

AXIS TRUSTEE SERVICES LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Recommended for review and approval



Ketki Joshi & Anuja Prabhughate
Chief of LCS & Chief of HR & Accounts



Axis Trustee Services Ltd.,

Approved by Board of Directors/Committee

On: 13.07.2022



Authorized Signatory



Corporate Identity Number : U74999MH2008PLC182264 | MSME Registered UDYAM MH-190046029

Registered Office :

Axis House, Bombay Dyeing Mills Compound, Pandurang Budhkar Marg, Worli, Mumbai - 400 025

Corporate Office:

The Ruby, 2nd Floor, SW, 29 Senapati Bapat Marg, Dadar West, Mumbai - 400 028

Tel No.: 022-62300451 Fax No.: 022-6230 0700 Website: www.axistrustee.in



AXIS TRUSTEE

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. INTRODUCTION

Axis Trustee Services Limited ('ATSL' or 'the Company') recognizes the importance of good Corporate Governance and Corporate Social Responsibility (CSR) in promoting and strengthening the trust of its shareholders and other stakeholders.

The CSR Policy shall be guided by the Company's corporate vision and the aspiration to be the Trustee of Choice for Customers and Community.

The Company's CSR Policy has been framed and adopted in accordance with Section 135 of the Companies Act, 2013 (including amendments thereof) read with the Companies (CSR Policy Amendment) Rules, 2021 (the Rules) and Schedule VII of the Act and the Rules framed thereunder. The CSR Policy sets out the approach and direction given by the Board of Directors (the Board) of the Company, as per the recommendations of the CSR Committee (CSR Committee), and includes guiding principles for selection, implementation and monitoring of CSR Project(s)/Program(s) and formulation and adoption of the Annual Action Plan (AAP) in respect of CSR Project(s)/Program(s) to be undertaken/ supported by the Company.

The Policy shall apply to all CSR programs/activities undertaken by the Company or executed through Axis Bank Foundation or through any other Trust/Society or any other implementation partner or any other fund set up by the Government and approved by the Board of Directors of the Company.

Axis Bank Foundation (Implementing Agency of Axis Trustee Services Limited):

Axis Bank Foundation (ABF) was established by Axis Bank Limited in 2006. Axis Bank Foundation has been registered as a Trust since 2006 under the Bombay Public Trust Act 1950 and is governed by a Board of Trustees and managed by a team with the required expertise. The Trust is registered under 12 AA and 80 G of the Income Tax Act 1962. As per the stipulations in the new Rules, Axis Bank Foundation is required to register with the Central Government and obtain the CSR Registration number.

As such, ABF is equipped to implement CSR project(s) in all themes as listed in the Schedule VII of the Companies Act 2013 and the Rules framed thereunder.

Review Period : Annual

Regulatory Requirements References

- a) Companies Act, 2013 ("the Act")
- b) Companies (Corporate Social Responsibility Policy) (Amendment) Rules, 2014
- c) Schedule VII of the Act, 2013

Policy Administration

The primary ownership of the Policy is with the Secretarial Dept. The responsibility of its implementation lies jointly with the Secretarial Dept. and Chief of HR & Accounts.

2. DEFINITIONS

- a. **Administrative Overheads** means the expenses incurred by the Company for 'general management and administration' of Corporate Social Responsibility functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring and evaluation of a particular Corporate Social Responsibility project or programme;



- b. **CSR Policy** means a statement containing the approach and direction given by the Board of the Company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the Annual Action Plan;
- c. **Net Profit** means net profit of the company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:
 - (i) Any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
 - (ii) Any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act
- d. **Ongoing project** means a multi-year project undertaken by a Company in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include 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.

3. CSR PURPOSE STATEMENT

The primary purpose of the Company's CSR philosophy is to make a meaningful and measurable impact in the lives of economically, physically and socially challenged communities of the country at large by supporting initiatives aimed at creating conditions suitable for sustainable livelihood in these communities. The Company shall also promote initiatives that preserve, restore and enhance environment, ecological balance, and natural resources, and improve sanitation and hygiene.

4. CSR FOCUS AREAS

The Company may support programs and activities in the following areas. The broad program areas under CSR focus areas are given in the Annexure to this Policy.

