



Corporate Social Responsibility Policy



Version 2.0

Latest update: 2025

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| Owner | : Company Secretary |
| Reviewer | : CSR Committee |
| Timeline for next updation | : First CSR Committee meeting of F.Y. 2026-27 or in case of new amendment (whichever is earlier). |





POLICY FOR CORPORATE SOCIAL RESPONSIBILITY

I. INTRODUCTION:

Adama India Private Limited is a leading manufacturer and distributor of crop protection solutions, supplying efficient solutions to farmers across the full farming value-chain with a focus on understanding and meeting the needs of Indian farmers. With our complete portfolio of solutions, we put into practice our purpose of bringing simplicity to agriculture.

II. SHORT TITLE:

This policy in relation to the Corporate Social Responsibility ("**CSR**") of Adama India Private Limited is titled as the "**CSR Policy**" and shall include any alterations, amendments or modifications hereto from time to time.

III. VISION STATEMENT, OBJECTIVE AND APPLICABILITY:

1. The CSR Policy sets out our commitment to ensuring that our activities extend beyond business and include initiatives and endeavours for the benefit and development of the community and society. The CSR Policy lays down the guidelines for undertaking the CSR Activities as defined hereunder. This Policy contains the approach and direction followed by the Board considering the recommendations of CSR Committee, and includes guiding principles for selection, implementation, and monitoring of CSR activities as well as formulation of the annual action plan.
2. This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act, 2013 ("**Act**") and the rules issued thereunder.
3. Notwithstanding anything to the contrary contained in this CSR Policy but subject to applicable laws of India, in the event, the Company fails to meet the thresholds set out under Section 135(1) of the Act for three consecutive financial years, it shall not be required to:
 - a. Constitute/maintain the CSR Committee; and
 - b. Comply with the provisions of this CSR Policy

till such time as it again meets the criteria specified in Section 135(1) of the Act.

IV. DEFINITION AND INTERPRETATION:

1. "**Board**" means the Board of Directors of the Company.
2. "**Company**" means Adama India Private Limited.





3. **"CSR Activities"** means such programs and projects as may be approved by the Board in terms of this CSR Policy.
4. **"Ongoing Project"** means a multi-year project undertaken by the Company in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced and shall include 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.
5. **"CSR Committee"** means a committee constituted by the Board of Directors in terms of Section 135 of the Act and the CSR Rules.
6. **"CSR Rules"** means the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.
7. **"CSR Expenditure"** means the amount recommended by the CSR Committee to be incurred on the CSR Activities in India in terms of the Act and the CSR Rules as approved by the Board from time to time.
8. **"Net Profits"** means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include (i) any profit arising from any overseas branch or branches of the Company (whether operated as a separate Company or otherwise); and (ii) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act.

The average net profit for the purpose of determining the spending on CSR activities is to be computed in accordance with the provisions of section 198 of the Act and will also be exclusive of the items given under rule 2(1)(h) of the Companies (CSR Policy) Rules, 2014. Section 198 of the Act specifies certain additions/deletions (adjustments) to be made while calculating the net profit of a Company (it excludes capital payments/receipts, income tax, set-off of past losses).

Profit Before Tax (PBT) is used for computation of net profit under section 135 of the Act.

9. **Administrative overheads** mean the expenses incurred by the Company for 'general management and administration' of Corporate Social Responsibility functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme;
- ➔ Any term not defined above, shall have the meaning assigned to it under the Companies Act, 2013 or the CSR Rules.





V. IMPLEMENTATION OF THE CSR POLICY

1. At the apex level, the Board has the authority to approve the CSR Policy and expenditure under various CSR initiatives while ensuring that the Company spends 2% of the average net profit made during the three immediately preceding financial years (FY).
2. The Board shall be responsible for the implementation of the CSR Policy and shall ensure that CSR activities are undertaken in accordance with the provisions of the CSR Policy, the Companies Act, 2013, the applicable CSR Rules, and the annual action plan as formulated and recommended by the CSR Committee.

Furthermore, the Board shall ensure appropriate disclosure of all CSR activities and related expenditure in the Annual Report of the Company, in the format prescribed under Annexure-II of the CSR Rules. The Board shall also ensure that the CSR Policy and details of the CSR Committee are uploaded and made accessible on the Company's website.

