

CORPORATE SOCIAL RESPONSIBILITY POLICY

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CONTENTS

1	SCOPE OF THE CSR POLICY	3
2	DEFINITIONS	3
3	GOVERNANCE	6
4	APPROACH AND DIRECTION OF THE BOARD	7
5	GUIDING PRINCIPLES FOR THE SELECTION OF A CSR PROGRAMME	8
6	CSR ANNUAL ACTION PLAN	9
7	IMPLEMENTATION MECHANISM	10
8	CSR PROGRAMMES	11
9	CSR EXPENDITURE	15
10	MONITORING & IMPACT ASSESSMENT	18
11	REPORTING AND DISPLAY OF CSR ACTIVITIES ON THE WEBSITE	20



1 SCOPE OF THE CSR POLICY

1.1	This Corporate Social Responsibility ("CSR") Policy of the Bank has been framed to fulfil the
	statutory obligations of the Bank under the provisions of Section 135 of the Companies Act, 2013
	read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

- 1.2 This CSR policy shall apply to all the direct and indirect expenditures incurred by the Bank in pursuance of its CSR obligations under Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.
- 1.3 The scope of this CSR policy shall not apply to the exclusions as mentioned in the definition of "Corporate Social Responsibility" in clause 2.1.4 or any other activities or expenditures that are not claimed as CSR expenditure in the Annual Report on CSR of the Bank.
- 1.4 The scope of this CSR Policy shall not apply to any donations made by the Bank to any bodies or persons towards the fulfilment of the provisions regarding the "Donations by the Bank" as mentioned in the Reserve Bank of India circular no. RBI.No./2005-06/237 DBOD.No.Dir.BC. 50/13.01.01/2005-06 dated December 21, 2005, or its subsequent amendments.
- 1.5 The CSR Policy of the Bank shall be reviewed and updated as and when required to incorporate the strategic CSR requirements of the Bank; amendments, if any, to the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 and any other applicable laws, rules regulations and regulatory frameworks.

2 DEFINITIONS

- 2.1 In this Policy, the following definitions of the terms used shall be applicable, unless the context requires otherwise.
 - 2.1.1 "Act" means the Companies Act, 2013 and its subsequent amendments, if any.



- 2.1.2 "Administrative Overheads" means the expenses incurred by the Bank for 'general management and administration of Corporate Social Responsibility functions. However, it shall not include the expenses that are directly incurred towards the designing, implementation, monitoring and evaluation of a particular CSR project or programme.
 - 2.1.3 "Annexure" means the Annexures appended to the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021.
 - 2.1.4 "Corporate Social Responsibility (CSR)" means the "CSR Programme", undertaken by the Bank, in pursuance of its statutory obligations laid down in section 135 of the Act in accordance with the provisions contained in the Rules, but shall not include the following:
 - 2.1.4.1 Activities that are undertaken in pursuance of the normal course of business of the Bank.
 - 2.1.4.2 Activities that are undertaken by the Bank outside India except for training of Indian sports personnel representing any State or Union territory at the national level or India at the international level.
 - 2.1.4.3 Contribution of any amount directly or indirectly to any political party under section 182 of the Act.
 - 2.1.4.4 Activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019).
 - 2.1.4.5 Activities supported by the Bank on a sponsorship basis for deriving marketing benefits for its products or services.
 - 2.1.4.6 Activities carried out for the fulfilment of any other statutory obligations under any law in force in India.
 - 2.1.5 "CSR Annual Action Plan" means the list of "CSR programmes" proposed to be undertaken by the Bank in a financial year as per its CSR Policy in the areas or subject specified in the Schedule VII of the Act and includes but is not limited to the following:



- 2.1.5.1 The amount of expenditure to be incurred on the CSR Programmes.
- 2.1.5.2 The implementation schedules and manner of execution of the proposed CSR programmes.
- 2.1.5.3 The modalities of utilisation of the funds of the proposed CSR programmes.
- 2.1.5.4 The monitoring and reporting mechanism of the proposed CSR programmes.
- 2.1.5.5 Details of any need assessment or any impact assessment studies proposed during the financial year.
- 2.1.6 "CSR and Sustainability Committee" or "CSRSCB" means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act.
- 2.1.7 "CSR Policy" means this Policy document, containing the approach and directions statement given by the Board of the Bank, taking into account the recommendations of its CSR Committee, and includes guiding principles for the selection, implementation and monitoring of the CSR projects or programmes or activities as well as the formulation of the 'CSR Annual Action Plan'.
- 2.1.8 "CSR Programme" means any CSR projects or programmes or activities, undertaken by the Bank as per its CSR Policy, that are in line with the activities in the areas or subjects as specified in the Schedule VII of the Act, as amended.
- 2.1.9 "CSR Programme Cost" means the expenditure incurred directly towards the designing, implementation, monitoring and evaluation of a particular CSR project or programme.
- 2.1.10 "International Organisation" means an organisation notified by the Central Government as an international organisation under section 3 of the United Nations (Privileges and Immunities) Act, 1947 (46 of 1947), to which the provisions of the Schedule to the said Act apply.



