

Corporate Social Responsibility Policy

TABLE OF CONTENTS		
1.	INTRODUCTION	2
2.	OBJECTIVES	2
3.	DEFINITIONS	2
4.	ROLE OF THE COMMITTEE	2
5.	ROLE OF THE BOARD	3
6.	EXPENDITURE ON CSR ACTIVITIES	4
7.	ANNUAL ACTION PLAN	5
8.	IMPLEMENTATION OF CSR ACTIVITIES	5
9.	MONITORING AND ADMINISTRATION	6
10.	DELEGATION	7
11.	REVIEW, LIMITATION AND AMENDMENT	7
12.	SCHEDULE I	8

1. INTRODUCTION

This Corporate Social Responsibility (CSR) Policy pursuant to the provisions of Section 135 of Companies Act 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, from time to time.

The Board of Directors adopted this revised Corporate Social Responsibility Policy, as formulated and recommended by the Corporate Social Responsibility Committee, on August 28, 2021.

2. OBJECTIVES

The objective of this Policy is to set guiding principles for carrying out CSR activities by the Company and to set up process of execution, implementation and monitoring of the CSR activities to be undertaken by the Company.

3. DEFINITIONS

All the terms used in this Policy, unless the context otherwise requires, shall have the same meaning as defined under applicable provisions of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, including any modifications, amendments, or re-enactment thereof.

4. ROLE OF THE COMMITTEE

The Committee shall carry out of the following functions:

- (a) formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII;
- (b) formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely:
 - i. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - ii. the manner of execution of projects or programmes;
 - iii. the 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;
- (c) monitor the CSR Policy of the Company from time to time;
- (d) ensure compliance of CSR Policy and the Rules;
- (e) such other functions as may be delegated and/or assigned by the Board from time to time.

5. ROLE OF THE BOARD

The Board of Directors of the Company will be responsible for:

- (a) Approval of the CSR Policy of the Company based on the recommendations of the CSR Committee.
- (b) Approve the annual action plan on CSR and alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.
- (c) Disclosing the content of the Policy in its report and place the Policy on the Company's website in such a manner as prescribed under Section 135 of the Companies Act 2013 read with the Companies (Corporate Social Responsibility Policy) Rules.
- (d) Disclosing the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website.
- (e) Ensuring that the activities included in the Policy are undertaken by the Company itself or through an agency and monitor the implementation of the projects with reference to the approved timelines and year-wise allocation.
- (f) Ensuring that the Company spends, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years in pursuance of the Policy.
- (g) Ensuring that the funds so disbursed have been utilised 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. Such certification based on the utilisation report as received from the implementing agencies where the CSR project are being implemented through such agencies.
- (h) Ensuring that the Company gives preference to the local areas around its operations for spending the amount earmarked for CSR projects.
- (i) Ensuring that it specifies the reasons in its report for not spending the earmarked amount in case the Company fails to spend such amount and, unless the unspent amount relates to any ongoing project, transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- (j) Ensuring that the administrative overheads shall not exceed five percent of total CSR

expenditure of the company for the financial year.

- (k) Review the impact assessment reports, as applicable to Companies having average CSR obligation of ten crore rupees or more, and such report shall also form part of the CSR Annual Report.

6. **EXPENDITURE ON CSR ACTIVITIES**

The Company shall spend in every financial year at least 2% (two percent) of the average Net Profits of the Company made during the three immediately preceding financial years or such other amount as may be notified from time to time, in accordance with the approved CSR Policy and Annual Action Plan.

The amount available for the Annual CSR Budget, shall be primarily used towards the activities/areas as detailed in **Schedule I**.

The CSR Activities shall be undertaken only in India for the benefit of the public and not only for the employees of the Company and their family. Provided that preference shall be given to the local areas and areas where the Company operates for undertaking the CSR Activities.

Any surplus arising and/or additional revenue generated out of CSR Activities undertaken by the Company shall not form part of the business profit of the Company and the same shall be ploughed back into the same project or shall be spent in pursuance of this CSR Policy and the annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII of the Act within a period of six months of the expiry of the financial year.

Excess spending:

Where the Company spends an amount in excess of CSR obligation required under the Act, subject to passing of board resolution, such excess amount, excluding surplus arising, can be set-off against the CSR spends up to immediate succeeding three financial years.

Under spending:

The unspent CSR amount pertaining to an annual CSR project shall be transferred to any fund included in Schedule VII of the Act such as Prime Minister's National Relief Fund, Swachh Bharat Kosh or any other fund specified by Central Government in this regard under the Act, within 6 (six) months from the end of concerned financial year.

