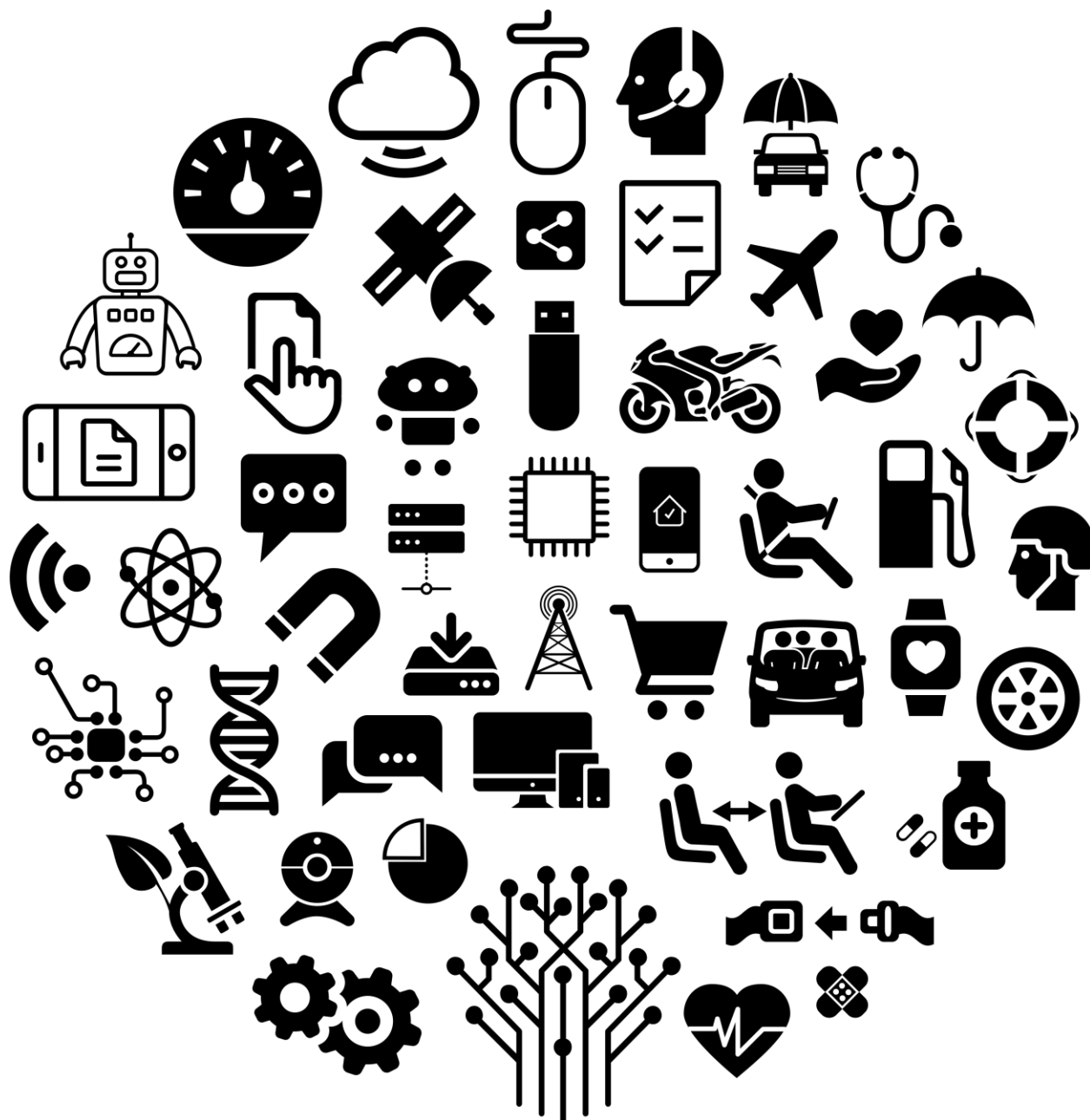




ACKO GENERAL INSURANCE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

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1. BACKGROUND:

Corporate Social Responsibility (CSR) is the way and means through which corporates can repay the society, by contributing the resources in its various forms as required for the efficient operation of the business. An organization must maintain highest standards of corporate behavior towards its employees, consumers and societies in which it operates.