1. To create meaningful socio-economic impact in the lives of vulnerable and underprivileged sections of the society that include amongst others, differently-abled, street children, destitute women, children of sexually exploited women, economically weaker sections and victims of natural and other disasters including war and acts of terrorism.
2. To enhance sustainable livelihood through interventions in the areas of natural resource management, agriculture, horticulture and livestock development, rural development, traditional arts and handicrafts, micro-enterprise, vocational training and skill development.
3. To promote measures to eradicate hunger, poverty and malnutrition, and to promote preventive health care and sanitation.
4. To promote education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently-abled, and livelihood enhancement projects. This would also include initiatives to promote financial literacy, consumer education and awareness, and capacity and skill building in various sectors of the economy in alignment with the various Government initiatives.
5. To promote environmental sustainability, ecological balance and conservation of natural resources and maintaining quality of soil, air and water through various initiatives such as resource conservation, renewable energy and energy efficiency.



amongst others.

6. To contribute to the Prime Minister's National Relief Fund or any other fund set up by the Government for socio-economic development.

5. CSR BUDGET

The Company remains committed to spend in each financial year, the mandatory 2% of the average net profits of the preceding three financial years as calculated under the provisions of Section 198 of the Companies Act 2013 or any other amount as may be prescribed from time to time under Companies Act / Circulars etc. for undertaking CSR Project(s)/Program(s) as set out in the CSR Policy.

1. The CSR Committee may take into account the recommendations of the Companies Management and CSR Committee whilst finalizing the amount(s) allocated for the individual Project(s)/Program (s) to be undertaken by the Company during a financial year and will be included in the Annual Action Plan.
2. In the event the Company fails to spend the mandated amount for CSR Project(s)/Program(s) in any financial year, the reasons should be specified in its CSR Report forming part of the Company's Annual Report, and ensure the transfer of the unspent CSR funds to the Unspent CSR Account or to a Fund(s) included in Schedule VII of the Companies Act 2013 for Ongoing and Other than ongoing CSR projects, respectively, within the timelines stipulated in the Rules.
3. In the event the Company expends an amount for CSR Project(s)/Program(s) in excess of the spending requirement of the Company in a financial year, the CSR Committee may recommend to the Board setting off the excess amount against the CSR spending requirement of the Company for the 3 immediate succeeding financial years, subject to the conditions mentioned in the Rules.
4. The Company shall ensure that surpluses, if any, arising out of its CSR Project(s)/Program (s) shall not form part of the business profit of the Company and shall be ploughed back to the respective Project(s)/Program(s).
5. The CSR Committee will abide by the provisions relating to annual expenditure on CSR activities as laid down in Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.

6. ONBOARDING OF IMPLEMENTATION PARTNERS

1. The Company may undertake the CSR activities either directly/ indirectly or through Axis Bank Foundation (ABF) and/ or through any other eligible Implementation Partner(s), in accordance with the extant CSR norms.
2. In line with the extant CSR norms, all the Implementation Partner(s) must register themselves with the Central Government by filing e-form CSR-1 post 1st April 2021 and remain fully compliant with applicable regulations.
3. The Board shall review the recommendations made by the CSR Committee, with regards to the CSR Project(s)/Program(s) proposed to be undertaken/supported by it, under the AAP.
4. The Board may consider and approve the amendments/additions proposed to the CSR Project(s)/ Program(s), which forms part of the AAP, as recommended by the CSR Committee.



5. Company may undertake/support CSR Project(s)/Program(s) or collaborate with other like-minded companies, subject to the approval of the CSR Committee and the Board of the Company.
6. All CSR Project(s)/Program(s) ('Ongoing' and/or 'Standalone'), shall be considered as have been undertaken/ supported by the Company, subject to its review and approval by the CSR Committee and the Board, and its incorporation in the AAP.

7. MONITORING MECHANISMS

The Company shall monitor the following aspects from a regulatory as well as good governance perspective.

1. Every entity that intends to engage with Company for undertaking CSR Project(s)/Program(s) has registered itself with the Central Government by filing the Form CSR-1 electronically with the Registrar, post 1st April 2021;
2. Objectives for each Project/Program are developed out of societal needs and are in line with the CSR Policy of the company.
3. The Company shall take updates of activities of Axis Bank Foundation or any other Implementing Partner(s) engaged by the Company for the said CSR Project(s)/Program(s). The updates may include reports / photographs of the projects submitted by Axis Bank Foundation or any other Implementing Partner(s) and develop taking into account. Such mechanism shall be developed taking into account the size, extent and intended impact of the said CSR Project(s)/ Program(s).
4. The Company shall ensure that relevant documentary evidences in respect of the funds disbursed for the said CSR Project(s)/Program(s) are duly submitted by ABF or any other Implementing Partner(s) to facilitate such monitoring.