- 2.1.11 "Net profit" means the net profit of the Bank as per its financial statement prepared following the provisions of Section 198 of the Act, but shall not include the following:
 - 2.1.11.1 Any profit arising from any overseas branch or branches of the Bank, whether operated as a separate company or otherwise.
 - 2.1.11.2 Any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act.
- 2.1.12 "Ongoing Project" means a multi-year project undertaken by the Bank in fulfilment of its CSR obligation, having timelines not exceeding three years, excluding the financial year in which it was commenced, and shall include any such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.
- 2.1.13 "Public Authority" means 'Public Authority' as defined in clause (h) of section 2 of the Right to Information Act, 2005 (22 of 2005).
- 2.1.14 "Rules" means the Companies (Corporate Social Responsibility Policy) Rules, 2014 and its subsequent amendments lastly vide the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021.

3 GOVERNANCE

3.1 To oversee the fulfilment of the CSR obligations of the Bank, the Board of the Bank shall constitute a CSR and Sustainability Committee of the Board ('CSRSCB') by appointing at least three Directors, of which, at least one Director shall be an Independent Director. The CSRSCB shall meet at least once a year and/or as and when required. All CSRSCB meetings shall be attended by at least two members. The Board's report under sub-section (3) of section 134 shall disclose the composition of the Corporate Social Responsibility and Sustainability Committee.



- 3.2 The CSRSCB shall review and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Bank in areas or subjects, specified in Schedule VII. The CSRSCB shall monitor the Corporate Social Responsibility Policy of the Bank from time to time.
- 3.3 After taking into account the recommendations made by CSRSCB, the Board of the Bank shall approve the CSR Policy of the Bank and its amendments, with or without any modifications as deemed necessary. The Board shall disclose the contents of such Policy in its report and also place it on the Bank's website as prescribed in the Rules.
- 3.4 The Bank shall formulate a Standard Operating Procedure ('SOP'), in line with the Bank's CSR Policy for the general management and administration of the CSR functions. The MD&CEO of the Bank shall delegate the general management and administration of the CSR functions to appropriate officials of the Bank as deemed necessary. The SOP shall delineate the process of need assessment, planning and designing of CSR programmes, including the financial outlay, implementation schedules and manner of execution, modalities of utilisation of the funds, monitoring and reporting mechanism, evaluation and impact assessment, etc.

4 APPROACH AND DIRECTION OF THE BOARD

- 4.1 <u>Approach</u> Bandhan Bank is well aware of its corporate, social and environmental responsibilities and recognises that a good Environment, Social and Governance ("**ESG**") leads to a better trusteeship of all stakeholders. The CSR of the Bank is not just philanthropy, but it is a strong commitment to contribute to social and environmental growth and prosperity and is pivotal to its business sustainability.
- 4.2 <u>Purpose</u> The chief purpose of the Bank's CSR philosophy is to develop the community in which the Bank operates and make a sustainable improvement in the lives of economically, physically and socially challenged people living at the lower end of society and initiate or support programs that are aimed at creating conditions for better livelihood in these communities. The Bank shall also support measures that are aimed at preserving and enhancing the environment and natural resources. The CSR policy shall act as a mechanism for regulating the CSR activities of the Bank and adhere to laws and regulations in force and adopt best practices.



4.3 <u>Vision</u>- Aligned with the vision of the Bandhan Bank, the CSR initiatives of the Bank shall continue to enhance value creation, improve the quality of life and inclusion of those who are not adequately and effectively serviced by the formal financial sector into the mainstream of society and draw them into the cycle of growth by providing products and services and forming partnerships and alliances for the fulfilment of its role in the society as a responsible corporate.

