



## Caspian Impact Investment Adviser Pvt Ltd

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### Corporate Social Responsibility

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Policy Owner	Head – CSR and Outreach (Mohini Devi)
Approved By:	Board of Directors
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Note:

- a) Levels of Confidentiality: Public (Level 1), Confidential (Level 2), Restricted (Level 3)
- b) Please refer to Annexure I for summary of changes to previous versions.
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**1. OBJECTIVE OF THE POLICY**

Caspian Impact Investment Adviser Private Limited ("Company"), provides capital to a wide range of institutions that serve the low income or financially excluded communities, directly or indirectly, in a responsible; transparent and sustainable manner that work in sectors with positive social and / or environmental impact.

With its in-depth knowledge of the financial and non-financial needs of the low income and economically disadvantaged sections of society, the Company is well positioned to continue to create positive impact on the lives of the disadvantaged through its CSR activities.

This Corporate Social Responsibility policy ("Policy") lays down guiding principles on, amongst other things, focus areas, undertaking; monitoring and reporting of CSR activities, roles and responsibilities of CSR Committee.

**2. DEFINITION**

- 2.1. **Act** means Companies Act, 2013 and all rules thereof;
- 2.2. **Annual Action Plan** means a yearly plan formulated by CSR Committee to identify and implement the CSR Programs for the financial year;
- 2.3. **Board** means the Board of Directors of the Company;
- 2.4. **Company** means Caspian Impact Investment Adviser Private Limited
- 2.5. **CSR** means Corporate Social Responsibility
- 2.6. **CSR Committee** means a committee formed under this Policy to oversee the implementation of CSR Programs and this Policy.
- 2.7. **CSR Expenditure** is the money spent on CSR Program
- 2.8. **CSR Focus Area** shall be as defined in Clause 3 below.
- 2.9. **CSR Program** means activities identified from the CSR Focus Area for implementation by the CSR Committee.
- 2.10. **Policy** means this policy on Corporate Social Responsibility.

**3. CSR FOCUS AREAS**

In accordance with Schedule VII of the Act, the Company will focus on the following areas in its CSR engagement:

- promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently-abled and livelihood enhancement projects;
- eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining quality of soil, air and water;

- contributions or funds provided to technology incubators as prescribed under the Companies Act, 2013.

**4. ANNUAL ACTION PLAN**

The CSR Committee shall formulate and recommend to the Board at the beginning of each year, an Annual Action Plan which shall include the following:

- A list of CSR Programs that shall be undertaken during the financial year;
- The execution plan of the identified CSR Programs;
- The amount to be spent on each of the identified CSR Program; and
- Monitoring and reporting mechanism for the identified CSR Program;
- Details of need and impact assessment of the CSR Programs, if any.

**5. CSR PROGRAM IMPLEMENTATION**

The Company may directly or through a company established under section 8 of the Act undertake its CSR Programs.

Based on the detailed proposal submitted and after due evaluation, the CSR Committee shall identify reputed implementing partners who are directly engaged in the CSR Focus Areas. CSR Expenditures will be made to programs where direct impact is visible and is measurable.

**6. CSR EXPENDITURE**

- 6.1. At least two per cent of the average net profits of the Company made during the three immediately preceding financial years, shall be spent on CSR Programs by the Company
- 6.2. When the Company is unable to spend such amount, the reasons thereof specified in the Directors' Report and:
  - If the unspent amount does not relate to any on-going project, the Company shall transfer such unspent amount to a Fund specified in Schedule VII of the Act, within a period of six months from the expiry of the financial year.
  - If the unspent amount is relating to an on-going project, the same shall be transferred within a period of thirty days from the end of the financial year to a special account to be opened in any Scheduled Bank to be called the Unspent Corporate Social Responsibility Account and spend such amount within a period of three financial years from the date of such transfer. If the Company is unable to spend as aforesaid, the same shall be transferred a Fund specified in Schedule VII of the Act, within a period of thirty days from the date of completion of the third financial year.
- 6.3. If the Company spends an amount in excess of what is specified under the act, it may set off such excess amount against the amount required to be spent for next three financial years.
- 6.4. The administrative overheads shall not exceed five percent of total CSR expenditure of the Company for a financial year.
- 6.5. Any surplus arising out of the CSR Program shall be dealt with in the manner specified under the Act;
- 6.6. The CSR Expenditure may be spent by the Company for creation or acquisition of a capital asset, in the manner specified under the Act.

## **7. CSR COMMITTEE**

**7.1. Constitution:** The CSR Committee comprises the following members:

- Mr S Viswanatha Prasad
- Ms Shilpa Sudhakar
- Mr Ravi Narasimham

**7.2. Responsibilities:**

- Formulate a CSR policy indicating the CSR Focus Areas to be supported for recommendation to the Board;
- Recommend the amount of CSR Expenditure to be incurred on the activities indicated in the CSR Policy;
- Formulate an Annual Action plan for the year for recommendation to the Board;
- Monitor the implementation of CSR Programs;
- Ensure periodic reporting to the Board on the progress of CSR Programs;
- Take necessary action for unspent amount, if any, at the end of the year;
- Carry such other functions as may be delegated to it by the Board under this Policy

## **8. BOARD'S RIGHTS AND RESPONSIBILITIES**

- Constitution and reconstitution of the CSR Committee
- Taking into account the recommendations made by the CSR Committee, approve the CSR policy for the Company.
- Ensure implementation of activities under this Policy
- Review and approve the recommendation of the Annual Action plan proposed by the CSR Committee and alter the same when required.
- Ensure 2% of the net profits or any other amount as prescribed under the Act is spent on CSR Programs
- Make the necessary disclosures and reports as specified in the Act (such as details of CSR Expenditure or the reasons for the unspent amount in the annual Directors' Report etc).
- Make modifications, if any, for smooth implementation of the project within the overall permissible time period.

## **9. CORPORATE SOCIAL RESPONSIBILITY REPORTING**

The Directors' Report of the Company shall include an annual report on CSR containing particulars in a specified format under the Act.

The Board shall mandatorily disclose the composition of the CSR Committee, CSR Policy and projects constituting the CSR Program on the website, for public access.

The impact assessment reports, if any, shall be placed before the Board and shall be annexed to the annual report on CSR.

## **10. AUDIT**

The Company's statutory auditor shall perform necessary audit procedures with respect to CSR Expenditure similar to auditing any other expense head. They shall also validate the end use and the Schedule VII (Companies Act 2013) category, under which expenses has

been incurred.

**11. POLICY REVIEW AND UPDATE**

The Policy shall be reviewed annually by the Board.

Further, the Policy shall be updated by the Policy Owner as and when necessary to ensure its effectiveness and compliance with applicable laws and regulations.

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**ANNEXURE I: VERSION CONTROL**

<b>Version No.</b>	<b>Version Approval Date</b>	<b>Version Effective Date</b>	<b>Version Change Details</b>	<b>Version Owner</b>	<b>Version Approved by</b>
1	31 March 2022	31 March 2022	First version	Mohini Devi	Board of Directors
2	March 22, 2024	March 22, 2024	Change in Composition of CSR Committee	Mohini Devi	Board of Directors
3	June 23, 2025	June 23, 2025	<ul style="list-style-type: none"> <li>• Included the following sections: <ul style="list-style-type: none"> <li>▪ Definitions</li> <li>▪ Annual Action Plan</li> <li>▪ CSR Expenditure</li> <li>▪ Corporate Social Responsibility Reporting</li> </ul> </li> <li>• Updated Roles and Responsibilities of CSR Committee and the Board</li> </ul>	Mohini Devi	Board of Directors