

## CLP India Private Limited - Corporate Social Responsibility Policy

---

The Corporate Social Responsibility (“CSR”) Policy of CLP India Private Limited (the “Company” / “CLP India”) establishes a common and coherent approach to CSR and facilitates an organized and efficient deployment of the Company’s resources in order to contribute to the development of the communities in which it serves.

### 1) Purpose

The Company is committed to a socially responsible corporate growth. It seeks to be an active participant in the social and economic development of the communities in which it operates, while meeting the interests of all its stakeholders.

### 2) Vision

The Company would like to engage in development initiatives in communities in which it serves so that every child, young person and adult has a reason to believe in the prospect of a better future.

### 3) Policy guidelines

Mutual trust, respect and integrity are key pillars for building relationships with its community and business stakeholders. The contributions made through community investment initiatives are aimed at delivering a positive impact directly to those communities. The Company commits to:

- Undertaking proactive engagement with stakeholders to actively contribute to the socio-economic development of the communities in which it operates;
- Supporting programmes that reflect the needs and expectations of local communities and are sensitive to prevailing cultures, traditions and values;
- Engaging in long-term partnerships with credible, national, regional and local community organisations, non-governmental organisations, and charities;
- Creating a positive footprint in society by creating an infrastructure for inclusion and empowerment for communities;
- Focusing on educating women and children and the underprivileged by providing appropriate skills, training and infrastructure;
- Supporting the development of basic nutrition and health care facilities in rural communities;
- Encouraging employee participation in volunteering; and
- Evaluating contributions and the impact that they make.

### 4) Implementation strategy

While implementing the CSR Policy, regard may be had to the implementation strategy which, *inter alia*, encompasses the following principles:

- Youth and women empowerment as cross-cutting theme while doing locally relevant programmes
- Priority to immediate catchment, states where we have businesses and aspirational districts as notified by the government; however, open to work elsewhere where there is a need
- Priority to vulnerable and socio-economically weaker section
- Strategic implementation, need-based approach and early community ownership
- In addition to three focus areas, work on themes of renewable energy based rural development and livelihood; biodiversity; environment and climate change resilience
- Establish long-term and strategic partnerships

- Participate in design process and not just funding
- Leverage employee skills and build volunteering

The Company's focus areas include:

- **Education and training:** The Company supports initiatives that advance literacy so that rural communities, and those disadvantaged, can make informed choices based on a holistic understanding of the environment they live in.

Specific activities focus on investing in the education and skills development of children and women in the rural communities surrounding our operations. The Company believes that quality education is the first step in building a skilled and developed community, and by providing training and skills development initiatives, it can help empower women and the next generation to drive and sustain their own personal and community development.

- **Sustainable communities:** The Company seeks to improve quality of life for our local communities by supporting initiatives that provide for the socio-economically disadvantaged. Some of these initiatives include: increasing access to healthy food; providing vital materials; opportunities for physical activity; and local tree planting and sustainable environment initiatives.
- **Healthcare and sanitation:** The Company operates in rural locations, where communities rely on limited healthcare resources. The rural development programmes strive to provide mobile medical facilities, improve sanitation conditions, social education courses on mother and child nutrition, as well as providing funding for para-medical training for local community members.

## 5) Governance

The Board of Directors of the Company (the "Board"), the Corporate Social Responsibility Committee (the "CSR Committee") constituted by it as per the requirement of the Companies Act, 2013 and the Rules made thereunder, as amended from time to time (the "Act"), and the Management team are committed to the guiding principles of community investment and encouraging a corporate ethos of community care, within and outside the organisation.

On an overall level, the Board, assisted by the CSR Committee, is responsible for governance, capacity building and implementation of CSR programmes of the Company. The Board shall, *inter alia*:

- approve and implement the CSR Policy of the Company;
- approve and amend, if required, the Annual Action Plan, formulated and recommended by CSR Committee;
- satisfy itself in relation to disbursed CSR funds being utilized for the said purpose, as approved by it;
- review and take note of the Impact Assessment Reports;
- review and undertake all other activities as required in pursuance of its terms of reference and the law for the time being in force, from time to time.

The responsibilities of the CSR Committee shall, *inter alia*, be to:

- review, agree and establish the Company's CSR strategy to ensure that it remains an integral part of the Company's strategy and its implementation in practice and that the Company's social, environmental and economic activities are aligned with each other;
- formulate and recommend to the Board, a CSR Policy as per Section 135(3)(a) of the Act;

- develop and recommend for acceptance by the Board, policies on all aspects of CSR including health and safety, human rights, workforce diversity & inclusion, the environment, community and social investment, and other CSR related matters as may be determined by the CSR Committee;
- recommend the CSR budget to the Board;
- formulate and recommend to the Board, an Annual Action Plan (including amendments, if and whenever required) in relation to the CSR activities to be undertaken by the Company, from time to time;
- monitor compliance with the CSR policy and review performance against agreed targets, with specific reference to programme timelines and year-wise budgetary allocations;
- monitor the CSR Policy from time to time;
- receive reports and review activities from executive and specialist groups managing CSR matters;
- review the integration of CSR processes with the CLP Group's broader business risk management programme and reputation management priorities; and
- review and undertake all other activities as required in pursuance of its terms of reference and the law for the time being in force, from time to time.

