



Corporate Social Responsibility Policy

**HP India Sales Private Limited
HP PPS India Operations Private Limited
HP PPS Services India Private Limited
HP Computing and Printing Systems India Private Limited**



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1 INTRODUCTION

1.1 HP Philosophy

Founded in 1939, Hewlett Packard Company's (HP) founders, Bill Hewlett and Dave Packard started HP with a vision that has transformed HP today into the one of largest providers of information technology infrastructure, software, services, and solutions to individuals and organizations of all sizes. HP aims to enrich society and drive sustainable economic growth by giving people and businesses innovative ways to be more creative, productive, and successful through the power of information. HP's founders, Bill and Dave, first put Global Citizenship on the list of HP's corporate objectives in 1957. Being a good corporate citizen is integral to HP's corporate purpose of advancing the way people live and work.

In the words of one of the founders Dave Packard **"The betterment of society is not a job to be left to a few. It's a responsibility to be shared by all."** Today, Corporate Social Responsibility (CSR) remains a core value and one of HP's seven corporate objectives. With operations in more than 170 countries, HP's scale means we can positively impact critical issues affecting communities worldwide. CSR, through our Living Progress initiatives is incorporated into HP's business strategy, guiding where HP can apply its technologies, influence and expertise to drive shared value and create a positive impact worldwide. HP's CSR commitments include, but are not limited to, education, healthcare, energy and climate change, and betterment of the society through respect for universal human rights and the environment, acting with integrity and accountability and operating responsibly and sustainably.

1.2 CSR in India

CSR in India has traditionally been seen as a philanthropic activity. While the corporate houses have been traditionally engaged in doing CSR activities voluntarily, the new CSR provisions put formal and greater responsibility on companies to set out clear framework and process to ensure strict compliance.

The new Companies Act 2013 (hereinafter referred to as 'the Act'), has introduced the idea of CSR to the forefront and through its "Comply-or-Explain" mandate. It mandates qualifying companies to constitute Corporate Social Responsibility Committee to effectively monitor CSR activities of the Company. Further the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as "CSR Rules") lays down the framework and modalities of carrying out CSR activities which are specified in Schedule VII of the Act.

2 OBJECTIVE & SCOPE

The main objective of the CSR Policy is to lay down guidelines for HP India Entities to make CSR as one of the key focus areas to adhere to HP's Global Living Progress strategy that focuses on making a positive contribution to society through high impact, sustainable programs.

This Policy covers current as well as proposed CSR activities to be undertaken by the Company and examining their alignment with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities.

The Company proposes to implement its CSR activities in various sectors stated hereunder:

2.1 Focus Areas & Priorities

HP's CSR focus areas would be in line to the Schedule VII activities:

- (i) eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach 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 48[including contribution to the Clean Ganga Fund setup 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 arts and handicrafts;
- (vi) measure for the benefit of armed force 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 recognized sports, Paralympic sports and Olympics sports;



- (viii) contribution to the Prime Minister's National Relief Fund or Prime Minister's Central 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 Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women;
- (ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and (b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- (x) rural development projects.
- (xi) slum area development.
- (xii) disaster management, including relief, rehabilitation and reconstruction activities.

The Company will review the sectors from time to time and make additions/deletions/clarifications to the above sectors.



3 CSR COMMITTEE

3.1 Constitution

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR shall be appointed by the Board of Directors of the Company which must consist of at least two or more Directors.

3.2 Responsibilities of the Committee

Following are the responsibilities of the CSR Committee:

- (i) Formulate CSR Policy and recommend the same to the Board of Directors of the Company for approval
- (ii) Recommend CSR activities as stated under Schedule VII of the Act
- (iii) Approve to undertake CSR activities in collaboration with HP Group companies/ other Companies/firms/NGOs etc. and to separately report the same in accordance with the CSR Rules
- (iv) Recommend the CSR Budget
- (v) Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules
- (vi) Create transparent monitoring mechanism for implementation of CSR Initiatives in India
- (vii) Submit the Reports to the Board in respect of the CSR activities undertaken by the Company
- (viii) Monitor CSR Policy from time to time
- (ix) Monitor activities/charter of Joint Working Group (JWG) who are authorized to ensure that the CSR activities of the Company are implemented effectively
- (x) Authorize executives of the Company to attend the CSR Committee Meetings

3.3 Frequency of the Meetings of the CSR Committee

The CSR Committee shall meet at least once in a quarter. Members of the CSR Committee can agree upon mutually regarding time and place for the said meetings. Quorum for the meeting should be two. The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio visual means in accordance with the provisions of the Companies Act, 2013 and rules made thereunder from time to time. Members of the Living Progress Team of HP shall be the Permanent Invitees to the said Meeting. Other Members of the Senior Management may attend the CSR Committee Meetings as may be appropriate, subject to the approval of the CSR Committee. Minutes of the CSR Committee shall be placed before the Board for noting.