If the unspent CSR amount pertains to an Ongoing CSR Project, the amount has to be transferred to a separate bank account to be called as "Unspent CSR Account" within 30 (thirty) days of the end of the concerned financial year and is to be spent on CSR

obligations as per its CSR policy within a period of 3 (three) financial years.

In case the Company is unable to spend the CSR obligation on the Ongoing CSR project within the prescribed period of 3 (three) financial years, it would be required to transfer the amount so unspent to any fund included in Schedule VII of the Act within 30 (thirty) days of the end of the concerned financial year.

7. ANNUAL ACTION PLAN

The CSR Committee shall formulate the annual action plan, in each financial year, and recommend the same to the Board.

The CSR Committee and the Board shall adhere to the following guidelines while formulating/approving the annual action plan for each financial year:

- the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- the manner of execution of projects or programmes;
- the modalities of utilization of funds and implementation schedules for the projects or programmes;
- monitoring and reporting mechanism for the projects or programmes; and
- details of need and impact assessment, if any, for the projects undertaken by the Company;

Any amendment to the annual action plan shall be recommended by the CSR Committee and approved by the Board, based on the reasonable justification to that effect.

8. IMPLEMENTATION OF CSR ACTIVITIES

- (a) The Company may itself undertake CSR activities as per its CSR Policy, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business;
- (b) The Company may implement the identified CSR Activities/Projects through an Agency, provided the activities pursued by the Agency are covered within the scope and ambit as detailed in Schedule I read with Schedule VII of the Act.

Provided, the modalities of utilization of funds and reporting mechanism on such Projects shall be reviewed by the Company periodically by the Committee or Board.

- (c) Need based assessments and monitoring will be conducted before the commencement of and/or during the implementation of the projects. Monitoring process will ensure that all allocated CSR corpus is spent for only the intended purpose within the approved timelines.

- (d) The Company may collaborate with other companies for undertaking the CSR Activities subject to fulfillment of separate reporting requirements as prescribed in the Rules.
- (e) Any contribution made by the Company, directly or indirectly to any political party under Section 182 of the Act, shall not be considered as CSR activity.

9. MONITORING AND ADMINISTRATION

- i. The Board of Directors of the Company will review the CSR implementation every year including the ongoing projects as per the applicable provisions of the Act.
- ii. The Board of a company shall satisfy itself that the funds so disbursed for CSR activities 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.
- iii. The Company shall include in its Annual Report the CSR activities / project undertaken by the Company including the progress thereof. Mandatory additional disclosures regarding amount available for set-off, CSR amount spent against ongoing project, administrative overheads, unspent amount against ongoing project, details regarding capital assets to be made in the Annual Report.
- iv. Further if the Company is having an average CSR obligation of ten crore rupees or more (or any other amount as may be specified in the Act from time to time) in pursuance of sub-section (5) of section 135 of the Act, in the three immediately preceding financial years, Company shall undertake impact assessment, through an independent agency, in respect of all of the CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.
- v. The impact assessment reports as stated above shall be placed before the Board and shall be annexed to the annual report on CSR.
- vi. The CSR Committee may require situational analysis, needs assessment surveys, field visits and impact assessment studies of its CSR projects to be carried out by External Agencies / Third party Agency, if required, especially for high value or strategic CSR programmes. Utilization Certificate along with statement of expenditure duly certified by the Statutory Auditor, if any, of the said organization / Institution/agency to whom CSR fund is allocated will be submitted the Company.
- vii. To undertake the above activities Board may delegate the power of execution to persons/officers of the Company.

10. DELEGATION

The Board of Directors may delegate any of the roles, powers and responsibilities of the Board, as contained in the policy including the power of execution of projects and programmes, to any

of the Directors and/or officers of the Company, so far as they are not inconsistent with the applicable provisions of the Companies Act, 2013 and the rules made thereunder.

11. REVIEW, LIMITATION AND AMENDMENT

The CSR Committee or Board of Directors shall review and monitor from time to time the implementation of this Policy to ensure its effectiveness and may also recommend changes pursuant to any changes in any law, for the time being in force, to ensure it meets the requirements of legislation and the needs of organization.

In the event of any conflict between the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, from time to time (“Regulations”) and the provisions of this policy, the Regulations shall prevail over this policy.

Any subsequent amendment/modification in the Regulations, in this regard shall automatically apply to this policy.

