

Luminous Policy

On

Corporate Social Responsibility

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1. OBJECTIVE:

To utilize the CSR funds in a few, carefully selected, impact-driven community-outreach projects and to promote a unified approach towards CSR, across all locations of Luminous.

2. VISION:

Our vision is to build *Khushiyon Ka Ghar* by helping people have access to basic Health-care, enriching Education, better Employability, and a clean Environment to live in.

3. THE FOUR PILLARS OF LUMINOUS CSR POLICY:

The scope of CSR work is vast and there is a lot that can be done to improve living-conditions of various target groups. We do, however, realise that for the desired impact, there has to be a proper planning and identification of focus group and areas, for proper utilization of the CSR funds. Thus, Luminous has identified four pillars of its CSR efforts as - Education, Elementary Health-care, Employability and Environment.

3.1. Education

3.1.1 Mission statement – To provide educational support to meritorious children (90% girls), from financially poor families, in the rural districts surrounding our plants, starting from class 9th and till they finish class 12th, when the drop-out rate amongst girls is very high.

3.1.2 Project details – Luminous shall partner with NGOs working in the field of girl-child education and focusing on rural areas, to ensure that the meritorious girl-students, studying in government schools, who desire to continue their education, are provided the support that they need, which their parents are unable to provide. The aim is to help maintain these young girls in the mainstream education and help them realise their ambition. Also, it is a well-established sociological fact that when you educate a girl-child, you educate a future family. This will improve the level of all round awareness at the very grass roots and lead to development right where it is needed most. The support provided under this project includes:

- (a) Scholarships to minimize financial constraints
- (b) Quality out-of-school coaching with periodic evaluation of their progress
- (c) Nutrition support – in the form of additional snacks provided and periodic monitoring of their nutritional levels
- (d) Training in soft skills, one on one career guidance sessions, goal setting, personality development workshops, sessions on social issues & their role as empowered women.

3.2. Elementary Health-care

3.2.1 Mission statement – To make elementary health-care affordable and accessible to far-flung, rural areas and economically poor families.

3.2.2 Project Details – Programmes under this pillar shall cover the following:

(a) Mobile Medical Unit (MMU) which shall travel through villages, equipped with a doctor and assistants to provide elementary healthcare

(b) Health camps for consultations on specific ailments related to diabetes, arthritis, gynecology etc. to be held once in every quarter

(c) Any community assistance during pandemics or large scale breakout of any disease

(d) Any cash or kind contribution to government efforts during pandemic

3.3. Employability

3.3.1 Mission statement – To provide skill training to women and youth to make them employable and market-ready, to harness our demographic dividend.

3.3.2 Project details – Luminous believes in development through self-reliance. A large part of our educated population does not have proper skills to make them employable. Thus, Luminous CSR project on Employability shall focus on imparting vocational skills training, as given below:

(a) Women Self-help Groups - Through training on various skills, like making papad, detergent and eco-friendly diyas, tailoring etc, Luminous shall undertake to create self-help groups of women, within rural communities, thus imparting them skills to be financially independent.

(b) Electricians' Training on Solar Equipment – There is a dearth of trained electricians in India to handle the solar installations. Considering that solar is the future of energy, Luminous CSR shall undertake to train small-town electricians across the country, to be able to handle solar equipment and installations.

3.4. Environment

3.4.1 Mission statement – To ensure that our march to development is sustainable, by investing in clean energy sources, clean and healthy environment and a responsibility towards conservation and sustainability.

3.4.2 Project details – Luminous CSR shall undertake environment projects as follows:

(a) Any project that encourages the use of solar energy

(b) Any project on water conservation, water-harvesting or provision of clean drinking water

(c) Any project on waste-management for a significant population

(d) Any project on reducing air-pollution in large cities

4. CSR COMMITTEE

4.1 The CSR Committee shall be responsible for providing recommendations to the Board with respect to CSR Projects that may be undertaken by the Company in accordance with the CSR Policy as well as the Companies Act, 2013 and the CSR Rules.

4.2 Without prejudice to the generality of the foregoing, the CSR Committee shall be responsible for the following activities:

- (i) Formulate and recommend CSR projects to the board of directors;
- (ii) Recommend amount of expenditure;
- (iii) Monitor CSR policy of the company; and
- (iv) Formulate annual action plan in pursuance of the CSR policy in accordance with the applicable law, and inclusive of the following items:
 - (a) The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - (b) The manner of execution of such projects or programmes;
 - (c) The modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - (d) Monitoring and reporting mechanism for the projects or programmes; and
 - (e) Details of need and impact assessment, if any, for the projects undertaken by the company.

4.3 The CSR Committee shall consist of at least two 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

4.4 The CSR Committee shall hold meetings which shall be attended by 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 by the members of the Committee.

4.5 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 their inputs and the final decision/determination/ interpretation shall rest with the Board.

4.6 No member of the CSR Committee shall be personally liable for any decision or action taken in good faith with respect to the CSR Policy.

4.7 The Members of the CSR Committee are:

S. No.	Name of Members	Designation
1.	Mr. Manish Pant	Chairman
2.	Mr. Vipul Sabharwal	Member
3.	Mr. Javed Ahmad	Member
4.	Mr. Brij Bhushan Nagpal	Member

5. CSR EXPENDITURE

5.1 From April 1st, 2014, in line with the new Companies Act 2013 (the Act), Luminous pledges to contribute at least 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years in accordance with the Act and the Rules and the CSR Policy.