4 CSR BUDGET/CSR SPEND

The Act mandates companies meeting the qualification criteria to allocate certain portion of its annual net profits (before tax) during the three immediately preceding financial years to be spent on CSR Activities that fall under purview of Schedule VII of the Act.

4.1 CSR Expenditure:

Net profit means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

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 –
 - (a) 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.
 - (b) 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) a company established under section 8 of the Act, or a Registered Public Trust or Registered Society,
 - (b) having charitable objects and CSR Registration Number under sub-rule (2) of rule 4; or
 - (c) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
 - (d) a public authority:



- (e) Provided that any capital asset created by a 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 the requirement of this rule, which may be extended by a further period of not more than ninety days with the approval of the Board based on reasonable justification.

4.2 Expenditure on CSR capabilities

The Company may build CSR capabilities of their own personnel as well as of their Implementing Agencies and such expenditure shall not exceed 5% of the total CSR spend of the Company as stated in the Rules from time to time. Determination of whether a particular expenses fall within this 5% cap can be decided in consultation of the Chief Financial Officer of the Company based on the clarification available from time to time in this regard.

4.3 Failure to spend the CSR Money

- If the company fails to spend the prescribed CSR amount during any FY and such unspent amount pertains to any ongoing project, the company shall transfer the unspent amount to a special bank account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account within a period of thirty days from the end of the financial year.
- The company would be required to spend that amount within three financial years from the date of such transfer. If a company fails to do so, it shall transfer the final balance of the unspent amount to a Fund specified in Schedule VII of the Companies Act, 2013 within thirty days from the date of completion of the third financial year.
- If the company fails to spend the prescribed CSR amount other than on an ongoing project, then the Board shall transfer such unspent amount to a Fund specified in Schedule VII of the Companies Act, 2013 within a period of 6 months of the expiry of the financial year.

5 CSR INITIATIVES

In line with Schedule VII of the Act and the CSR Rules, the Company shall undertake CSR activities included in its Annual CSR Plan, as recommended by the CSR Committee at the beginning of each year. The Committee is authorized to approve any modification to the existing Annual CSR Plan or to propose any new program during the financial year under review.

5.1 Annual Action Plan

The Annual CSR Plan is a yearly plan of CSR activities which would include guiding principles for selection, implementation and monitoring of CSR activities. It would be placed before the Board of Directors of the Company based on recommendation of its CSR Committee which outlines the following aspects of CSR initiatives of the Company:

- 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 such projects or programmes as specified in sub-rule (1) of rule 4;
- 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 other information as may be required by the CSR Committee

5.2 Collaboration

- I. The Board shall ensure that the CSR activities are undertaken by the company itself or through -
 - a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
 - a 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
 - a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.



- II. Company may engage international organizations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR policy as well as for capacity building of their own personnel for CSR.
- III. Company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with these rules.
- IV. The Board of a company shall satisfy itself that the funds so disbursed 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.
- V. In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period."

The Company may collaborate with other HP Affiliates or its subsidiaries or any other Company as may be approved by CSR Committee to implement CSR activities and the same shall form a part of the Annual CSR Plan. The Company may form trusts on its own to carry out CSR activities in accordance with the CSR Rules and to administer its CSR activities. The Company may also collaborate its CSR activities with other HP Affiliates or its subsidiaries or any other Company as may be eligible and approved by the CSR Committee vis-à-vis the Board of Directors and towards this effort, the Company may jointly along with other HP Affiliates or its subsidiaries or any other Company form Trusts to administer the CSR activities.