8. VALIDITY OF CSR POLICY

On the recommendation of the CSR Committee, the Board reserves the right to amend the CSR Policy as may be required from time to time.

9. EXECUTION OF CSR

The Company shall undertake CSR Project(s)/Program(s) in relation to the said areas specified in Annexure I to this Policy, either directly or indirectly, through the Axis Bank Foundation or any other implementation partner(s).

The CSR Committee shall review the recommendations made by the entity with regards to the CSR Project(s)/Program(s) proposed to be undertaken, decide the manner in which they shall be implemented and allocate adequate funds, subject to availability of net profits, to be calculated in accordance with Section 135 of the Companies Act, 2013, read with the Companies (CSR Policy Amendment) Rules, 2021 (the Rules) and Schedule VII of the Act and the Rules framed thereunder including any amendment thereof.

The CSR Committee shall ensure that only those CSR Project(s)/Program(s) are undertaken that are stated/added in the Annual Action Plan, as approved by the Board.

Company may undertake multi-year Project(s)/Program(s). Such Project(s)/Program(s) may be renewed by the entity for additional period(s) after the completion of the initial period.



depending on the impact of the Project(s)/Program(s). The company may also, if deemed appropriate, undertake other than on-going Project(s) during the year, the decision of which shall be taken on a case-to-case basis and will be subject to approval of the Board.

All CSR programs/ activities will be executed by the Axis Bank Foundation or any other Implementing Partner(s). The Company may also make contributions to any fund set up by the Government of India.

10. ANNUAL ACTION PLAN (AAP)

In alignment with the Rules, the CSR Committee shall formulate an Annual Action Plan that shall include the modalities of each CSR Project/Program that the company shall undertake in a financial year.

The CSR Committee shall, in consultation with the Company, recommend to the Board, the Annual Action Plan in pursuance of the CSR Policy as stipulated by the Rules.

11. CSR PROJECT(S)/PROGRAM(S)

The Company shall undertake CSR Project(s)/Program(s) in accordance with Schedule VII of the Companies Act 2013 and the relevant provisions of the Companies (Corporate Social Responsibility Policy Amendment) Rules, 2021, as set out in Annexure I, to this Policy.

However, it shall not undertake CSR Project(s)/ Program(s) under any of the areas which is specifically prohibited in terms of the said Rules, as set out in Annexure II, to this Policy.

12. CSR GOVERNANCE STRUCTURE

1. Roles and Responsibilities

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

- a. Approval of the CSR Policy of the Company.
- b. Disclosure of the Policy in its report and placing the same on the Company's website as prescribed under Section 135 of the Companies Act, 2013.
- c. Ensuring that it specifies the reasons in its report for not spending the earmarked amount in case the Company does not spend such amount during the financial year.
- d. Making any change(s) in the constitution of the CSR Committee as deemed suitable.
- e. Reviewing proposals for Ongoing as well as 'stand alone CSR Project(s)/Program (s) to be undertaken/supported by the Company, in terms of the CSR Policy and allocation of funds for the same
- f. Review of the Annual Action Plan in relation to the CSR Project(s)/Program(s), to be undertaken by the Company, during a financial year.
- g. Monitoring the usage of funds allocated for Ongoing/Other than Ongoing CSR Project(s)/Program(s), and satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and review and take on record the certificate issued by Implementing partner/ Axis Bank Foundation to



that effect.

- h. Such other matters as mandated under the CSR norms, as amended and notified, from time to time.

2. Frequency of Meeting of CSR Committee

The CSR Committee of the Board meets on half yearly basis to discuss and deliberate upon the CSR activities - proposed/existing, and takes account of the spends and the monitoring activities from the entities engaged to implement the CSR activities like Axis Bank Foundation.

The Ministry of Corporate Affairs (MCA) vide Notification No. GSR 409(E) dated June 15, 2021, notified the amendment in Companies (Meetings of Board and its Powers) Rules, 2014. As per the amendment, w.e.f. 15th June, 2021, all matters can now be dealt with in a meeting through video conferencing or other audio visual means.