5 GUIDING PRINCIPLES FOR THE SELECTION OF A CSR PROGRAMME

- 5.1 The CSR programmes of the Bank shall be in line with activities mentioned in this CSR Policy and/or the activities that fall within the areas or subjects, specified in Schedule VII of the Companies Act, 2013 and its subsequent amendments, if any.
- 5.2 The CSR programmes of the Bank shall preferably be within the local areas of the Bank's operations and/or as directed by the CSR and Sustainability Committee of the Board.
- 5.3 The Bank shall ensure that its CSR programmes are non-discriminatory and do not have any restrictive political or religious affiliations.
- 5.4 The CSR programmes of the Bank shall have a "Holistic Development" approach based on the prioritised needs of the local communities and shall have a multi-stakeholder engagement/partnership for building local ownership.
- 5.5 The CSR Programmes of the Bank shall have sustainability components for the withdrawal of the programmes, such that it is completed and handed over in a maximum period of four financial years including the year in which it started.
- 5.6 The beneficiaries of the CSR programme of the Bank shall generally be the relevant stakeholders, including local communities, customers, clients, vendors, family members of employees, employees as the general public, living in the catchments of the CSR programme and shall provide them equal opportunities on merit basis.



- 5.7 Activities that exclusively benefit the employees of the Bank shall not be considered as CSR expenditure, provided that any such CSR programmes like schools, hospitals, and training institutes, primarily created for benefit of the society at large through CSR budgets, may also be availed by the employees of the Bank, are eligible to be classified under CSR expenditure, provided that such facilities are not exclusively used by the employees.
- 5.8 The CSR programme of the Bank shall give preference to those local communities, who are living in extreme poverty or are having low income or a low asset base or are having physical or mental inadequacies, or low education, or have marginalised social status, or any other cause that deprived them of the mainstream.
- 5.9 The Bank shall sensitise its employees and shall build their capacities to volunteer for the CSR programme or activities of the Bank.
- 5.10 For achieving greater efficiency, better outcomes and a larger multiplier effect, the Bank shall use its corporate strategies, innovations and managerial skills for the implementation of its CSR programmes. Therefore, the CSR fund of the Bank should not be prioritised to be used as a source of funding for Government Schemes.

6 CSR ANNUAL ACTION PLAN

6.1 Pursuant to the Bank's CSR policy, the CSR and Sustainability Committee of the Board shall review and recommend for the Board's approval, a CSR Annual Action Plan delineating the CSR programmes to be carried out during the financial year, including its financial outlays, manner of execution, implementation schedules, modalities of utilisation of funds, and monitoring & reporting mechanism. After considering the recommendations of the CSRSCB, the Board of the Bank shall approve the CSR Annual Action Plan, with or without any modifications that may be deemed necessary.



6.2 The Board shall ensure that the activities included in the CSR Annual Action Plan are undertaken by the Bank. The MD&CEO of the Bank shall be able to approve any deviations to the CSR Annual Action Plan and/or may identify any other officials of the Bank to entrust them with the authority to approve any such deviations, which are made to any of the items of the CSR Annual Action Plan for business/administrative purposes, at any time during the course of the year, on account of some exigencies to meet the objectives drawn by the Bank, provided that such deviations shall be placed before the CSRSCB and the Board in its ensuing meeting for approval or ratification.

7 IMPLEMENTATION MECHANISM

- 7.1 The Bank shall assign the task of implementation of the CSR programmes to any implementing bodies/person as it may deem fit, according to the budgets and timelines of the Board's approved CSR Annual Action Plan.
- 7.2 The Bank may execute its CSR programmes directly by itself or through:
 - 7.2.1 A Section 8 company or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the Bank, either singly or along with any other company; or
 - 7.2.2 A section 8 company or a registered trust or a registered society, established by the Central Government or State Government; or
 - 7.2.3 Any entity (a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act) established under an Act of Parliament or a State legislature; or
 - 7.2.4 A Section 8 company, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and 80G of the Income Tax Act, 1961, and has an established track record of at least three years of successful implementation of similar CSR programmes.



- 7.3 The Bank shall execute its CSR programmes through any/all of the above-mentioned bodies, provided that they fulfilment of the following clause
 - 7.3.1 The implementing bodies have registered themselves with the Central Government by filing the form CSR-1 electronically with the Registrar, with effect from the 01st day of April 2021.
 - 7.3.2 Provided that any CSR projects or programmes approved before the 01st day of April 2021 shall not be affected.
- 7.4 The Bank may execute the CSR programmes in collaboration with other banks or corporates as it may deem fit in such a manner that the respective entities are in a position to report separately on such projects or programmes as per the Act and the Rules framed thereunder.
- 7.5 The Bank may engage international organisations for designing, monitoring and evaluation CSR projects or programmes as well as for the capacity building of their own or implementing bodies personnel for CSR.
- 7.6 The Bank may contribute any unspent CSR funds, other than the funds allocated towards any ongoing projects, to any of the funds as specified in the Schedule VII of the Companies Act, 2013.

