

CORPORATE SOCIAL RESPONSIBILITY POLICY MARUBENI INDIA PRIVATE LIMITED

1.0 Philosophy

Marubeni India Private Limited (“Company or MIPL”) strongly believes that Corporate Social Responsibility is linked with the principles of Sustainability. The Company also deeply acknowledges that its business operations have wide impact on the regions where it operates, and therefore an effective practice is required giving due consideration to the interests of its stakeholders including shareholders, customers, employees, suppliers, business partners, local communities and other organizations.

Therefore, it is the core corporate responsibility of MIPL to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

The Company endeavors to make Corporate Social Responsibility (“CSR”) a key business process for sustainable business development.

2.0 Objective

The key objective of this CSR policy is to lay down guidelines for the Company to conduct its business operations in an accountable manner that creates a sustained positive impact on society.

MIPL will act as a good corporate citizen, subscribing to the highest principles of CSR for implementation.

3.0 Guiding Principles

MIPL is committed towards achieving its corporate principles through sustainable development *vis-a-vis* comprehensive growth. The Company constantly endeavours to enforce strong corporate culture which emphasizes on integrating CSR values with corporate business objectives.

To attain its CSR objectives in a professional and integrated manner, the company shall:

1. pursue a corporate strategy that enables realisation and balance of the twin goals of shareholder value enhancement and societal value creation.
2. contribute to sustainable development in areas of social interest through initiatives that addresses the challenges faced by the Indian society.

3. sustain and continuously improve standards of Environment, Health and Safety through the collective endeavour of Company and its employees at all levels, as may be considered appropriate from time to time.
4. implement social investments / CSR programs primarily in the economic vicinity of Company's operations with a view to ensuring the long term sustainability of such initiatives.

4.0 Scope of CSR Activities

- 4.1 The CSR activities to be undertaken by the Company must be in project / program mode and within the purview of Schedule VII of the Companies Act, 2013, and its rules made thereunder ("Act"), as amended from time to time. The CSR Projects / Programs shall be identified and budgets shall be allocated on the basis of need assessment.
- 4.2 The Company shall undertake such activities for the purpose of its CSR initiatives as mentioned in *Annexure – I* to this policy.

5.0 Annual Action Plan and Budgetary allocation of CSR Expenditure

- 5.1 The CSR Committee shall formulate and recommend to the Board of Directors of the Company ("**Board**"), an annual action plan, pursuant to this CSR policy, which shall include the following, namely:-
 - (a) the list of CSR projects or programmes that are approved to be undertaken;
 - (b) the manner of execution of such projects or programmes;
 - (c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - (d) monitoring and reporting mechanism for the projects or programmes; and
 - (e) details of need and impact assessment, if any, for the projects undertaken by the company:

Provided that Board may 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.

- 5.2 The CSR Committee shall recommend to the Board) of Company, the amount of expenditure to be incurred by the Company on the CSR activities/projects/programs as undertaken by the Company and any surplus arising out of such CSR activities/projects/programs shall not form part of the business profits of the 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 as specified under the Act within specified time.

- 5.3 The Board shall endeavour that in each financial Year (FY), at least such amount as prescribed under Companies Act, 2013 and as recommended by CSR Committee, is spent on CSR activities undertaken by the Company as per *Annexure – I* to this policy.
- 5.4 In the event, that amount indicated in para 5.3 above is not spent in its entirety in that Financial Year, the unspent CSR amount, if any, shall be transferred to any fund included in Schedule VII of the Act. However, if unspent CSR amount could not be even transferred to any fund included in Schedule VII of the Act, the reasons thereof will be outlined in the Annual Report of the Company.
- 5.5 The budget allocation for individual CSR Projects / Programmes / activities shall be made by the CSR Committee of the Board in the beginning of every financial year after considering the CSR budget for that year. However, to assist in planning of the activities, the indicative budget allocation for broad sector of activities is mentioned in *Annexure – I*.
- 5.6 Subject to applicable laws, the expenses which are core and essential to the formulation of the CSR project / program, as may be decided by the CSR Committee, shall be considered as a part of direct cost of CSR expenditure.

