



# CSR POLICY

## **Introduction**

This Corporate Social Responsibility Policy (“the **CSR Policy**”) has been framed by Edelweiss Gallagher Insurance Brokers Limited (“**EGIBL**” or the “**Company**”) (formerly known as Edelweiss Insurance Brokers Limited) in accordance with the applicable laws and CSR Rules issued from time to time.

## **Short title & Applicability**

This Policy is titled as the ‘*CSR Policy*’ and it shall apply to all CSR initiatives and activities taken up by the Company.

## **CSR Philosophy and Vision Statement**

To leverage the capacity and capital to equip and enable the social sector to achieve the greatest impact on the lives of the poor in India.

## **Scope of the Activities**

- i. Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare 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 vocational 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, establishing of old-age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities in 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 building and sites of historical importance and works of art, setting up public libraries, promotion and development of traditional arts 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 recognized 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. 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;
- x. 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);
- xi. Rural development projects;
- xii. Slum area development;
- xiii. Disaster management, including relief, rehabilitation and reconstruction activities.

It is clarified that all the aforesaid activities or programs shall be undertaken in India only and also that such programs and activities shall not be designed to benefit only the employees of the Company and their families.

### **Funding & Allocation**

For achieving its CSR objectives, the Company shall contribute at least 2% of the average net profits of the Company made during the 3 immediately preceding financial years specifically towards CSR initiatives. For this purpose, the net profit and average net profit shall be calculated in accordance with the provisions of Section 198 of the Companies Act, 2013 (the Act) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

Allocation of the annual budget for CSR activities in any given year shall be as per the provisions of the Companies Act, 2013 and Rules made thereunder, as amended from time to time. Any unspent/unutilized CSR allocation of particular year will be carried forward to the next year, i.e., the CSR budget will be non-lapsable in nature.

It is clarified that, the surplus arising out of CSR projects or activities shall not form part of the business profit of the Company and shall be ploughed back into the same project/activity, or shall be transferred to the Unspent CSR Account and it should be spent in pursuance of this CSR policy and the annual action plan of the Company, or the Company may transfer such surplus amount to a Fund specified in Schedule VII of the Act, within a period of six months of the expiry of the financial year.

Any unspent amount, other than unspent amount relating to an ongoing project, will be transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. Further, unspent CSR funds of ongoing projects will be transferred within a period of 30 days from the end of the financial year to a special account opened by the company in any scheduled bank called the "Unspent Corporate Social Responsibility Account". Such amount shall be spent by the company towards CSR within a period of 3 financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of 30 days from the date of completion of the third financial year.

Any excess expenditure i.e., beyond the prescribed CSR budget will be disclosed in the Board's CSR Report and shall be made available for set off against the CSR requirement to spend in any of the three succeeding financial years.

### **Implementation**

CSR programmes of the Company shall be undertaken as may be decided by the CSR Committee and the Board of Directors through implementing partners which include a company established under section 8 of the Act, or a registered public trust or a registered society for which the grant is being given. These organizations would need to be registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961). The above entities shall register with the Central Government by filing the form CSR-1 electronically with the Registrar, with effect from the 1<sup>st</sup> April 2021. The Company may engage International Organizations (as defined in Clause 2(g) of the Companies (Corporate Social Responsibility Policy) Rules 2014) for designing, monitoring, and evaluation of CSR Projects as well as capacity building of their personnel. The Company may also collaborate with other companies to undertake CSR projects, provided the Corporate Social Responsibility Committee(s) ("**CSR Committee**") of the respective companies are able to report separately on such projects.

### **Monitoring**

- i. To ensure effective implementation of the CSR programmes undertaken, a monitoring mechanism will be put in place.
- ii. The progress of CSR programmes undertaken will be reported by the respective implementing partners as the case may be to the CSR Committee on a quarterly basis and the CSR Committee shall review the progress of activities.
- iii. The Company and the r implementing partners may enter into such agreements as may be required from time to time for undertaking CSR activities.

- iv. CSR initiatives of the Company will also be reported in the annual report of EGIBL.
- v. The CSR Committee of the Company shall be responsible for formulating and recommending to the Board the CSR policy and a CSR annual action plan, provided that the Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on reasonable justification to that effect. The CSR Committee reports to the Company's Board of Directors.

**The CSR Annual Action Plan shall include the following:-**

- i. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- ii. the manner of execution of such projects or programmes;
- iii. the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- iv. monitoring and reporting mechanism for the projects or programmes and
- v. details of need and impact assessment, if any, for the projects undertaken by the company.

**Miscellaneous**

In case of any doubt with regard to any provision(s) of the policy, a reference shall be made to the CSR Committee of the Company. In all such matters, the interpretation & decision of the CSR Committee of the Company shall be final.

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines as may be issued by Government, from time to time.

The Policy shall be reviewed form time to time to keep abreast with changing requirements.