8 CSR PROGRAMMES

8.1 The focus area of the CSR programmes of the Bank shall be the local areas served by the Bank and based on the prioritised needs of the local communities, the Bank may undertake any or all of the activities in the subject or the areas as mentioned in the Schedule VII of the Act and/or are in following the areas or subjects:



- 8.1.1 <u>Healthcare and Preventive Health:</u> Health care at its essential core is widely recognized to be a public good. The Bank shall contribute to the CSR programme that makes health care affordable. Health care shall not only cover medical care but also pro-preventive health care.
- 8.1.2 <u>Sanitation and Safe Drinking Water:</u> The Bank may contribute to the CSR programme related to sanitation, construction of toilets, and providing safe drinking water. The Bank may also contribute to the Swach Bharat Kosh set up by the Central Government for the promotion of sanitation.
- 8.1.3 <u>Food Security:</u> The Bank may contribute to the CSR programmes that facilitate alleviating extreme poverty, eradicating hunger and enhancing food security and nutritional outcomes.
- 8.1.4 <u>Education</u>: Education is the steady building block of any nation. The Bank may contribute to CSR programmes that promote quality education amongst the economically or socially deprived sections of society or are physically or mentally challenged. Within the scope of education, the CSR programmes shall aim at bridging the education gaps through the following initiatives:
 - 8.1.4.1 Vocational education and training
 - 8.1.4.2 Financial and digital literacy
 - 8.1.4.3 Formal / Non-Formal education for the homeless or migrant or slum or the rural poor children
 - 8.1.4.4 Special or inclusive education or training for persons who are physically or mentally challenged.



- 8.1.5 <u>Skills Development:</u> A growing economy like India requires a large and skilled workforce. The Bank may contribute to the CSR programmes which undertake skill training initiatives that are aimed at training and capacity building of youth and women from economically weaker sections of society and empower them to gain access to opportunities for sustainable livelihood and growth. The Bank will support technical training courses, creating training/ skill development centres, non-formal vocational programmes aimed at creating livelihood opportunities, soft skill training aimed to facilitate integration into the mainstream and soft loans for self-financing of training.
- 8.1.6 <u>Sustainable Livelihood Development:</u> The Bank may contribute to the CSR programmes that support sustainable livelihood development and women's economic empowerment initiatives, including capacity building, asset grants and consumption stipends to support any farm and /or non-farm-based sustainable income generation activities. The Bank may also contribute to any CSR programmes that support the capacity building of farmers on-farm innovations, value chain development and creating market linkages.
- 8.1.7 Reducing Inequality: The Bank may contribute to any CSR programmes aimed at promoting gender equality, and women empowerment, setting up homes and hostels for tribal, disabled persons, 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.
- 8.1.8 Environment, Natural Resource Management and Climate Change: The Bank may support CSR programmes related to the protection of the environment and reducing ecological footprint through the promotion of clean development mechanisms and technologies, energy-efficient technologies, and renewable energies. The Bank may also take up initiatives for promoting clean air, clean water, maintaining soil quality and solid waste management. The Bank may contribute to the CSR programmes that are aimed at climate change adaptation and carbon sequestration, including, the promotion of climate-resilient farming, developing climate-smart villages, creation of water harvesting structures, integrated watershed management, combating desertification, flood control, afforestation, agroforestry, biodiversity conservation and preservation of local flora and fauna. The Bank can also contribute to the Clean Ganga Fund set up by the Central Government for the rejuvenation of River Ganga.



- 8.1.9 <u>Promotion of National Heritage, Art, Culture, Handicrafts and Sports:</u> The Bank shall support the initiatives that are aimed towards supporting traditional arts and handicrafts and artisans, create platforms to showcase various products and services and help in the market linkages and value chain development. The Bank may also support the CSR initiatives that promote sports, training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports and sports-related infrastructure.
- 8.1.10 <u>Development of Defence Veterans:</u> The Bank may contribute towards any CSR programme that undertakes the measures for the benefit of armed forces, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, widows and their dependents.
- 8.1.11 Contribution to funds set up by the central government: The Bank may contribute 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 socioeconomic development and relief and welfare of the scheduled caste, tribes, other backward classes, minorities and women.
- 8.1.12 Research and Development: The Bank may contribute to any CSR programme that supports any 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. The Bank may also make contributions to any public-funded universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under the 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 Defence 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).



