

Luminous Policy On Corporate Social Responsibility

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1. OBJECTIVE:

The policy aims to provide for the following:

- (a) Establishing a guideline for compliance to commit a percentage of company's profits for social projects.
- (b) Ensuring the implementation of CSR initiatives with proper procedures and reporting in place.
- (c) Creating opportunities for employees to participate in social initiatives.

The policy is aligned with Section 135 of the Companies Act 2013 and such other rules, regulations, circulars, and notifications as maybe applicable and as amended from time to time

2. VISION:

Our vision is to empower underserved local communities by providing education, vocational training, and renewable energy solutions. We strive to integrate these communities into the mainstream economy while collectively working towards a sustainable future with reduced carbon footprints.

3. MISSION:

Our mission is to leverage our resources and expertise in renewable energy sector to drive sustainable development and positive social impact in the communities we serve. We are committed to acting with responsibility in supporting local economies and promoting environmental stewardship while fostering a culture of empathy and engagement among our employees. Together, we strive to create a better future for all stakeholders through collaboration, innovation, and respect for diversity.

4. THEMATIC AREAS 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, realize that for the desired impact and for proper utilization of the CSR funds, there must be planning and identification of focus groups and areas. Luminous has identified three pillars of its CSR strategy as –

Education & Employment, Environment and Electrification (through Solar)

4.1 Education & Employment: Our CSR is focused on uplifting rural communities by providing access to quality education and fostering sustainable growth, recognizing education as a powerful catalyst for change and development. We also aim to address the skill-gaps by equipping individuals with employable skills, particularly in the renewable energy sector. As the world shifts towards sustainable energy, our goal is to prepare local talent to meet the demands of this evolving industry, ensuring they can thrive in a greener future.

- (a) Luminous Advanced Mentoring Program (LAMP): Luminous partners with NGOs working in the field of education and focusing on rural areas, to ensure that the students, studying in government schools, who desire to continue their education, are provided the support which their parents are unable to provide. The aim is to help maintain these young students in the mainstream education and

help them to realize 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 project aims at a holistic development of beneficiaries of this project. The support provided under this project include:

- Scholarships to minimize financial constraints
- Quality out-of-school coaching with periodic evaluation of their progress
- Nutrition support – in the form of additional nutrition such as seasonal fruits provided
- Training in Soft Skills, Digital Literacy, Adolescent Health Awareness, Environmental Awareness, One-on-one career guidance sessions.

(b) STEM Scholarship: This initiative aims to provide financial support and mentorship to deserving students from underserved communities, focusing mainly on females, enabling them to pursue higher education in STEM fields. The objective of this project is to increase the numbers of female in STEM fields. By investing in their education, we are not only fostering individual potential but also contributing to the development of a skilled workforce that can tackle the challenges of tomorrow.

(c) Impact Funding to research organizations/engineering institutes: The Renewable Energy Impact Funding Project aims to support initiatives that harness renewable energy sources—such as solar, thereby reducing reliance on fossil fuels and minimizing environmental impact with renowned institutions. Our funding seeks to empower communities and enhance energy security while contributing to global efforts to combat climate change.

(d) Solar PV Installation Training (NSDC Certified): Training the rural youth on Renewable Energy. There is a dearth of trained Solar technicians in India to handle the solar installations. Considering that solar is the future of energy, Luminous CSR undertakes to train rural/semi urban youth across the country, to be able to handle solar equipment installations & maintenance.

(e) Solar Smart Class: Installation of Solar Smart Classrooms to improve educational infrastructure while promoting sustainable energy use in schools through solar-powered learning systems. Project also includes training teachers from the same schools to ensure better adoption and sustainability of the project.

4.2 Environment-Luminous Initiatives for Environment (LIFE) - Our environmental commitment is rooted in the belief that businesses have a responsibility to protect the planet. We strive to minimize our ecological footprint while promoting sustainable practices that benefit both the environment and the society.

- (a) Any project that enhances the green cover
- (b) Any project that encourages the use of solar energy
- (c) Any project on water conservation, water-harvesting or provision of clean drinking water
- (d) Any project on waste-management for a significant population
- (e) Any project on reducing air-pollution in large cities

(f) We conduct energy literacy awareness sessions, and this initiative is to equip participants with the knowledge and skills necessary to make informed decisions about energy use. By promoting awareness and understanding of energy issues, we empower communities to adopt sustainable practices that benefit both their households and the environment.

4.3 Electrification (through solar) -Luminous Energy Accessibility for Development (LEAD): Our solar electrification initiatives are designed to provide clean, affordable, and reliable energy to households that lack access to traditional power sources. By leveraging solar technology, we strive to empower communities, reduce reliance on fossil fuels, and contribute to global efforts to combat climate change.

(a) Addressing the issue of access to clean energy which is crucial for sustainable development and improving the quality of life for underserved communities. Enabling the local women to earn livelihood by installing & servicing solar equipment.

(b) Initiative of installing 'one room of solar' which makes it easy for people to start their solar journey by solar powering one room in their house, schools, colleges or commercial organization.