3. Mode of Implementation: The CSR Activities may be undertaken by the Company directly or with the prior approval of the Board, through any of the following entities as **"Implementation Agency"** being duly registered with the Central Government and having a unique CSR Registration Number (with effect from 1 April 2021):
 - i. Company established under section 8 of Indian Companies Act 2013, or Trust, or Society registered under section 12-A and 80-G of the Income Tax Act 1961, being established by the Company, either singly or along with any other Company;
 - ii. Company established under section 8 of Indian Companies Act 2013, or Trust, or Society, being established by (Indian) Central Government or (Indian) State Government;
 - iii. Company established under section 8 of Indian Companies Act 2013, or Trust, or Society registered under section 12-A and 80-G of the (Indian) Income Tax Act 1961, and having an established track record of at least three years in undertaking similar CSR activities; or
 - iv. Any entity established under an act of (Indian) Parliament or a (Indian) State Legislature.
 - v. The Implementing Agency must not have any direct or indirect affiliation with any political party, as such associations could compromise the integrity and objectives of the initiative.
 - vi. The Implementing Agency must maintain complete independence and avoid any conflict of interest with the Company's employees. No employee of the Company, nor their family members, should receive any form of direct or indirect benefit from the Agency.





4. The Corporate Communication Manager shall carry out thorough due diligence before finalizing any entity as an Implementing Agency. This process shall include, among other things, the verification of the proposed agency's credentials to ensure its eligibility, credibility, and capability to effectively carry out the CSR activities on behalf of the Company.

Additionally, the Corporate Communication Manager shall define, in clear and unambiguous terms, the scope of work, key deliverables, timelines, and other relevant expectations for the Implementing Agency. These terms shall be formally documented in a Memorandum of Understanding (MoU) or other legally binding agreement, prepared in consultation with and with the assistance of Legal Department, to be executed between the Company and the selected Implementing Agency, following the recommendation of the CSR Committee and approval by the Board.

5. The Corporate Communication Manager, in consultation with the Company Secretary or Legal Department, shall be responsible for formulating the Annual CSR Action Plan for each financial year, guided by the following principles:

❖ **Selection of CSR Activities:**

Identify focus areas based on local needs, national priorities, environmental impact, and resource-deprived regions. Allocate CSR funds strategically to ensure meaningful and measurable outcomes.

❖ **Implementation Approach:**

Decide whether projects will be executed directly or through Implementing agencies. Implementing agencies must meet defined criteria such as conflict-free operations, apolitical background, strong due diligence results, and a credible performance history.

❖ **Monitoring Mechanism:**

Establish clear monitoring protocols, including frequency of reviews, site visits (if required), responsible personnel, and documentation standards to track progress and ensure accountability.

❖ **Project Planning and Compliance:**

Evaluate the suitability of long-term vs. short-term projects, ensuring compliance with environmental, legal, and regulatory requirements. Determine the need and frequency for impact assessments where applicable.

6. The Company may engage international organizations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR policy as well as for capacity building of their own personnel for CSR.

The Company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with these rules.





The Company may collaborate with the group companies / affiliates in consultation with the CSR committee, to identify, conduct due diligence and contribute to CSR projects. As part of such collaboration, any one of the Adama India collaborating group companies / affiliates may engage with Implementation Agencies (including execution of the appropriate memorandum of understanding or any other documents as approved by the CSR Committee) on behalf of the Company.

7. The Board shall empower the CSR Committee to finalize, approve and execute various agreements, deeds, writings, confirmations, undertakings or other documents, as may be necessary, with any party including Implementing Agencies and/or others for the purposes of the CSR Policy and accept modifications, changes and amendments to any such documents/ agreements as it may deem fit.
8. In case of failure to ensure the minimum CSR Expenditure i.e., 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years, detailed reasons for the same should be submitted by the CSR Committee to the Board. Further the Board shall duly include such explanation in their annual Boards' report prepared under the Act for a financial year.

VI. CSR COMMITTEE

1. 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.