3. The person responsible for financial/ accounting management –

The person responsible for financial/ accounting management of the Company shall certify that the funds allocated for the CSR Project(s)/Program(s) that have been disbursed as per the Board approved Annual Action Plan, have been utilized for the stated purposes and in the manner as approved.

13. REPORTING FRAMEWORK

The Company shall take updates of the activities of Axis Bank Foundation or any other Implementing Partner(s) engaged by the Company for the said CSR Project(s)/ Program(s). The updates may include reports / photographs of the projects submitted by Axis Bank Foundation or any other Implementing Partner(s) and taking into account the size, extent and intended impact of the said CSR Project(s)/ Program(s).

14. DISCLOSURES AND RELATED COMPLIANCES:

1. The company shall ensure that requisite disclosures are made in its Annual Report in the prescribed format, containing details relating to the CSR Committee, CSR spends carried forward and/or set off, and such other information, as prescribed in the Companies Act, 2013 and the Companies (CSR Policy) Rules, as amended and notified from time-to-time;
2. The Company shall perform such other duties with respect to its CSR activities as may be required under any law, statute, rules, regulations etc. as may be enacted by Government of India, or by any other regulatory/statutory authority or as mandated by the Board, from time to time.

15. AUTHORITY AND REVIEW:

This CSR Policy shall be reviewed at least once annually and/ or pursuant to any amendments to the CSR norms or for any reason as deemed appropriate by the CSR Committee/ Board.

Any amendment to the CSR Policy shall be approved by the Board.



Annexure I

An illustrative list of the CSR areas under which CSR Project(s)/Program(s) may be undertaken by ATSL, are given below:

1. Education

- a. Special education for the differently-abled: Support basic, secondary and vocational education for differently-abled children and youth. Increase outreach to the differently-abled and provide them with access to education (at the primary, secondary and higher secondary levels) and vocational training.
- b. Access to quality education for street children and children of sexually-exploited women: Provide education to street children and children of sexually exploited women and facilitate access to age-appropriate formal education and vocational opportunities.
- c. Financial literacy: Advance the agenda of Financial Inclusion by creating awareness, educating and empowering sections of society which do not have access to formal banking system through financial literacy initiatives.
- d. Consumer education and awareness: Promote financial education and awareness amongst consumers at large and school children. Disseminate knowledge on managing finances etc. to consumers at large which may include aspects of safe banking practices, tax planning, saving and investing and other relevant financial knowledge.
- e. Support MSME sector capability enhancement: Provide support to MSME sector through dissemination of knowledge leading to enhancement of sector capabilities.

2. Vocational Education and Training

- a. Support vocational education, life skill coaching and career counselling: Provide orientation and handholding support to children of secondary and higher secondary level on available career options, and employable vocational and technical skills.
- b. Skill development through vocational education and training: Provide skilling, re-skilling and multi-skilling support to youth for gainful employment.

3. Livelihood Enhancement and Rural Development

- a. Natural resource management, soil and water conservation: Management of natural resources leading to more productive outcome for agriculture, and associated livelihood. Support rural and village communities through non-farm based livelihood development.
- b. Access to finance/financial inclusion and entrepreneurship development: Support creation of sustainable income sources through micro-finance and micro-enterprise development and strengthen mechanisms for alternative livelihood.



4. **Medical Relief and Trauma Care:** The Company could work on providing medical relief and trauma care for victims of accidents through Axis Bank Foundation. It could also create a trained community of service providers who can provide immediate assistance to victims of accidents. The Company may work on such programs as part of its overall contributions towards promoting healthcare.
5. **Environmental Sustainability:** The Company is sensitive towards its role in ensuring environmental sustainability, ecological balance and conservation of natural resources and may pursue projects that conserve resources and enhance environment such as renewable energy and energy efficiency.
6. **Sanitation:** The Company may work towards improving/providing sanitation facilities for communities/schools.
7. **Reducing inequalities:** The Company may undertake activities singly and/or in conjunction with the Government initiatives and schemes to reduce inequalities faced by socially and economically backwards groups.
8. **Humanitarian Relief:** The Company may support relief efforts during natural and other calamities in India.
9. **Armed Forces Veterans:** The Company may institute a program for the benefit of armed forces veterans, war widows and their dependents, widows of armed forces injured in action.
10. **Capacity Building of Personnel and NGO Partners:** The Company may build the capabilities of its own personnel as well as that of executing and implementing agencies through training, conferences and experience sharing programmes.