(c) To enable and empower the community with the power of energy and internet connectivity. Making the education content readily available and accessible to the school going beneficiaries. Empower communities to break the cycle of poverty by leveraging technology, such as tablets with internet connectivity, to enhance access to educational resources, vocational training, and employment opportunities.

(d) Our solar street light initiatives are designed to improve public safety and visibility while reducing reliance on conventional electricity sources. By installing solar-powered lights, we contribute to creating safer, more vibrant neighborhoods and promoting sustainable energy use.

5. Roles & Responsibility of CSR COMMITTEE

5.1 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.

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

- (a) Formulate and recommend CSR projects to the Board of Directors;
- (b) Propose the CSR budget for the year;
- (c) Monitor CSR policy & its implementation; and
- (d) Formulate annual action plan in pursuance of the CSR policy and in accordance with the applicable laws, inclusive of the following items:
 - i) List of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - ii) Manner of execution of such projects or programs;
 - iii) Modalities of utilization of funds and implementation schedules for the projects or

- programmes;
- iv) Monitoring and reporting mechanism for the projects or programmes; and
 - v) Details of need and impact assessment, if any, for the projects undertaken by the company.

5.3 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 laws.

5.4 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 by the members of the Committee. The CSR Board meeting is held annually and reconvenes as needed.

5.5 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.

5.6 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.

5.7 The composition of the CSR Committee is as given below:

S. No.	Name of Members	Designation
1.	Mr. Pankaj Sharma	Chairman
2.	Ms. Preeti Bajaj	Member

6. CSR EXPENDITURE

6.1 Luminous commits 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.

6.2 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.

6.3 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.

6.4 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.

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

- (a) activities undertaken in pursuance of normal course of business of the company
- (b) 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;
- (c) contribution of any amount directly or indirectly to any political party under Section 182 of the Act;
- (d) activities benefitting employees of the company as defined in clause (k) of Section 2 of the Code on Wages, 2019 (29 of 2019);
- (e) activities supported by the company on sponsorship basis for deriving marketing benefits for its products or services; and
- (f) activities carried out for fulfilment of any other statutory obligations under any law in force in India.
- (g) The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.

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

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

6.7 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.

7. MONITORING PROCESS & MECHANISM:

7.1 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.

7.2 In the event any of the CSR Activities are undertaken through an Implementing Agency (NGO/NPO/PO),

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.

- 7.3 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.
- 7.4 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.
- 7.5 Notwithstanding anything to the contrary, the Board shall not be obliged to comply with the recommendations of the CSR Committee.

8 APPROVAL PROCESS 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 three 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 (NGO/NPO/For Profit), eligible to run the programme

Step 4 – The CSR team shall suggest 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 or look for one, if CSR Team has not been able to find such partners. The cost of running the programme shall be negotiated and finalised by NPP in due consultation with the CSR Team. Any deviation to this process shall have to be approved by the CHRO.

Step 6 – CSR Manager shall take the CHRO'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 shall 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 and exchanged with partner, the IP shall ask for the advance according the payment schedule, Next instalments are to be released as per the terms mentioned in the agreement and once the documents are verified by the accounts team

based at different location.

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

9 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.

10 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*****

(Annual Action Plan for Corporate Social Responsibility for the FY 2025-26)

Theme	Project Name	Location	Implementation Agency / NGO Partner	Category under Schedule VII
Education & Employability	LAMP	Gagret (Himachal Pradesh)	Ankur Welfare Society	2
		Baddi (Himachal Pradesh)	Udayan care/Ankur Welfare Society	2
		Hosur (Tamil Nadu)	ARCOD	2
		Haridwar (Uttarakhand)	Happy Horizon Trust	2
		Rudrapur (Uttarakhand)	To be decided	2
		Gurugram	Harmony House	2
	STEM Scholarship	Pan India	Shooting Stars Foundation	2
	Impact Funding	Roorkee, Haridwar	IIT Roorkee	9 (a) (b)
	Solar PV Training	Pan India	SSRDPT	2
	Energy Literacy Training	Pan India	Energy Swaraj Foundation	4
Solar Smart Class	Haridwar & Rudrapur (Uttarakhand)	SSRDPT	1 & 4	
Environment	LIFE Project	Baddi & Gagret (Himachal Pradesh), Hosur (Tamil Nadu), Haridwar & Rudrapur (Uttarakhand) Gurugram (Haryana)	Green Dream Foundation	4

	Energy Literacy Training	Pan India	Energy Swaraj Foundation	4
Electrification through Solar	RRF project	Rajasthan & Assam	Royal Rajasthan Foundation	4
	Reeva	Uttarakhand, UP & Tamil Nadu	R2V2	4
	Ek Kamra Solar Ka	Pan India	Energy Swaraj Foundation	4
	Solar Street Lights	Baddi & Gagret (Himachal Pradesh), Hosur, (Tamil Nadu), Haridwar, Rudrapur (Uttarakhand) and Gurugram	Meera maa	4
Admin	Dashboard Tool	Head Office	Super Human Race Pvt. Ltd.	-