5.3 Disqualifying Activities for CSR

- I. activities undertaken in pursuance of normal course of business of the company:

Provided that any company engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that:

- a. such research and development activities shall be carried out in collaboration with any of the institutes or organizations mentioned in item (ix) of Schedule VII to the Act.
- b. details of such activity shall be disclosed separately in the Annual report on CSR included in the Board's Report.



- 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;

5.4 CSR Reporting

- I. The Board's Report of the company covered under these rules pertaining to any financial year shall include an annual report on CSR containing particulars specified in Annexure I or Annexure II, as applicable.
- II. In case of a foreign company, the balance sheet filed under clause (b) of sub-section (1) of section 381 of the Act, shall contain an annual report on CSR containing particulars specified in Annexure I or Annexure II, as applicable.
- III.
 - a. In case the average CSR obligation for any of the HP India Entities crosses ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, HP shall undertake impact assessment, through an independent agency, of our 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.
 - b. The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.
 - c. Company may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed five percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is less."



6 PUBLICATION OF CSR POLICY & PROGRAMS

6.1 Publication of the CSR Policy

As per the CSR Rules, the contents of the CSR Policy shall be included in the Directors' Report and the same shall be displayed on the Company's website along-with Composition of CSR committee and CSR projects approved by the board.



7 POLICY REVIEW & FUTURE AMENDMENT

The Committee shall annually review its CSR Policy from time to time and make suitable changes as may be required and submit the same for the approval of the Board.

8 CONTACT

For queries related to CSR policy and activities, please write to us at:

hpindiaccsr@hp.com

For more updates on our CSR activities please visit:

<https://www.hpindiaccsr.com/>



Composition of CSR Committee

Entity	Members
HP India Sales Private Limited	Deepa Swaminathan
	Ananda Raghuveer Naik

Entity	Members
HP PPS India Operations Private Limited	Deepa Swaminathan
	Tapas Panda

Entity	Members
HP Computing and Printing Systems India Private Limited	Vijay Mark Anand Rao
	Vinayaka Vittaldas

Entity	Members
HP PPS Services India Private Limited	Biju Subramanian Pillai
	Vinayaka Vittaldas



Approved CSR Projects for FY 2024-25

HP India Sales Private Limited

Sr. No.	Broad Category (In line to Schedule VII Activities)	Name of the project	Thematic Area	Modalities of Execution	Brief Details of the Project
1.	(ii) promoting education	HP CLAP – Delhi and Uttarakhand	Education	Through implementing agency - Society For All Round Development	Vans equipped with Chromebooks, Wi-Fi devices, e-Learning Content, intended at driving digital equity, at schools and local communities
2.	(ii) promoting education	HP Muskan Lab - Gurgaon	Education	Through implementing agency - Society For All Round Development	Developing smart labs equipped with devices, e-learning content and Wi-Fi to support digital learning at government schools
3.	(ii) promoting education	Support for learning opportunities to medical students	Education	Through implementing agency - ShikshaDaan	The program is designed to offer learning opportunities to medical students and nurses by providing them with computational devices to enhance their skills and knowledge.
4.	(ii) promoting education	Serendipity Arts Festival 2024	Education	Through implementing agency - Serendipity Arts Foundation	Support to the Young Learners Programming initiative as part of Serendipity Arts Festival, promoting education, digital inclusion and environmental sustainability
5.	(ii) promoting employment enhancement vocational skills	Training for students from Tribal communities	Vocational training	Through implementing agency - Samta Purushottam Agrawal Memorial Foundation	Training students from Tribal communities on courses focused on fashion designing and digital literacy to prepare them for employment opportunities
6.	(iii) measures for reducing inequalities faced	Village development project	Community development	Through implementing agency - Swades	Village development through digital enablement and capacity building of



