

POLICY ON CORPORATE SOCIAL RESPONSIBILITY("CSR")

CSR CONTEXT

At Empower Group, we recognize our responsibility towards the communities in which we operate. Guided by the principle of trusteeship, we are committed to creating sustainable and inclusive growth by addressing the social, economic, and environmental challenges faced by underserved and vulnerable sections of society.

Our vision is to contribute meaningfully to the development of communities through responsible and sustainable initiatives that enhance livelihoods, promote social equity, and improve the overall quality of life, thereby supporting the nation's broader development goals.

1. SCOPE AND APPLICABILITY

This Policy shall be applicable to all CSR initiatives undertaken by the Empower India Limited in pursuance of the requirements of Section 135 and Schedule VII of Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time;

2. OBJECTIVE OF CSR POLICY

The objective of this Policy is to continuously and consistently:

- ✓ identifying the areas of CSR activities;
- ✓ recommending the amount of expenditure to be incurred on the identified CSR activities;
- ✓ implementing and monitoring the CSR policy of the Company from time to time; and
- ✓ formulating a CSR annual action plan and recommending it to the board;
- ✓ reviewing Company's initiative and programs
- ✓ coordinating with other agencies in implementing programs and executing initiatives as per CSR Policy;

3. POLICY GUIDELINES

- All CSR Projects must be aligned as prescribed in Schedule VII of the Companies Act, 2013.
- CSR projects or programmes (except training of Indian Sports Personnel representing any State or Union territory at national level or India at international level) must be undertaken in India.
- CSR projects or programmes must not include the initiatives undertaken in pursuance of normal course of business of the Company.
- Projects or programmes that benefit only the employees of the Company shall not be

Empower India Limited

CIN: L51900MH1981PLC023931

Regd Office: 25 /25A, 2nd Floor, 327, Nawab Building, D. N. Road, Fort, Mumbai – 400 001

Mobile/Helpdesk No.: 97020 03139

Email: info@empowerindia.in; **Website:** www.empowerindia.in

considered as CSR.

- CSR activities should be in project/programme mode. One-off events such as marathons/awards/charitable contribution/advertisement/sponsorship of TV programmes etc. and any other sponsorship activity deriving marketing benefits for the company's products or services will not qualify as part of CSR expenditure.
- Contribution of any amount directly or indirectly to any political party shall not be considered as CSR.
- Activities carried out for fulfilment of any other statutory obligations under any law in force in India will not qualify towards CSR requirements.
- Any term not defined above, shall have the meaning assigned to it under the Act or the CSR Rules.

4. CSR COMMITTEE

- i. The CSR Committee shall be responsible for providing recommendations to the Board with respect to CSR Activities that may be undertaken by the Company in accordance with the CSR Policy as well as the Act and the CSR Rules.
- ii. The Committee shall consist of three or more Directors, out of which at least one director shall be an independent director.
- iii. The Company Secretary of the Company will act as Secretary to the CSR Committee.
- iv. The CSR Committee shall meet as and when necessary to discharge its functions under the Act.
- v. The CSR activities to be undertaken shall be evaluated depending upon the need and requirement. It shall be the responsibility of the whole committee as a whole.
- vi. **Role of the CSR Committee**

The CSR Committee shall be responsible for the following activities:

- a. Formulating and recommending CSR activities to the board of directors;
- b. Recommend amount of expenditure;
- c. Monitor CSR policy of the company; and
- d. Formulate annual action plan in pursuance of the CSR policy in accordance with the applicable law, and inclusive of the following items:
 - a. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - 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;

Empower India Limited

CIN: L51900MH1981PLC023931

Regd Office: 25 /25A, 2nd Floor, 327, Nawab Building, D. N. Road, Fort, Mumbai – 400 001

Mobile/Helpdesk No.: 97020 03139

Email: info@empowerindia.in; **Website:** www.empowerindia.in

- e. details of need and impact assessment, if any, for the projects undertaken by the Company;
- f. The CSR Committee may, in addition to its responsibilities under Section 135 of the Companies Act, 2013 and the applicable CSR Rules, provide guidance and recommendations to the Board on matters relating to Environmental, Social and Governance (ESG) initiatives, sustainability practices, responsible business conduct and other related matters. Such responsibilities shall be advisory in nature and shall not be construed as statutory functions of the CSR Committee under the Companies Act, 2013;
- g. the Committee shall provide vision and guidance to the Management to ensure that all long-term business proposals made to the Board are assessed through the lens of social, Environment, Safety, Health, and reputational implications – including governance and associated risks and opportunities.

5. CSR EXPENDITURE

- a. The Company shall spend at least 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years in accordance with the Act and the Rules and the CSR Policy.
- b. The CSR Committee shall recommend the manner in which the CSR Expenditure shall be incurred in a year, in accordance with the Act and the Rules and the CSR Policy.
- c. Any surplus arising out of CSR projects or programmes or activities shall not form part of the business profits of the Company. Such surplus shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of the CSR Policy and Annual Action Plan of the Company, or transferred to a Fund specified in Schedule VII of the Companies Act, 2013, within such period as prescribed under the applicable provisions of the Act and the CSR Rules, as amended from time to time.
- d. The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.