Constitution of Corporate Social Responsibility Committee:

As per the Act, the Board of Directors of the Company shall constitute a Corporate Social Responsibility Committee of the Board ("CSR Committee") consisting of three or more directors, out of which at least one director shall be an independent director. As per Rule 5 of CSR Rules, 2014 an Unlisted Company or a Private Company covered under sub-section of section 135 which is not required to appoint an independent director pursuant to sub-section (4) of section 149 of the Act, shall have its CSR committee without such director.

2. The CSR Committee shall meet at least twice in every financial year or at such frequencies as the Chairman of the CSR Committee deems appropriate. The quorum for meetings of the CSR Committee shall be at least two members or 1/3rd of the members, whichever is higher.
3. Notwithstanding anything to the contrary, the Board shall not be obliged to comply with the recommendations of the CSR Committee.
4. All CSR activities and expenses made thereon will be subject to audit by CSR Committee members and Board.





5. The CSR Committee as deem fit may direct the Corporate Communication Manager to publish/disseminate the information relating to the CSR Activities undertaken by the Company, on recognized social media, public and professional platforms, as may be deemed appropriate subject to policies of the Company, with the objective of ensuring visibility, transparency, and stakeholder awareness regarding the Company's contribution to society through its CSR Activities.
6. The number of members of the CSR Committee and their powers and functions can be specified, varied, altered or modified from time to time by the Board, subject to the provisions of the applicable law.
7. The CSR Committee shall monitor the CSR Policy of the Company from time to time.
8. Without prejudice to the generality of the foregoing, the CSR Committee shall be responsible for the following activities:
 - a. Formulating and recommending CSR Policy to the Board of Directors;
 - b. Recommend amount of expenditure to be incurred on CSR activities;
 - c. Monitor CSR policy of the Company; and
 - d. Formulate and recommend to the Board of Directors, an annual action plan in pursuance of the CSR policy in accordance with the applicable law, and inclusive of the following items:
 - i. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - ii. recommending to the Board, the local and other areas in which the Company may undertake CSR Activities;
 - iii. the manner of execution of such projects or programmes;
 - iv. the modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - v. monitoring and reporting mechanism for the projects or programmes; and
 - vi. details of need and impact assessment, if required under the Act, for the projects undertaken by the Company.
 - vii. encouraging employee participation, including employees from local areas, involving them in driving and supporting CSR Activities in and around the local and regional areas where the Company operates/has its business presence.

Provided that Board may alter such annual action plan at any time during the financial year, as per the recommendation of CSR Committee, based on the reasonable justification to that effect. Additionally, the annual action plan shall change for each financial year as it is a manifestation of the guiding principles mentioned in this CSR Policy, as may be relevant for each financial year.

Provided further that Board may also recommend that the annual action plan shall, to the extent practicable, speak about the expectations to be achieved during the next financial





year, thereby ensuring continuity and strategic alignment of CSR Activities over multiple years.

9. The CSR Committee shall hold meetings which shall be attended by minimum of two members of the Committee. The meetings shall be held at the registered office or at any other place as may be agreed by the members of the CSR Committee.
10. Any questions, discrepancies, or issues arising from the implementation of the CSR Policy or related initiatives shall be referred to the CSR Committee for review and input. The final decision, determination, or interpretation shall rest with the Board of Directors.
11. The Board of the Company shall after considering the recommendations made by the CSR Committee, approve the policy for the Company and disclose contents of such Policy in its report and ensure that the activities as are included in the CSR Policy of the Company are undertaken by the Company.
12. The CSR Committee shall provide the vision under the leadership of the Managing Director/ Chief Executive Officer of the Company.
13. At the Company, the Managing Director/Chief Executive Officer serves as the mentor for CSR initiatives, providing strategic guidance. The responsibility for the successful and timely implementation of CSR activities and projects lies with the Corporate Communication Manager, who will execute the programs under the guidance of the People Department's Head.
14. No member of the CSR Committee shall be personally liable for any decision or action taken in good faith with respect to the CSR Policy.
15. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference should be made to CSR Committee. In all such matters, the interpretation and decision of the CSR Committee shall be final.