	by socially and economically backward groups.			Foundation	community members using technology
7.	(ii) promoting education	HP Future Impact Leaders	Education	Through implementing agency - Vedic Sanskaram Trust	HP Future Impact Leaders - IICA Certified Environmental – Social - Governance (ESG) Professional Program. Training for professionals in the Sustainability sector to emerge as leaders in navigating the ESG frameworks
8.	(ii) promoting education among women	Establishment of Centre of excellence	Skilling and entrepreneurship development	Through implementing agency - WeHub Foundation	Setting up Centre of Excellence for skilling and Entrepreneurship Development to empower women and young girls
9.	(ii) promoting education	Improving outcomes through Adaptive learning initiative	Education	Through implementing agency - Pratham Infotech	Implementation of a personalized adaptive learning tool in the government schools to improve learning outcomes
10	(ii) promoting employment enhancement skills	Establishment of Center of Excellence (CoE) in Tier 2 city	Training	Through implementing agency - ICT Academy Of Tamil Nadu	Training students to develop employability skills by establishing 3 CoE in Madurai
11	(ii) promoting education	Setting up of labs in schools	Education	Through implementing agency - Learning Links Foundation	Supporting with setting up of labs in schools of Uttar Pradesh and Jharkhand to impart Computational thinking skills to school students
12	(ii) promoting education	AI & Gaming Hub	Education and technology development	Through implementing agency - Learning Links Foundation	Setting up AI and Gaming Innovation Hub at Sri Krishnarajendra Silver Jubilee Technological Institute (SKSJTI), Bengaluru (Ongoing Project)
13	(ii) promoting employment enhancement skills among women	Training program for rural women	Vocational training	Through implementing agency - Gram Vikas Society	Developing financial skills among rural women and youth as business correspondents (Ongoing Project)



HP Computing and Printing Systems India Private Limited

Sr.No.	Broad Category (In line to Schedule VII Activities)	Name of the project	Thematic Area	Modalities of Execution	Brief Details of the Project
1.	(ii) promoting education	Rotary HP-Muskaan Schools Project	Education	Through implementing agency -Rotary Bangalore IT Corridor Charitable Trust	Project for making the identified schools as model schools by setting up of smart labs to bring transformation of learning space leveraging technology
2.	(i) Promoting healthcare	Project for setting up of Cryostat	Medical & Healthcare	Through implementing agency -Anjeze Charitable Trust	Setting up of a Cryostat to enable pathologists to quickly and efficiently prepare tissue samples for examination particularly aimed at supporting patients from low-income communities.
3.	(ii) promoting employment enhancement skills among women	Training program for rural women	Vocational training	Through implementing agency -Gram Vikas Society	Developing financial skills among rural women and youth as business correspondents.
4.	(ii) promoting education	Smart classroom set up project	Education	Through implementing agency - Learning Links Foundation TN & KA	Setting up of six smart classrooms across two government schools in Chennai & Bengaluru
5.	(i) promoting healthcare	Healthcare improvement program	Healthcare	Through implementing agency -Gram Vikas Society	Improving the healthcare access in the Country through technology enablement across medical sites. (Ongoing Project)



HP PPS India Operations Private Limited

Sr.No.	Broad Category (In line to Schedule VII Activities)	Name of the project	Thematic Area	Modalities of Execution	Brief Details of the Project
1.	(ii) promoting education	Setting up makerspace	Education	Through implementing agency - Inqui-Lab Foundation	Setting up makerspace across government schools in Telangana for improvement in students' critical skills in addition to creating market-ready prototypes
2.	(ii) promoting education	ICT infrastructure project	Education	Through implementing agency - Learning Links Foundation Odisha	Development of ICT infrastructure for schools and supporting with digital lab, mentor support, teacher capacity development
3.	(ii) promoting employment enhancement skills among women	Training program for rural women	Employment enhancement	Through implementing agency- Gram Vikas Society	Developing finance skills among rural women and youth as business correspondents



HP PPS Services India Private Limited

Sr.No.	Broad Category (In line to Schedule VII Activities)	Name of the project	Thematic Area	Modalities of Execution	Brief Details of the Project
1.	(ii) promoting education and livelihood enhancement	Digital Learning Access Initiative – Bridging Educational Gaps & Empowering Communities	Education	Through implementation agency- Society for all round development	Continued Learning Access Project – A digital Vehicle designed to harness technology for minimizing learning gaps and fostering community empowerment
2.	(ii) promoting healthcare	AI Development & Integration for Enhanced Clubfoot Treatment in Children	Healthcare	Through implementation agency – Anushkaa Foundation for Eliminating Clubfoot	Developing and integrating AI tools to improve treatment of clubfoot in children
3.	(ii) promoting education	AI & Gaming Hub set up	Education	Through implementing agency - Learning Links Foundation	Setting up AI and Gaming Innovation Hub at Sri Krishnarajendra Silver Jubilee Technological Institute (SKSJTI), Bangalore