IRDAI's (Corporate Governance for Insurers) Regulations, 2024 and Master Circular on Corporate Governance for Insurers, 2024 mandates Insurers to comply with CSR requirements as per Section 135 of the Companies Act, 2013. As per Section 135 of the Companies Act, 2013 following companies are required to formulate and adopt a Corporate Social Responsibility (CSR) Policy and draw out a framework for CSR:

- a) Net worth of Rs. 500 Crore or more; or
 - b) Turnover of Rs. 1000 Crore or more; or
 - c) Net profit of Rs. 5 Crore or more
- during the immediately preceding financial year

In accordance with the said mandate, since the Company qualifies in the above criteria, it is required to formulate and adopt CSR Policy.

2. OBJECTIVE:

The objective of this Policy is to provide an overall CSR framework, which shall at all relevant times be closely aligned with the requirements of relevant provisions of the Act.

3. APPLICABILITY:

This Policy shall be applicable in the event of eligibility of the Company to undertake CSR activities.

As per the Companies Act, the Company is required to spend not less than 2% of the three years' average Net Profits towards CSR activities. Hence this Policy shall be applicable once the Company has Net Profits.

4. CSR COMMITTEE:

As per sub section (9) of Section 135 of the Companies Act, 2013, where the CSR obligation does not exceed Rs. 50 lakhs, the requirement for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee shall, be discharged by the Board of Directors of such Company.

Accordingly, till the obligation as mentioned above is not triggered, till such time the CSR Committee shall not be constituted.

The references to the CSR Committee in the Policy shall mean the Board of Directors, till such time the CSR Committee is not constituted.

5. CSR ACTIVITIES/PROGRAMMES/PROJECTS:

The Company will endeavour to contribute and spend at least 2% of the average net profits of the Company made during the three immediately preceding financial years or such higher amount as may be recommended by the CSR Committee from time to time in pursuance of this Policy.

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged section of the society by one or more of the focus areas as outlined below.

The CSR Committee/ the Board as the case may be shall consider and approve CSR activities / programmes / projects to be undertaken during the year, from the below mentioned areas as specified in Schedule VII of the Companies Act, 2013 but not limited to:

- a. 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;
- b. Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- c. Promoting gender equality, empowering women, setting up homes and hotels 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;
- d. 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;
- e. 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;
- f. 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;
- g. Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
- h. Contribution to 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 socio-economic development and relief and welfare of the Schedule Castes, the Scheduled Tribes, other backward classes, minorities and women;

- i. 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
- j. 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).]
- k. rural development projects]
- l. slum area development.

Explanation.- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.]

- m. disaster management, including relief, rehabilitation and reconstruction activities.
- n. Any other activity as specified under the Act, as amended from time to time.

The list included above is just an indicative list and not an exhaustive list. The items included hereinabove are broad based and are to be interpreted liberally.

6. IDENTIFICATION & IMPLEMENTATION:

The CSR committee shall identify projects and oversee, supervise and provide guidance for their implementation. The Committee shall give preference to local areas and areas around it where it operates, while considering new CSR activities. The Committee shall explore various activities and filter and shortlist projects for CSR activities and recommend them for the approval of the Board.

7. CSR BUDGET:

The total budget (if applicable) for the CSR projects shall be decided by the CSR Committee in accordance with applicable provisions of the Act and the CSR Rules. The CSR Committee shall propose to distribute the budget among the areas to emphasize or such of them as the CSR Committee may deem fit in each financial year, in such proportion and in a manner that meets the objectives of the CSR Policy and recommend them for the approval of Board.

8. MONITORING & REPORTING:

The CSR Committee shall monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports etc. Mechanisms to track data and monitor projects will be established to ensure the transparency and efficiency of the implementation process. The projects will be evaluated against the milestones defined in the implementation plan of the project. The Committee shall appraise the Board the details and progress of the implementation from time to time.

The annual report on the CSR projects shall be published as a part of the Board's report. The report shall disclose information in the format as prescribed by the Section 135 of the Companies Act 2013.

The Chief Financial Officer or the person responsible for financial management shall certify that the funds so disbursed for CSR projects has been utilized for the purpose and in the manner as approved by the Board of Directors.

9. CSR ANNUAL ACTION PLAN:

An annual action plan in pursuance of its CSR Policy, shall be formulated, which shall include the following:

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

10. IMPACT ASSESSMENT:

Impact assessment, as and when mandated, will be undertaken by an independent agency and such impact assessment report shall be placed before the Board and annexed to the annual report of CSR.

11. DISPLAY ON WEBSITE:

The composition of CSR Committee, CSR Policy and Projects approved by the Board shall be displayed on the company's website.

12. REVIEW AND AMENDMENT:

The Board shall review the CSR policy and may amend as may be required basis the recommendation of the CSR Committee. In the event of any conflict between the provisions

of this Policy and statutory requirements, law shall prevail over the requirements mentioned in this Policy.