5.2 The CSR Committee shall recommend the manner in which the CSR Expenditure shall be incurred in a year, in accordance with the Act and the Rules and the CSR Policy.

5.3 The Board shall be responsible for sanctioning the CSR Expenditure and along with the CSR Committee responsible for taking steps to ensure that the amount for the CSR Expenditure is available to the Implementation Group for application towards the CSR Activities.

5.4 Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company and may only be re-allocated to the CSR Activities being undertaken in terms of this CSR Policy and the annual action plan for the financial year in which such surplus has arisen.

5.5 In order to count towards CSR Expenditure, CSR Activities must be undertaken in compliance with the applicable laws and shall not include the following:

- i. activities undertaken in pursuance of normal course of business of the company any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
- ii. contribution of any amount directly or indirectly to any political party under Section 182 of the Act;
- iii. activities benefitting employees of the company as defined in clause (k) of Section 2 of the Code on Wages, 2019 (29 of 2019);
- iv. activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services; and
- v. activities carried out for fulfilment of any other statutory obligations under any law in force in India.

5.6 The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.

5.7 The CSR amount may be spent by the Company for creation or acquisition of a capital asset, which shall be held by –

- vi. A company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number.
- vii. Beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
- viii. A public authority

Provided that any capital asset created by the Company prior to the commencement of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, shall within a period of one hundred and eighty days from such commencement comply with this requirement, which may be extended by a further period of not more than ninety days with the approval of the Board based on reasonable justification

6. MONITORING PROCESS & MECHANISM:

- 6.1 To ensure that the objectives of 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 CSR Team to the CSR Committee in such manner as the CSR Committee may direct.
- 6.2 In the event any of the CSR Activities are undertaken through an Implementing Agency, the CSR Team should obtain relevant information from the Implementing Agency and ensure that the progress on such CSR Activity is submitted to the CSR Committee in such manner as the CSR Committee may direct.
- 6.3 For the purposes of monitoring, the CSR Team may visit the Implementation Agency site to review CSR project and carry out inspections as recommended by the CSR Committee from time to time.
- 6.4 Upon receipt of such progress report by the CSR Team, the CSR Committee may review and deliberate upon such reports and provide such inputs or recommendations, as it may deem necessary, to the Board.
- 6.5 Notwithstanding anything to the contrary, the Board shall not be obliged to comply with the recommendations of the CSR Committee.

7. APPROVAL PROCESS

7.1 Approval for Project / Partner Selection

Following approval process shall be followed for all project / partner selection, under this policy:

Step 1 – The CSR team, including the SPOCs at plants, shall explore various viable programmes under the four pillars of the CSR Policy.

Step 2 – Various programmes shall be discussed within the CSR team for its merits, vis a vis, adherence to CSR policy pillars, impact, feasibility, and budget.

Step 3 – Once a theme is identified and selected, the CSR team shall look for various partners (three or more), eligible to run the programme

Step 4 – The CSR team shall suggest three suitable and eligible partners to the NPP, along with a detailed scope of the project and partner KPIs

Step 5 – Basis the scope of work, the NPP team shall finalise a partner and the budget for the programme and inform the CSR Manager

Step 6 – CSR Manager shall take the HR Head’s approval for the new programme / new partner

Step 7 – CSR Team will present the detailed presentation to CSR Committee and based on recommendations of CSR Committee, Board of Directors approve the project & programs

Step 8 – On Board approval, a contract shall be drawn up by the Legal team, and signed by the company and the implementation partner

Step 9 – Once the contract is signed, the advance payment request shall be shared with Accounts team, by the CSR Manager

Step 10 – CSR Manager will ensure training of partner’s team on the dashboard, to record and monitor the programme implementation.

8. 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.

9. POLICY EXCEPTION:

Any exception to the policy would have to be approved by the Board of Directors.

Disclaimer: The Management reserves the right to alter, modify, change or withdraw this policy at any time at its sole discretion.

*****END OF DOCUMENT*****

Annexure 1

(Annual Action Plan for Corporate Social Responsibility for the FY 2021-22)

Theme	Project Name	Location	Implementation Agency / NGO Partner	Category under Schedule VII
Education	LAMP	Gagret (Himachal Pradesh)	Ankur Welfare Society	1 & 2
		Baddi (Himachal Pradesh)	Udayan care	2
		Hosur (Tamil Nadu)	ARCOD	2
		Dewas (Madhya Pradesh)	SSISM	2
		Saharsa (Bihar)	Happy Horizon Trust	2
	School Infra Development	Gagret (Himachal Pradesh)	SEED	2
Elementary Health Care	LAHI	Gagret (Himachal Pradesh)	Helpage India	1
	COVID- 19 Prevention & Care	Gagret (Himachal Pradesh)	Contributions to various relief funds and hospitals around our areas of operation	1,8 & 12
		Baddi (Himachal Pradesh)		
		Hosur (Tamil Nadu) Head Office		
Employment and Employability	Self Help Group	Gagret (Himachal Pradesh)	Ankur Welfare Society	2 & 3
	Solar Training	Pan India	Lok Bharti	2
Environment	Solar light and Solar Panel Installations	Baddi & Gagret (Himachal Pradesh), Hosur, (Tamil Nadu)	Victory India National Org	4
Admin	Dashboard Tool	Head Office	Super Human Race Pvt. Ltd.	-