CSR ANNUAL ACTION PLAN – FY 2024-25

1. SHORT TITLE AND APPLICABILITY:

- 1.1. This plan encompasses the annual action plan of **Polycom Technology (R & D) Center Private Limited (“Company”)** toward its corporate social responsibility (“CSR”) obligations for FY 2024-25.
- 1.2. This plan shall apply to all CSR initiatives and activities to be undertaken by the Company during FY 2024-25.
- 1.3. This CSR annual action plan shall operate as the corporate social responsibility annual action plan of the Company for the purposes of Section 135 of the Companies Act, 2013, as amended (“Act”) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 made thereunder, as amended (“Rules”) for FY 2024-25.

2. A LIST OF CSR PROJECTS OR PROGRAMMES APPROVED TO BE UNDERTAKEN IN AREAS OR SUBJECTS SPECIFIED IN SCHEDULE VII OF THE ACT:

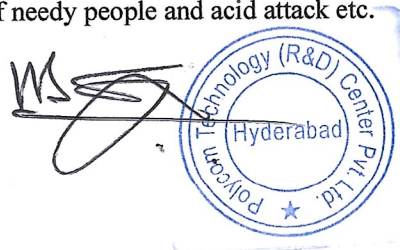
- 2.1. Contribution to the Prime Minister’s National Relief Fund.

3. THE MANNER OF EXECUTION OF CSR PROJECTS AND/OR PROGRAMMES:

- 3.1. Directly by the Company making the required contribution into the Prime Minister’s National Relief Fund, which is managed by Government of India through the Prime Minister’s Office.

4. THE MODALITIES OF UTILISATION OF FUNDS AND IMPLEMENTATION SCHEDULES FOR THE PROJECTS AND/OR PROGRAMMES:

- 4.1. The Company’s CSR budget will be fixed in accordance with the provisions of the Act and the Rules.
- 4.2. The budget will not be less than 2% of the average net profits of the Company during the three immediately preceding financial years.
- 4.3. The CSR budget will be spent on CSR activities approved by the Board, based on the recommendation of the CSR Committee.
- 4.4. The CSR contribution and spending will be utilized by the Company directly making the required contribution into the Prime Minister’s National Relief Fund and obtaining a receipt in this regard.
- 4.5. The Prime Minister’s National Relief Fund is a dedicated fund and the donations and contributions made to this fund are utilized and implemented with the primary objectives to:
 - 4.5.1. render immediate relief to families of those killed in natural calamities like floods, cyclones and earthquakes, etc.;
 - 4.5.2. assist partially in defraying the expenses for medical treatment like heart surgery, kidney transplantation, cancer treatment of needy people and acid attack etc.



4.6. Therefore, the Company is not required to devise modalities of utilisation of funds or implementation schedules for the amount contributed into the Prime Minister's National Relief Fund, and it will be as decided by, and as per the procedures laid down by, the Fund managed by Government of India through the Prime Minister's Office.

5. MONITORING AND REPORTING MECHANISM FOR THE PROJECTS AND/OR PROGRAMMES; AND

5.1. The Prime Minister's National Relief Fund is managed and monitored by the Government of India through the Prime Minister's Office. Therefore, the Company is not required to devise monitoring and reporting mechanism for the amount contributed into the Prime Minister's National Relief Fund.

5.2. However, the CSR committee and the Board will monitor the CSR contribution and spending and ensure that the required amount is spent prior to March 31st of the financial year.

6. DETAILS OF NEED AND IMPACT ASSESSMENT, IF ANY, FOR THE PROJECTS UNDERTAKEN BY THE COMPANY

6.1. Since the average CSR obligation in the three immediately preceding financial years is less than Rs. 100,000,000 (Rupees one hundred million only), the provisions relating to the impact assessment under the Act and Rules are not applicable to the Company.

7. GENERAL:

7.1. This plan is recommended by the CSR committee of the Board at their meeting held on September 27, 2024 for approval by the Board of the Company.

7.2. The Board may alter this plan at any time during the financial year, as may be recommended by the CSR Committee, based on the reasonable justification for such alternation.

7.3. In case of any doubt with regards to any provision of this plan and also in respect of matters not covered herein, a reference should be made to the CSR Committee. In all such matters, the interpretation and decision of the CSR Committee shall be final.

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