VII. BUDGETS FOR CSR EXPENDITURE

1. 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.
2. As per the Companies Act, 2013, CSR expenditures are mandatory in nature and do not provide the Company any material return on investment. The objectives of CSR expenditures are to: -
 - Support Company's stakeholders, societies and the communities in which the Company operate.
 - Promote the Company's brand globally and locally in alignment with its purpose, vision and Code of Conduct.





- Advance the Company's commitment to sustainability.
- Engage employees with communities.

Payments made with a direct commercial interest - such as payments in exchange for the provision of a service (e.g. consultancy, scientific research), to promote Company's products or as part of a sales or marketing campaign - do not qualify as CSR expenditures.

To the extent possible, the CSR expenditures shall be for longer term to benefit public at large in need of assistance, ideally with a lasting effect. CSR expenditures can comprise transfer of money, goods, know-how with the aim of creating a sustainable and long-lasting positive impact.

Beneficiaries must be a not-for-profit group or organization and should not include parties with religious or political motivations. Payments to trade and business associations do not qualify as CSR expenditures.

All CSR expenditures should be made in line with the Code of Conduct and Anti-Bribery Policy of the Company. In general, CSR expenditures must not be made to organizations that include or is in any way linked to a Public Official, as defined by the Anti-Bribery Policy of the Company. The Company is committed to upholding the highest ethical standards in all CSR activities / initiatives. No employee, director or any person involved in CSR activities shall engage in unethical practices or use their position to create conflicts of interest or political affiliations. This ensures that CSR efforts are conducted with utmost integrity, transparency, and accountability.

3. 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.
4. The Board shall be responsible for sanctioning the CSR Expenditure and along with the CSR Committee responsible for taking steps to ensure that the amount for the CSR Expenditure is available to the Implementation Agency for application towards the CSR Activities.
5. Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company and may only be re-allocated to the CSR Activities being undertaken in terms of this CSR Policy and the annual action plan for the financial year in which such surplus has arisen.
6. In order to count towards CSR Expenditure, CSR Activities must be undertaken in compliance with the applicable laws and shall not include the following:
 - i. activities undertaken in pursuance of normal course of business of the Company and any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
 - ii. contribution of any amount directly or indirectly to any political party under Section 182 of the Act;





- iii. activities benefitting employees of the Company as defined in clause (k) of Section 2 of the Code on Wages, 2019 (29 of 2019);
 - iv. activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services; and
 - v. activities carried out for fulfilment of any other statutory obligations under any law in force in India;
 - vi. Projects/activities not falling within Schedule VII (i.e., activities mentioned under CSR initiatives and programs).
7. The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.
8. In case Company fails to spend such amount, the Board shall specify the reasons for not spending the amount and report it as per section 134(3)(o).
9. CSR expenditure shall include all expenditure incurred for the various areas as previously mentioned however it does not include any expenditure on any item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Companies Act 2013. Tax treatment of CSR spent will be in accordance with applicable tax laws.

VIII. CFO CERTIFICATE

The Chief Financial Officer (CFO) of the Company, or the person responsible for the financial management of the Company, shall certify to the Board of Directors that the funds disbursed for CSR activities have been utilized for the approved purposes/projects and in the manner approved by the Board, in accordance with the provisions of the Companies Act, 2013 and applicable rules.

Such certification shall be placed before the Board to ensure compliance and proper monitoring of CSR fund utilization.

IX. CSR ACTIVITIES

1. 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 Swachh 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, woman, 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 centers 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, 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 Paramilitary 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.

2. The CSR Activities shall be carried out in a manner that preference is given to undertake CSR Activities in and around the local areas where the Company operates or has business presence.