6. IDENTIFICATION OF PROJECTS

- a. The Board shall ensure that the CSR Activities that are undertaken by the Company should be within the scope of the following 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,

Empower India Limited

CIN: L51900MH1981PLC023931

Regd Office: 25 /25A, 2nd Floor, 327, Nawab Building, D. N. Road, Fort, Mumbai – 400 001

Mobile/Helpdesk No.: 97020 03139

Email: info@empowerindia.in; **Website:** www.empowerindia.in

animal welfare, agro forestry, 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 buildings 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 Government for social-economic development and relief and welfare of the Scheduled Castes, the Scheduled 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, and 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 Explanation - For the purpose of this item, the item 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under law for the time being in force;
- xii. Disaster management including relief, rehabilitation and reconstruction activities; and
- xiii. Any other project as may be specified under Schedule VII of the Companies Act, 2013, from time to time;
- xiv. Based on the scope of activities set out above, the CSR Committee shall provide recommendations to the Board with respect to specific CSR Activities that may be undertaken by the Company;

Empower India Limited

CIN: L51900MH1981PLC023931

Regd Office: 25 /25A, 2nd Floor, 327, Nawab Building, D. N. Road, Fort, Mumbai – 400 001

Mobile/Helpdesk No.: 97020 03139

Email: info@empowerindia.in; **Website:** www.empowerindia.in

- xv. In case any of the CSR Activities to be undertaken are anticipated to be long term i.e. an ongoing project being of a term of 3 (three) years excluding the financial year in which it was commenced, then a detailed estimate on implementation schedule or milestones should be submitted by the CSR Committee to the Board;
- xvi. The Board shall ensure that appropriate designated staff or personnel provide adequate assistance (viz. data collection, survey, quotations and costs involved etc.) to the CSR Committee to enable it to make necessary recommendations to the Board;
- xvii. Based on the recommendations of the CSR Committee, the Board shall approve the CSR activities of the Company for a given financial year.

7. CREATION OR ACQUISITION OF CAPITAL ASSET

The Company may spend its required CSR expenditure for creation or acquisition of a capital asset, which shall be held by –

- a. Company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number; or
- b. beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
- c. a public authority;

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.

8. THE MANNER OF EXECUTION OF CSR ACTIVITIES:

The CSR activities can be undertaken by the Company itself or through following Companies/Entity/Trust/ society having a valid CSR Registration Number -

- 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
- b. 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
- c. any entity established under an Act of Parliament or a State legislature; or
- d. 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.

Such Companies/Entity/Trust/ society shall submit CSR proposal form as prescribed by the Company along with the request letter for contribution of CSR activities.

9. IMPLEMENTATION

The CSR Committee shall provide guidance on the allocation of the CSR budget among the areas on an annual basis and seek approval from the Board.

The CSR Projects will be undertaken based on the annual action plan formulated and recommended by the CSR Committee and approved by the Board. The Board may alter the annual action plan at any time during the financial year, as per the recommendation of the CSR Committee based on reasonable justification to that effect.

10. MONITORING AND REPORTING MECHANISM

Quarterly reporting on the progress and amount spent on CSR activity shall be placed before the Committee.

The representatives of Company shall monitor the status and progress of each CSR activity, the photographs and CSR Fund Utilization Certificate shall also be placed before the Committee.

11. SURPLUS FROM CSR ACTIVITIES

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.

12. CARRY FORWARD AND SET OFF THE CSR EXPENDITURE

If in a Financial Year Company spends an amount in excess of required CSR expenditure 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 –

- i. the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any.
- ii. the Board of the Company shall pass a resolution to that effect.

13. MANDATORY TRANSFER OF UNSPENT CSR AMOUNT

If the Company fails to spend the required CSR expenditure, the Board shall, in its report shall specify the reasons for not spending the amount and, if the unspent amount does not relates to any ongoing project, the Company shall transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

If any amount remaining unspent, relates to any ongoing project, fulfilling such conditions as may be prescribed, undertaken by a Company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the Company within a period of thirty days from the end of the financial year to a special 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, and such amount

shall be spent by the Company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three 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 thirty days from the date of completion of the third financial year.

14. IMPACT ASSESSMENT

- a. The Company shall carry out Impact Assessment if there is average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, the Impact assessment of CSR Activities shall be carried through an independent agency of their CSR projects having outlays of one crore rupees or more, after one year of Completion of CSR activity and which have been completed not less than one year before undertaking the impact study.
- b. The impact will be assessed and compared against the planned benchmarks fixed at the time of planning to gauge the degree of success or failure of the CSR activities.
- c. The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.
- d. A Company undertaking impact assessment 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.

15. AMENDMENT

The Board of the Company may, subject to compliance with applicable law, at any time alter, amend or modify the CSR Policy as it deems fit to comply with the statutory obligation of the Company to undertake the CSR Activities.

For enquiries related to the CSR initiatives,

Please contact:

Priyanka Gupta

Company Secretary & Compliance Officer

Empower India Limited

CIN: L51900MH1981PLC023931

Regd Office: 25 /25A, 2nd Floor, 327, Nawab Building, D. N. Road, Fort, Mumbai – 400 001

Mobile/Helpdesk No.: +91 97020 03139

Email: info@empowerindia.in; Website: www.empowerindia.in

Empower India Limited

CIN: L51900MH1981PLC023931

Regd Office: 25 /25A, 2nd Floor, 327, Nawab Building, D. N. Road, Fort, Mumbai – 400 001

Mobile/Helpdesk No.: 97020 03139

Email: info@empowerindia.in; Website: www.empowerindia.in