SCHEDULE I

AREAS OF FOCUS AND ACTIVITIES

A. HUNGER, POVERTY, MALNUTRITION, SANITATION AND HEALTH:

- 1) Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation, and making available safe drinking water;
- 2) Free distribution of food to poor and needy persons;
- 3) Directly or indirectly carrying out awareness programs on preventive healthcare and sanitation on the lines of Swachh Bharat Abhiyan;
- 4) Contributions to Section 8 Companies, Registered Trusts & Societies, established for eradication of hunger, poverty and malnutrition for poor.
- 5) Providing medical assistance to poor or needy persons through any kind of assistance, monetary or otherwise, including contribution towards medical expenses, treatment, medicines, etc.
- 6) Donations or support to Hospitals, Dispensary, Diagnostic Centers, Medical Camps health check-up camps and towards any other similar activities;
- 7) Direct or indirect contribution of any kind towards the establishment/running of Hospitals, Dispensary, Diagnostic Centers, Medical Camps, health check-up camps and towards any other similar activities; and
- 8) Contribution to the Swachh Bharat Kosh set up by the Central Government for the promotion of sanitation;

B. EDUCATION AND EMPLOYMENT:

- 1) Promoting education, including special education and employment-enhancing vocational skills especially among children, women, elderly and the differently abled;
- 2) Promoting livelihood enhancement projects;
- 3) Monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies;
- 4) Promote Computer literacy and technology assisted learning;
- 5) Promote enterprise development with special focus on MSME's;
- 6) Vocational/Technical/Professional training to youth through operation of learning centers and other means;
- 7) Setting up of research centers in college and universities;
- 8) Provision of uniforms, books, stationery, computer & Laboratory equipment's and other infrastructural facilities, to schools, colleges, universities, etc.

- 9) Scholarships/fellowships to deserving students to encourage education.
- 10) Construction/repair of school, college & other educational buildings & facilities including special education facilities; and
- 11) Promoting Technical/Professional education by giving financial assistance to the Organizations or through infrastructural support.
- 12) Supplement different educational and employment programmes of Central and State Governments and to contribute towards nation building.

C. WOMEN, CHILDREN & SENIOR CITIZENS:

- 1) Promoting gender equality and empowering women by promoting vocational trainings, skill development, establishment of self-help groups, entrepreneurship programs, etc.;
- 2) Setting up/running/support to homes, hostels and day care centers for women, children and orphans either directly or indirectly;
- 3) Setting up/running/support to care homes and such other facilities for senior citizens and destitute either directly or indirectly; and
- 4) Adopting measures for reducing inequalities faced by socially and economically marginalized groups.

D. ENVIRONMENT:

- 1) Taking suitable measures towards environmental sustainability;
- 2) Ecological balance, protection of flora and fauna, animal welfare;
- 3) Agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water; and
- 4) Contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.

E. NATIONAL HERITAGE, ART AND CULTURE:

- 1) Protecting national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; and
- 2) Setting up public libraries; promoting and developing traditional arts and handicrafts.

F. ARMED FORCES:

- 1) Measures for the benefit of armed forces, veterans, and their families;
- 2) Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows
- 3) Contribution towards upliftment of war widows and their dependents;

- 4) Providing free education/scholarship to the children of martyred officers of the armed forces; and
- 5) Contributions to the funds set up by Armed forces or for their benefit.

G. SPORTS:

- 1) Contributions towards development of various sports in rural areas;
- 2) Training of Paralympic and Olympic sports persons; and
- 3) Promoting rural sports and other nationally recognized sports.

H. DONATIONS/CONTRIBUTIONS

- 1) 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 such other fund as may be notified for CSR by Central or State Government(s);
- 2) Contribution to any other fund set up by the Central or State Government(s) for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- 3) Contributions to Registered Trusts, Societies and Section 8 Companies established for carrying out activities in any of the specified areas under Schedule VII of the Act;
- 4) Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government; and
- 5) 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 Organization (DRDO), 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)

I. RURAL DEVELOPMENT PROJECTS:

Strengthening rural areas by contributing towards improving accessibility, housing, drinking water, sanitation, healthcare, education, power, livelihoods and other basic necessities thereby creating sustainable villages.

J. SLUM AREA DEVELOPMENT:

- 1) Focus on developing slum areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods; and
- 2) Providing free education to the Children of slum.

K. DISASTER MANAGEMENT:

Disaster management, including relief, rehabilitation and reconstruction activities in the affected areas across the Country.

The above list of activities is illustrative and not exhaustive. The CSR Committee may consider CSR activities not falling in the above list subject to the condition that such activities relate to the subjects enumerated in Schedule VII of the Act.