3. Based on the scope of activities set out in Clause IX (1) above, the CSR Committee shall provide recommendations to the Board with respect to specific CSR Activities that may be undertaken or executed by the Company.
4. 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. For this purpose, the CSR Committee may also approach external consultants for necessary assistance as it may deem fit at such costs as may be approved by the Board.
5. The following details of any CSR Activities to be undertaken by the Company shall be presented to the Board by the CSR Committee along with its recommendations:
 - (i) The list of CSR projects or programmes to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - (ii) The objectives and expected results of the CSR Activity;
 - (iii) The relevant sector and the nature of the CSR Activity;
 - (iv) The focus area/ location for implementation of the CSR Activity;
 - (v) The modalities of utilisation of funds and amount to be allocated towards the CSR Activity;
 - (vi) The implementation schedules for the projects or programmes with indicative timelines for completion of the CSR Activity;
 - (vii) The manner of execution - whether the CSR Activity should be undertaken by any Implementing Agency or in collaboration with any other Company;
 - (viii) Monitoring and reporting mechanism;
 - (ix) details of need and impact assessment, if any, for the projects undertaken by the Company; and
 - (x) Such other details as it may deem necessary.
6. 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.
7. Based on the recommendations of the CSR Committee, the Board shall approve the CSR activities of the Company for a given financial year.

X. TRANSFER OF UNSPENT CSR FUNDS

1. In the case of on-going projects, the unspent CSR amount needs to be transferred to a new account to be opened by the Company Unspent CSR Account within 30 days of end of financial year. Such amount needs to be utilized within three financial years following the financial year in which such on-going project has commenced.
2. If there are no on-going projects, the unspent CSR funds need to be transferred to any of the specified funds specified under Schedule VII to the Act within 6 months of the end of the financial year.





XI. EXCESS CSR SPENDING

Excess CSR Spending set-off can be claimed up to immediately succeeding three financial years provided a resolution to that effect is passed by the Board and the excess amount shall not include surplus arising out of CSR activities.

XII. REPORTING AND RECORD KEEPING

1. The CSR Committee shall maintain proper minutes of all its meetings.
2. The Board's report of the Company shall include an annual report on CSR containing the particulars and such other details as may be prescribed from time to time under the Act and the CSR Rules.
3. In respect of the reporting, the Board will be responsible to ensure that:
 - (i) The report of the Board includes the annual report on CSR Activities of the Company and sets out the requisite information in terms of the Act and the Rules;
 - (ii) The contents of the latest and updated version of the CSR Policy are included in the report of the Board;
 - (iii) The contents of the CSR Policy along with composition of the CSR committee, and projects approved by the Board are also made available on the website (if any) of the Company.
 - (iv) In case of failure to ensure the minimum CSR Expenditure, detailed reasons for the same are adequately disclosed in the Board Report and ensure that the unspent amount is transferred as per the provisions of sections 135(5) and 135(6) of the Act.
4. Payments should be accurately recorded in the Company's books and records. They must be substantiated by proper documentation including written receipts to ensure that any tax relief (or other such deductions as may be applicable) can be obtained by the Company.

XIII. AMENDMENT

The Board of the Company may, subject to compliance with applicable laws, 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 under the Act.

XIV. POLICY DISSEMINATION

The CSR policy is forming part of the Board's report under the Act and is also being uploaded on the website of the Company <https://www.adama.com/india>. The disclosure requirements on the website of the Company are following: -





As per rule 9, the Board of Directors of the Company shall mandatorily disclose the following on their website, if any, for public access:

- ✓ Composition of the CSR Committee;
- ✓ CSR Policy; and
- ✓ Projects approved by the Board.

XV. MANAGEMENT COMMITMENT

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. All employees are expected to conduct/handle/oversee CSR activities in a legal and ethical manner and follow the requirements outlined in this Policy.

It is the responsibility of management to implement this Policy within their functions and provide guidance to the employees who report to them. Management must not tolerate or approve any charitable contributions/CSR activities that are inconsistent with this Policy, the Code of Conduct, the Anti-Bribery Policy or other Policies.

The Company prohibits any improper, false, artificial or misleading records that disguise or misrepresent in any way non-commercial sponsorships and/or philanthropic donations or their true purpose.

If you have a question or need guidance in general, please get in touch with People Department's Head, Corporate communication manager and for any legal guidance, General manager of Legal department.

Also raise your concern with them, if you suspect that there may be a violation of this Policy. All reports are taken seriously and will be appropriately investigated. All necessary corrective actions are implemented. The Company does not tolerate retaliation against any individual submitting a report in good faith.

We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

Certified by

Sahin Ozkan

*CSR Committee Member & Managing Director
(DIN: 09660763)*

