
 - Whether the CSR Activities will be undertaken directly by the Company or through an Implementing Agency or in collaboration with any other companies

Upon receipt of the CSR proposal, the CSR Committee shall evaluate the same in accordance with this policy.

• **Our Approach to Implementation:**

The principal implementor of our CSR activities would include:

- Contribution to Neelam Garg Foundation, section 8 company registered as Implementing Agency for the purpose of CSR
- Contribution to various funds which are aligned with our Vision and Mission
- Our Approach shall cover activities which are included in the Schedule VII of the Companies Act, 2013.

• **CSR EXPENDITURE**

- (1) The board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.
- (2) Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- (3) Where a company spends an amount in excess of requirement provided under sub-section (5) of section 135, such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years subject to the conditions that –
 - the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of this rule.
 - the Board of the company shall pass a resolution to that effect.
- (4) The CSR amount may be spent by a company for creation or acquisition of a capital asset, which shall be held by –
 - a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number under sub-rule (2) of rule 4; or
 - beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
 - a public authority.

VI. MONITORING AND REPORTING MECHANISM

1. To ensure that the objectives of the CSR Policy are being met in an efficient and effective manner, the utilisation of the amount sanctioned towards CSR Activities should be reported by the Implementation Group to the Board as well the CSR Committee on an annual basis in such manner as the Board may direct.

2. In the event that any of the CSR Activities are undertaken through an Implementing Agency, the Implementation Group should obtain relevant information from the Implementing Agency and ensure that the progress on such CSR activities is submitted to the Board as well as the CSR Committee on an annual basis in such a manner as the Board may direct.
3. Upon receipt of such progress reports by the Implementation Group, the CSR Committee may review and deliberate upon such reports and provide such inputs or recommendations, as it may deem necessary, to the Board.
4. Notwithstanding anything to the contrary, the Board shall not be obligated to comply with the recommendations of the CSR Committee.

VII. REPORTING AND RECORD KEEPING

1. The CSR Committee shall maintain proper minutes of all its meetings.
2. The Board's report of the Company shall include an annual report on CSR containing the particulars set out in Annexure A to this CSR Policy and such other details as may be prescribed from time to time under the Act and the CSR Rules.
3. The Board will be responsible to ensure that:
 - (i) The report of the Board includes the annual report on CSR Activities of the Company and sets out the requisite information in terms of the Act and the Rules;
 - (ii) The contents of the latest and updated version of the CSR Policy is included in the report of the Board;
 - (iii) In case of failure to ensure the minimum CSR Expenditure, detailed reasons for the same are adequately disclosed in the Board Report.

VIII. AMENDMENT

The Board of the Company may, subject to compliance with applicable law, at any time alter, amend or modify the CSR Policy as it deems fit to comply with the statutory obligation of the Company to undertake the CSR Activities.

Sd/-

Chairman