- 8.1.13 <u>Promotion of Rural Development and Slum Area development:</u> The Bank will support CSR activities for the promotion of digital payments, banking, providing financial and insurance services for financial inclusion to unbanked rural and slum areas and creating innovative solutions to suit the requirements of the rural and slum area. The Bank may also support CSR programmes that are aimed at developing necessary infrastructure/facilities for farm/non-farm activities, including any production, processing, storage, logistics, supply chain or marketing facilities.
- 8.1.14 Physical Living Condition: The Bank may contribute to a CSR programme that aims to improve the physical living conditions, especially in the rural and slum areas through better housing, providing facilities like solar lighting for communities and schools, help in building parks, roads etc.
- 8.1.15 <u>Disaster Management:</u> The bank may also choose to contribute to disaster management, including relief, rehabilitation and reconstruction activities.
- 8.1.16 <u>Any Other Activities</u>: Such other CSR programmes, as required, provided it falls in the areas or subject related to Schedule VII of the Companies Act, 2013 as amended.
- 8.2 The Bank may choose to fund any or all or selected or inter-alia of the above-mentioned CSR programmes, as it may deem fit or as per the prioritised needs of the local communities or to fulfil any other such CSR obligation arising from requests by any government/regulatory authorities.
- 8.3 New areas may be added as and when required with the recommendation of the CSR Committee and approval of the Board.

9 CSR EXPENDITURE

9.1 **CSR Obligation** – The Board of the Bank shall ensure that the Bank spends, in every financial year, at least two per cent of the average net profits made during the three immediately preceding financial years in pursuance of its Corporate Social Responsibility Policy.



- 9.2 **Administrative Overheads** The Board shall ensure that the administrative overheads shall not exceed five per cent of total CSR expenditure for the financial year.
- 9.3 **Fund Utilisation** The Board of the Bank shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- 9.4 **Unspent CSR Amount** If the Bank fails to spend the prescribed CSR amount of any financial year, the Board shall, in its Board Report shall specify the reasons for not spending such amount. For any unspent amount remaining against the prescribed CSR amount, the Board of the Bank, on the recommendation of the CSR Committee can choose to carry forward the unspent amount to the subsequent three financial years, provided it is over and above that year's prescribed CSR spend and should follow the following provisions:
 - 9.4.1 Any unspent amount towards any ongoing CSR programme shall be transferred by the Bank within a period of thirty days from the end of the financial year to a special account to be opened by the Bank on behalf of the financial year in any scheduled bank to be called the "Bandhan Bank Limited Unspent Corporate Social Responsibility Account" followed by the suffix of the Financial Year.
 - 9.4.2 Such unspent amount towards the ongoing CSR programmes shall be spent by the Bank within a period of three financial years from the date of such transfer from the said account, failing which, the Bank shall transfer any remaining unspent balance of such account at the end of the third financial year to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.
 - 9.4.3 In case, if there is an excess of any unallocated unspent amount, other than the unspent amount towards ongoing CSR programmes, the Bank will transfer such amount to a Fund specified in Schedule VII, within a period of six months from the end of the financial year.



- 9.4.4 In case, the Bank is not able to spend its prescribed CSR expenditure as per the above provisions, the Bank shall be liable to a penalty of twice the amount required to be transferred by the Bank to the Fund specified in Schedule VII or the Unspent Corporate Social Responsibility Account, as the case may be, or Rupees One Crore, whichever is less, and every officer of the Bank who is in default shall be liable to a penalty of one-tenth of the amount required to be transferred by the Bank to such Fund specified in Schedule VII, or the Unspent Corporate Social Responsibility Account, as the case may be, or Rupees Two lakh, whichever is less.
- 9.5 **Excess CSR spends** In case, if the Bank spends any amount in excess of the prescribed CSR spends in a financial year, then the same can be set off against the prescribed CSR spent in the immediately three succeeding financial years, provided that the excess amount spent / available for set-off shall not include the surplus arising out of the CSR activities and the Board of the Bank shall pass a resolution to that effect.
- 9.6 **CSR Surplus** Any surplus arising out of the CSR activities shall not form part of the business profit of the Bank any kinds of income accrued by way of CSR activities shall be ploughed back into the same CSR programmes or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the Bank 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.
- 9.7 **Impact Assessment Spends** The Bank may incur an expenditure of up to two per cent of the total CSR expenditure, or Rupees Fifty Lakh, whichever is higher in a financial year, which shall be over and above the five per cent limit of administrative overheads, for undertaking impact assessment of the CSR programmes.
- 9.8 **Capital Asset** The CSR amount may be spent by the Bank for the creation or acquisition of a capital asset, which shall be held by –
- 9.8.1 A company established under section 8 of the Act, or a Registered Public Trust or a Registered Society, having charitable objects and CSR Registration Number; or



