

# *CORPORATE SOCIAL RESPONSIBILITY POLICY*

## **OUR VISION**

*“Our Vision is to facilitate a Humane, Sustainable and Inclusive Society”*

## **OUR MISSION**

*“Our mission is to lead a Social Transformation through interventions in areas of Education, Health, Environment and Heritage”*

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## **1. INTRODUCTION**

Cosmo Corporate Social Responsibility Policy (the “**CSR Policy**”) is framed in accordance with the provisions of Section 135 of Companies Act, 2013 (the “**Act**”) read with Companies (Corporate Social Responsibility Policy) Rules, 2014 (the “**CSR Rules**”) by the Board of Directors (the “**Board**”) of Cosmo First Limited (the “**Company**”) on the recommendations of Corporate Social Responsibility Committee (the “**CSR Committee**”) constituted by the Board in accordance with the provisions of the Act.

The terms not referred to herein and not defined anywhere in this Policy shall have the meaning ascribed thereto in the Act read with the CSR Rules, as amended from time to time. In the event of any inconsistency between the definition in this Policy and Act and the CSR Rules, the definitions as given in the Act and the CSR Rules shall prevail.

## **2. MODE OF IMPLEMENTATION**

The Company would work through its CSR arm Cosmo Foundation or any other entity set up in accordance with requirement of the Companies Act 2013 in close collaboration with communities, like minded agencies and govt. for its education, vocational skills, preventive health, livelihood, rural development programs or may other programs that may come up in future upon suggestion from the CSR committee.

## **3. FOCUS AREA**

The CSR Committee in consultation with Cosmo Foundation and/or other agencies will identify, formulate and recommend the CSR programs and projects from among the areas or subjects specified in Schedule VII of the Act. The said programs and projects will be approved by the Board of Directors of the Company.

Our CSR programs and projects will focus on the following objectives:

- Create quality learning environment that enables children to acquire skills, analytical thinking, values and realize their talent
- Create a strong foundation for mainstream education through foundational, digital literacy and English skills to enable higher education and employment.
- Promote wellbeing of elderly, abandoned and marginalized population
- Promote environmental sustainability, public health and hygiene.
- Protect, preserve and promote national art, heritage and culture.

The Board of Directors may from time to time approve any CSR program or project as ‘Ongoing Project’ and allocate or re-allocate the funds for such projects in accordance with the CSR Rules.

#### **4. CSR Budget**

Our CSR spent will be in accordance with the provisions of the Act and the CSR Rules.

The CSR Committee, in consultation with the Cosmo Foundation and/or other agencies will propose the Annual Action Plan together with planned spent on the CSR Activities for consideration and approval of the Board of Directors. The annual action plan and/or the planned spent may be altered by the Board on the recommendations of the CSR Committee.

#### **5. CSR EXPENDITURE**

CSR Expenditure will include all expenditure incurred in accordance with the Annual Action Plan including any other activity aligned with areas or subjects specified in Schedule VII of the Act.

Expenses on general management and administration of CSR function may be incurred by the Company in accordance with the CSR Rules.

Any surplus arising from CSR activities shall not be considered as part of the business profit of the Company and shall be ploughed back for CSR activities.

Excess amount, if any incurred over the minimum required spent for the year in terms of the provisions of the Act and CSR Rules may be carried forward for set off against spend in the succeeding years in accordance with the CSR Rules.

Unspent amount, if any relating to ‘Ongoing Project’ or otherwise shall be dealt with in accordance with the CSR Rules.

#### **6. IMPACT ASSESSMENT**

The Company shall, if and when required, undertake an impact assessment of its CSR projects in accordance with provisions of the Act and CSR Rules.

## **7. CSR COMMITTEE**

The Company's CSR Governance structure will be headed by Corporate Social Responsibility Committee of the Board of Directors of the Company.

The CSR Committee shall,—

- a) formulate and recommend to the Board a CSR Policy;
- b) formulate and recommend to the Board an Annual Action Plan in pursuance of the CSR policy which shall include the following:
  - the list of CSR projects or programmes to be undertaken in the areas or subjects specified in Schedule VII of the Act;
  - the manner of execution of the CSR projects or programmes;
  - the amount expenditure to be incurred on CSR projects or programs and the modalities of utilisation of funds;
  - implementation schedules for the CSR projects or programmes;
  - monitoring and reporting mechanism for the CSR projects or programmes; and
  - impact assessment, if any, to be undertaken for the CSR projects programmes.
- c) monitor from time to time the progress of CSR projects and programs as per Annual Action Plan
- d) any other activity as may be required with respect to CSR function.

The CSR Committee may in discharge of their responsibility consult Cosmo Foundation and/or other agencies as it deems fit and proper.

The CSR Committee may invite the Company's official, the trustees and officials of the Cosmo Foundation and any other persons as it deems fit and necessary to the meeting of the CSR Committee.

## **8. LOCATION**

CSR projects or programs under this policy shall be undertaken in India as per the recommendations of the CSR Committee and approval by the Board.

## **9. MONITORING**

The CSR Committee shall endeavour to devise a robust monitoring system to ensure the effective implementation of the CSR projects and programmes.

## **10. DISCLOSURES**

The CSR Committee shall ensure that appropriate disclosures are made on the website of the Company and in the Company's Annual Report.

### **REVISION HISTORY OF CSR POLICY**

<b>1st Version</b>	Approved by the Board on 22 <sup>nd</sup> May, 2015	Effective from 22 <sup>nd</sup> May, 2015
<b>2nd Version</b>	Approved by the Board on 27 <sup>th</sup> October, 2021	Effective from 27 <sup>th</sup> October, 2021