6.0 Planning & Execution

- 6.1 The CSR Committee shall identify and recommend to the Board, the suitable activities/projects/programs to be undertaken by the Company, from time to time in line with the CSR objectives and shall also specify the modalities of execution of such CSR activities/projects/programs and implementation schedules of same.
- 6.2 To ensure effective implementation of the CSR programs undertaken, the CSR Committee shall execute such programs either through, in-house CSR volunteers team or approved implementing agencies.
- 6.3 The Company may also hire the professional services of independent agencies or organisations to assist in designing, launching, implementing and reviewing its CSR projects / programs.
- 6.4 The Company may undertake the approved CSR activities either by itself or through such other entities as may be permitted under Companies Act, 2013 and its rules, as amended from time to time, including through,
- 6.4.1 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, established by the company, either singly or along with any other company, or
- 6.4.2 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.

- 6.5 The Company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of the Company along with other companies are in a position to report separately on such projects or programmes in accordance with prescribed rules under the Companies Act, 2013.
- 6.6 The Company shall also register itself with the Central Government, for undertaking CSR activities, as and when required, and obtain a unique CSR Registration Number.

7.0 Monitoring & Evaluation

- 7.1 The CSR Committee shall monitor from time to time, the progress of CSR activities/projects/programs undertaken by the Company and report to the Board ensuring that all projects / programs are duly implemented as budgeted. The Board shall satisfy itself 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. In case of ongoing project, the Board 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.
- 7.2 The monitoring mechanism shall include one or all of following actions:
- (i) Regular field visits to Project / Program sites;
 - (ii) Comprehensive documentation / compilation of Field Reports;
 - (iii) Regular interaction with beneficiary communities to obtain feedback;
 - (iv) Monitoring of timely fund utilization to ensure that Projects / Programs as budgeted are actually being carried out and/or
 - (v) Any other activity that the CSR Committee/Board may deem necessary in the larger interest of its CSR initiatives.
- 7.3 Professional agencies may also be hired for carrying out Monitoring & Evaluation.

8.0 Disclosure & Reporting

- 8.1 The Company shall comply with relevant provisions of the Companies Act, 2013 and rules made thereunder ensuring that it makes a full disclosure of its CSR Policy, strategy, projects / programs, activities, monitoring mechanism, implementing agencies, if any, expenditure details as well as the composition of the CSR Committee of the Board.

8.2 The Company shall make a full report of its CSR projects / programs undertaken during the previous year in the format prescribed for the “Annual Report on CSR Activities to be included in the Board’s Report” in accordance with prescribed rules.

9.0 *Review of Policy*

This policy shall be governed by the provisions of legislation as may be applicable from time to time and such other rules, regulations and guidelines as may be issued by appropriate authorities.

First Edition – September, 2014
Second Edition – October, 2017
Third Edition – February, 2021

Annexure – I***NATURE OF CSR ACTIVITIES/ PROGRAMS**

S. No.	Financial Year	Thematic Areas	Proposed Activities	Target Group	Geographic Area	Indicative Budget Allocation
1.	2021-22	Livelihood enhancement / Rural Development projects	FARM TO PLATE- An initiative to connect farmers with consumers	Under-privileged/ economic backward/poor rural people	Jharkhand or any other area as may be decided by CSR Committee	75~100% of CSR Budget
2.	2022-23	Livelihood enhancement / Rural Development projects	FARM TO PLATE- An initiative to connect farmers with consumers	Under-privileged/ economic backward/poor rural people	Jharkhand or any other area as may be decided by CSR Committee	75~100% of CSR Budget
3.	2023-24	Livelihood enhancement projects	Livelihood enhancement for improving the socio-economic conditions of women farmers through support and promotion of dairy based enterprise and production enhancement	Women Dairy farmers at rural areas	Rajasthan or any other area as may be decided by CSR Committee	95~100% of CSR Budget

As and when need arises, the Company also proposes to contribute to Prime Ministers' National Relief Fund or funds set up the Central/State Governments or to non-profit organizations and other institutions in line with Schedule VII of Companies Act, 2013.

*** Annexure-I amended, revised and approved in the meeting of the Board of Directors held on August 21, 2023 pursuant to recommendations made by CSR Committee**