At a business unit-level, the CLP India CSR Forum (the "CSR Forum") is responsible for devising local strategy, managing community investment, and co-ordinating community engagement activities. With support from the business units and the CSR Forum, the CSR Team of the Company, led by Head – CSR, is responsible for reporting to the Company's CSR Committee, the Board, any regulator, any reporting required under the laws for time being in force and the CLP Group, as well as in the Annual Sustainability Report.

The Chief Financial Officer of the Company, in terms of Rule 4(5) of the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended), shall be responsible for certifying that the funds disbursed have been utilised for the purposes and in the manner as approved by the Board, on the basis of the supportive documents provided by the CSR Team.

## **6) Reviewing**

The Board and / or the CSR Committee shall review this policy periodically to ensure that it is aligned with the changes in the legal as well as the business environment.

## **7) Reporting**

The Company is committed to communicating openly and transparently with its stakeholders on the economic, social and environmental impact of its business. Details of its community investment initiatives and programmes are reported on an annual basis in the Company's Sustainability Report, as well as on its website.

The CSR Policy conforms to Section 135 of the Companies Act, 2013 and the Rules made thereunder, and wherever applicable, to the various policies at the CLP Group level that are relevant to the areas of CSR.

-END-

**CSR Budget of CLP India Private Limited for FY 2020-21**

<b>CSR Budget I (Paguthan)</b>			
<b>Sr. No.</b>	<b>CSR Projects</b>	<b>Clause as per Schedule VII</b>	<b>Total Budget (INR)</b>
<b>A</b>	<b>Education &amp; Skill Development</b>		
1	Informal Education (up to March 2021)	Clause II	1,000,000
	<b>Total Education and Skill Development (A)</b>		<b>1,000,000</b>
	<b>Total (A) in million</b>		<b>1.00</b>
<b>B</b>	<b>Healthcare &amp; Sanitation</b>		
1	Mobile healthcare van project	Clause I	2,500,000
2	Solid waste management program at Paguthan & Kothi village (procurement of Tractor and trollies)	Clause X	250,000
3	Health care support	Clause I	500,000
	<b>Total Healthcare and Sanitation (B)</b>		<b>3,250,000</b>
	<b>Total (B) in million</b>		<b>3.25</b>
	<b>Total (A + B)</b>		<b>4,250,000</b>
	<b>Total in million</b>		<b>4.25</b>
<b>CSR Budget II (Corporate)</b>			
<b>Sr. No.</b>	<b>CSR Projects</b>	<b>Clause as per Schedule VII</b>	<b>Total Budget (INR)</b>
<b>A</b>	<b>Education &amp; Skill Development</b>		
1	COVID-19 support to communities	Clause I, X, XII	26,000,000
2	Girls Empowerment through Sports training	Clause II	1,100,000
3	TISS partnered program		2,000,000
4	Institution Building initiative	Clause II	3,200,000
	<b>Total Education and Skill Development (A)</b>		<b>32,300,000</b>
	<b>Total (A) in million</b>		<b>32.30</b>
<b>B</b>	<b>Healthcare &amp; Sanitation</b>		
1	Mobile Medical Van at Veltoor	Clause I	2,000,000
	<b>Total Healthcare and Sanitation (B)</b>		<b>2,000,000</b>
	<b>Total (B) in million</b>		<b>2.00</b>
<b>C</b>	<b>Sustainable Communities</b>		
1	CSR project at Veltoor	Clause X	2,500,000
2	Massive tree plantation	Clause IV	850,000
3	CSR Dashboard Automation		700,000
4	Provision for CSR project at a new project site	Clause X	1,100,000
	<b>Total Sustainable Communities (C)</b>		<b>5,150,000</b>
	<b>Total (C) in million</b>		<b>5.15</b>
<b>D</b>	<b>Miscellaneous support not enlisted above (D) (approval for the same to be sought separately from the Committee)</b>		<b>300,000</b>
	<b>Total (A + B + C + D)</b>		<b>39,750,000</b>
	<b>Total in million</b>		<b>39.75</b>
	<b>Total CSR Budget I + II</b>		<b>44,000,000</b>
	<b>Total in million</b>		<b>44.00</b>