- 9.8.2 The beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
- 9.8.3 A public authority.
- 9.9 Any capital asset created by the Bank through its CSR Funding, before 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.

10 MONITORING & IMPACT ASSESSMENT

- 10.1 Monitoring of CSR Policy The Corporate Social Responsibility Committee shall formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Bank in areas or subjects, specified in Schedule VII. The Board of the Bank, after taking into account the recommendations made by the Corporate Social Responsibility Committee shall approve the Corporate Social Responsibility Policy for the Bank and disclose the contents of such Policy in its report and also place it on the Bank's website, as prescribed in the Rules.
- 10.2 The CSRSCB shall be responsible for the overall monitoring of the Corporate Social Responsibility Policy of the Bank. The MD&CEO of the Bank shall be empowered to approve the amendments that need to be made in the CSR Policy on account of the regulatory changes or for business / administrative purposes, during the course of the business on account of any exigencies to meet the objectives of this Policy, provided that such changes are placed before the CSRCB / the Board of the Bank in its ensuing meeting for ratifications.
- 10.3 **Monitoring of the CSR Programme** The monitoring and reporting mechanism of the CSR programme undertaken by the Bank, including any requirement for need or impact assessment, shall be incorporated in the CSR Annual Action Plan.



- 10.4 The implementing person/bodies shall carry out the task of implementation of the CSR programme, as assigned by the Bank within the specified budgets and timeframes and shall report back to the Bank on the progress thereon at such frequency as the Bank may direct.
- 10.5 The Bank shall review the progress of the implementation of the CSR programmes once a quarter and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Programmes in accordance with this Policy.
- 10.6 The Bank shall submit a six-monthly progress report to the CSRSCB or at a frequency as directed by the CSRSCB. The report shall include a summary of the physical and financial achievements of the CSR programmes, and the summary of the impact assessment reports (if any). In case of any ongoing projects (having a timeline of more than one year), the progress of their implementation shall be with reference to the approved timelines and year-wise allocations.
- 10.7 The aforesaid report shall include the confirmation from the Chief Financial Officer that the funds disbursed for the CSR Programmes have been utilised for the stated purpose and in a specified manner.
- 10.8 The Board of the Bank shall ensure that the activities included in the CSR Annual Action Plan of the Bank are undertaken following its Corporate Social Responsibility Policy.
- 10.9 The MD&CEO shall be able to authorise any officials of the Bank as deemed necessary for the monitoring and reporting of the progress of the implementation of the CSR programmes, including the ongoing projects, with reference to the Board's approved timelines and year-wise allocation and also to make any modifications, as deemed necessary for the smooth implementation of the project, provided that such modifications shall be placed for the review of the CSRCB and to the Board in its ensuing meeting for ratification.
- 10.10 At the end of the financial year, the CSRSCB shall review and recommend to the Board for the approval of the Annual Report on CSR, which shall include the impact assessment report (if any).



10.11 Impact Assessment – The Bank shall undertake an impact assessment, through an independent agency, of its CSR programme that has an outlay of Rupees One Crore or more, and which has been completed not less than one year before undertaking the impact study.

11 REPORTING AND DISPLAY OF CSR ACTIVITIES ON THE WEBSITE

- 11.1 The Board's Report of the Bank shall include an Annual Report on CSR containing particulars as specified in the applicable Annexures of the Companies (CSR Policy) Amendment Rules, 2021.
- 11.2 The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.
- 11.3 The Board of the Bank shall disclose the following on its website for public access:
 - 11.3.1 The composition of the CSR Committee
 - 11.3.2 The CSR Policy of the Bank
 - 11.3.3 CSR programmes as approved by the Board for public access.