➤ Further, as per Companies Act, 2013 and the rules made thereunder, following are the activities prescribed under **Schedule VII (as amended from time to time) for spending the CSR amount:**

- (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 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 govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women
 - (ix) contributions or funds provided to technology incubators located within academic institutions which are approved by the central govt.
 - (x) rural development projects
 - (xi) slum area development
(Explanation- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force)
 - (xii) disaster management, including relief, rehabilitation and reconstruction activities



ANNEXURE II:

Corporate Social Responsibility (CSR)" means the activities undertaken by a Company in pursuance of its statutory obligation laid down in Section 135 of the Companies Act, 2013, in accordance with the Rules, but shall **not** include the following, namely:-

- (i) Activities undertaken in pursuance of normal course of business of the company. However, exemption is provided for three financial years, till FY 2022-23, to companies engaged in R&D activities for new vaccines, drugs, and medical devices in their normal course of business, related to COVID19. This exclusion is allowed only in case the companies are engaged in R&D in collaboration with organisations as mentioned in item (ix) of Schedule VII and disclose the same in their Board reports.
- (ii) 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;
- (iii) Contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- (iv) Activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
- (v) Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- (vi) Activities carried out for fulfilment of any other statutory obligations under any law in force in India;



ANNUAL ACTION PLAN (AAP) OF AXIS TRUSTEE SERVICES LIMITED (THE COMPANY) FOR THE FINANCIAL YEAR 2022-23, PURSUANT TO THE CSR POLICY

1. Background:

The Corporate Social Responsibility (CSR) philosophy of **Axis Trustee Services Limited** (the Company) is to make meaningful and measurable contributions to the lives of socially, economically, financially and physically excluded, disadvantaged and challenged communities of the country.

This is proposed to be achieved through an integrated approach under which the Project(s)/Program(s) will be implemented through Axis Bank Foundation (ABF) as set out in this Annual Action Plan (AAP).

This AAP is being placed for the review of the CSR Committee and the Board of Directors (the Board) of the Company to be implemented in FY 2022-23.

This AAP details the CSR Project(s)/ Program(s) to be undertaken by the Company during the FY 2022-23, in terms of the provisions of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, as amended, from time to time (extant CSR norms).

The Project(s)/Program(s) covered in this AAP are planned to be implemented as per the approved thematic allocation for the FY 2022-23.

Approved thematic allocation:

No.	Program Theme	Allocation (%)
1	Lives and Livelihoods	100%

2. Objective:

The Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (the Rules) which was notified on January 22, 2021, has emphasized the need for formulation of a framework which would enable the Board to exercise requisite oversight on the manner in which CSR Project(s)/ Program(s) are proposed to be undertaken and administered by the Company

Towards this, the Rules have stipulated the formulation and adoption of the AAP, to be reviewed and approved by the Board, pursuant to the recommendation of the CSR Committee, which *inter alia* includes details relating to the CSR Project(s)/Program(s) to be undertaken by the Company during the FY 2022-23, manner of its execution, modalities of fund utilization, monitoring end use of CSR funds, review and reporting mechanism, CSR Project(s)/ Program(s) for which impact assessment studies are proposed to be conducted, disclosures in the Annual Report etc., set out hereinafter.

3. Formulation of AAP:

- The formulation of the AAP in respect of the CSR Project(s)/ Program(s) proposed to be undertaken/ supported by the Company during the FY 2022-23, shall be based on the recommendation of the CSR Committee of the Company, who has been entrusted with the responsibility of strategizing various CSR initiatives, in compliance with the extant CSR norms and an annual review all the Project(s)/Program(s)
- The CSR Committee may consider and approve the amendments/additions proposed to the CSR Project(s)/Program(s), which forms part of this AAP, as recommended by the Company and recommend the same for the approval of the Board.
- The Board, whilst reviewing the recommendations of the CSR Committee, shall be within its rights to make appropriate recommendations to the AAP, as deemed appropriate, and the revised AAP shall be approved, in terms of the extant CSR norms.



- d. Pertinent details of the AAP, so approved by the Board of the Company, shall be hosted on the website of the Company, in accordance with the extant CSR norms.

