

CSR Annual Action Plan – Financial Year 2025-26

The CSR Annual Action Plan (“**CSR Plan**”) for the financial year 2025-26 is drawn up in line with the requirements stipulated under sub-rule 2 of rule 5 of the Companies (Corporate Social Responsibility) Rules, 2014 (“**the Rules**”) as amended from time to time.

a) The list of CSR Projects or Programme that are approved to be undertaken in areas or subjects specified in Schedule VII of the Companies Act, 2013 (“the Act”).

Sr. No.	Focus Area from Schedule VII to the Act.	Project	Location of the Project	Brief about the Programme / initiatives	CSR Partners
1	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.	To be identified	Nationwide focusing on areas adjacent to Project Sites (Bihar/Odisha) and Offices (Mumbai/Delhi)	Initiative aimed at helping reduction of pollutants and contaminating substances affecting salubrity of soil, water and air to ensure more healthy farming and water access	To be identified
2	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.	To be identified	Nationwide focusing on areas adjacent to Project Sites (Bihar/Odisha) and Offices (Mumbai/Delhi)	Initiative focused on stimulating girls’ interest on STEM education, with particular attention to support those students from fragile social and economic backgrounds	To be identified
3	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	To be identified	Nationwide focusing on areas adjacent to Project Sites (Bihar/Odisha) and Offices (Mumbai/Delhi)	Initiative aimed at involving women in economy in a more active way both providing training opportunity and setting the conditions for their future entrance in work market	To be identified
4	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	To be identified	Nationwide focusing on areas adjacent to Project Sites (Bihar/Odisha) and Offices (Mumbai/Delhi)	Initiative aimed at helping the safeguard and protection of biosystems and biodiversity, also in terms of reduction of pollutants and contaminating wastes, promoting at the same time awareness on sustainability topics among local communities	To be identified
Total Funds Allocation for FY 2025- 26: - Nil* <i>Basis the provisional calculation, total funds allocated for FY 2025-26 is Nil. However, the figures are subject to change based on the audited financials of the Company.</i>					

b) The manner of execution of such CSR Projects or Programmes.

The CSR Projects or Programmes listed in the CSR Plan shall be undertaken through implementing agencies which will either be.

- (i) 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
- (ii) any entity established under an Act of Parliament or a State legislature; or
- (iii) 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.

The Company may also consider the possibility of engaging International Organisations for designing, monitoring and evaluation of the CSR Projects or Programme as per its CSR policy as well as for the capacity building of its own CSR Team.

c) The modalities of utilization of funds for the CSR Projects or Programmes and implementation schedules for the CSR Projects or Programmes.

- (a) Modalities of the utilization of funds
 - i. The CSR budget will be fixed in accordance with the provisions of the Act and the Rules.
 - ii. The CSR budget shall not be less than 2% of the average net profits of the Company during the three immediately preceding financial years.
 - iii. The CSR budget will be spent on CSR activities which will be approved by the Board of Directors of the Company on the recommendation of the CSR Committee
 - iv. Depending upon the nature of CSR Projects or Programme, a reimbursement model may also be followed. The funds will be disbursed after evaluation and assessment of the expenses incurred. Based on the expenses incurred & the submission of the relevant supporting of the expenses, i.e., bills, receipts, invoices, bank statements, etc. respective amounts can be disbursed at different intervals, quarterly & half-yearly.
 - v. For other CSR Projects, the funds will be directly disbursed to beneficiaries/implementing agencies with the approval of the CSR Committee & Board of Directors of the Company. Alternatively, Fund will also be disbursed in phases/tranches wise depending on the nature/activities of the CSR Project.

(b) Implementation Schedule for the CSR Projects or Programme

- i. All the CSR projects will be implemented as per the scheduled timeline agreed upon in the respective agreement.
- ii. CSR Team will collect all the set deliverables from implementing agencies.
- ii. Duration for CSR projects/programmes will be of one (1) year to three (3) years which will be reviewed periodically based on the project performance.

d) Monitoring and reporting mechanism for the CSR Projects or Programmes.

- (i) The Monitoring Mechanism of each project will differ based on the nature / activities of the project.

All the projects will be monitored & evaluated as per the objectives & deliverables set for respective projects as per the Board of Directors & CSR Committee recommendation.

- i. CSR team shall carry out the monitoring of CSR projects or programmes with implementing agencies at different intervals through field visits, periodical calls, reporting, communication with stakeholders/beneficiaries etc.
 - ii. For the purpose of proper monitoring of the CSR projects or programmes, each project shall include a well-defined timeline & parameters.
 - iii. Utilization Certificate with a statement of expenditure duly certified by a Practicing Chartered Accountant/Authorized Auditor will also be requested from the implementing agencies to whom the CSR fund is allocated.
- (ii) Reporting & Documentation:
- a. Project documentation: Reports like quarterly reports, half-yearly reports, annual reports, etc. will be collected by the CSR team as per the agreed timelines.
 - b. Financial Tracking: In order to track the proper utilization of funds, where applicable, at different intervals of the project, the CSR team will either request a certificate from independent Chartered Accountants from the implementing agencies or arrange to carry out verification of the statement of accounts through Internal Audit Department of the Company for cross-verification of financial documents like invoices, bills & receipts, bank statements etc.

(e) Details of need and impact assessment, if any, for the projects undertaken by the company:

Since the Company does not have an average CSR obligation of Rs. 10 Crore or more in the three immediately preceding financial years, the need for conducting an impact assessment for the projects undertaken by the Company is not considered necessary.

(f) Amendments

The CSR Annual Plan may be amended/modified at any time during the financial year basis the reasonable justification provided by the CSR Committee of the Company and approved by the Board of Directors of the Company.

CSR Team may propose addition / deletion / modification - with proper justification - of project / activity for consideration of the CSR Committee. On receipt of such proposals, CSR Committee may consider recommending suitable modification in the CSR Plan for approval of the Board.

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