4. Implementation Methodology:

- a. The Company will undertake the CSR activities through its Axis Bank's nodal agency or arm viz. Axis Bank Foundation (ABF), in accordance with the extant CSR norms.
- b. ABF is registered with the Central Government by filing e-form CSR 1 and is registered under section 12A and 80G of the Income Tax Act read with any amendments thereof. These are the prerequisites for undertaking CSR project / Program.
- c. The Company may consider and approve the Ongoing CSR Project(s)/Program(s) i.e., to be implemented over a period not exceeding 4 years, including the year of its implementation and the means of funding the same, on a case-to-case basis, in line with the extant CSR norms.
- d. All CSR Project(s)/Program(s) ('Ongoing' and/or 'Standalone'), shall be considered as have been undertaken/supported by the Company, subject to its review and approval by the CSR Committee and the Board, and its incorporation in the AAP.

5. CSR Project(s)/Program(s):

The Company will undertake/support only those CSR Project(s)/Program(s) which are listed in Schedule VII of the Companies Act, 2013 including the amendments thereof and such CSR Project(s)/Program(s) shall be implemented in the manner as set out in the CSR Policy of the Company, as approved by the Board, from time to time.

The CSR Project(s)/Program(s) which are proposed to be undertaken by the Company, during the FY 2022-23, are as under:

A. CSR Project(s)/ Program(s) to be undertaken through ABF:

Thematic Area: Lives and Livelihoods

Sustainable Livelihood Program (Clauses (i), (ii), (iv), (x), (xii) of Schedule VII to the Companies Act, 2013):

The total allocation of ₹ **0.53 crore** to the thematic area of Lives and Livelihoods constitutes **100%** of the overall budget.

Through this program, the Company aims at creating and enhancing livelihoods to contribute to poverty alleviation and integrated development, especially in some of the most backward regions of the country. The program also endeavors to promote better natural resource management, income enhancement, promote community leadership, promote women empowerment, support improvement in quality of life, facilitate access to finance and access to markets and Skill Development.

The program is identified as an ongoing program and the duration of the CSR Program would be for a period of 4 years including the financial year in which the program has commenced viz. FY 2022-23 to FY 2025-26, which may be extended for such further period(s) as decided by the Board, from time to time, in pursuance to the CSR Policy of the Company.



6. CSR Spend Amount for FY 2022-23:

The estimated total CSR Budget for the CSR Project(s)/Program(s) to be spent during the FY 2022-23 aggregates to Rs. 53,24,000 (Rupees Fifty Three Lakh Twenty Four Thousand), representing 2% of the average net profits of the Company (based on estimated profits) for the preceding three financial years. The statement on the CSR Project(s)/Program(s) to be undertaken by the Company is referred to in **Point No 1 above under Approved thematic allocation** to this note.

Any allocation/re-allocation of budgets and the details of the associated project(s)/program(s) would be suitably documented in the Annual Action Plan (AAP) for the FY and presented to the Board for its approval.

7. Transfer of unspent CSR Spends:

The Company shall ensure that the CSR Funds so allocated by the Board for undertaking/supporting any "ongoing" CSR Project(s)/Program(s), under this AAP, and which remains unspent as at the end of the financial year i.e. as on March 31, 2023, is transferred to the 'Unspent CSR Account' maintained by the Company and utilized within the timelines as stipulated in the approved program complying with extant CSR norms. Ongoing CSR Project(s)/Program(s) would be those which have a multi-year commitment and whose one project year spans more than one financial year.

8. Monitoring and Reporting of CSR spends:

The Company shall periodically review the activities of the ABF engaged by the Company for the said CSR Project(s)/Program(s), including but not limited to review of reports submitted by them, through visits, audio-video meetings with partners and beneficiaries, to review the end use of CSR Funds. Such mechanism shall be developed taking into account the size, extent and intended impact of the said CSR Project(s)/Program(s).

9. Review and Authority:

On the recommendation of the CSR Committee, the Board reserves the right to amend by addition or deletion of any CSR Project(s)/Program(s) and of any provision of the AAP, in furtherance of achieving the stated objectives of the Company, from a CSR perspective. The AAP, if required, shall be modified, reviewed and approved not later than Q3 of the FY.

This AAP once reviewed by the Board (including amendments to AAP) shall be valid till March 31, 2023.

However, the provisions of this AAP shall continue to remain in force and binding with regards to all the Ongoing and Standalone CSR Project(s)/ Program(s) undertaken/supported by the Company, in terms of the approval granted by the Board, pursuant to the CSR Policy of the Company.

