

CORPORATE SOCIAL RESPONSIBILITY POLICY

VISION

To actively contribute towards Inclusive Sustainable Socio-Economic Development of the Community and to create societal capital while creating long term value for other stakeholders.

PHILOSOPHY

Long before the advent of CSR on the Indian Corporate scene, The Waterbase Limited (“TWL”) has been contributing immensely for the cause of Education, Sports, Cancer & Eye Care Research, Rehabilitation of Earthquake/Flood/Other natural disaster victims and Medicare in India, with an aim to benefit the disadvantaged/underprivileged sections of society.

TWL, since its inception has cultivated a value system that business enterprises are economic organs of society and thrive on societal resources, hence it is the moral obligation and duty of an enterprise to reward the society. Therefore, at TWL, we endeavor to follow the system of Triple Bottom Line accountability to measure the company’s performance and its impact on inclusive and equitable growth of the marginalized sections of society.

As a responsible business, TWL takes pride in being socially inclined and focuses on sustained and effective CSR Projects. The CSR policy aligns with the corporate philosophy of living and working together for common good. Our employees are encouraged to volunteer their time and skills and enjoy the experience of giving back to the communities in which they work.

INTERPRETATIONS:

- (a) “Act” means The Companies Act, 2013 as amended from time-to-time.
- (b) “Board” means Board of Directors of the Company.
- (c) “Rules” means The Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time-to-time
- (d) “Committee” means the CSR Committee of the Board

POLICY:

1. TWL is committed to the following: -
 - i. To synergize the long-term value creation for the shareholders with creation of societal capital for seamless integration of the enterprise with the society at large
 - ii. To integrate CSR programmes with the Company’s business and endeavor to implement the Social Investments/CSR programmes in the vicinity of the Company’s operations
 - iii. To integrates economic progress, social responsibility and environmental concerns (Triple Bottom Line accountability) with the objective of improving quality of life
 - iv. To ensure inclusive and sustainable socio-economic development of the

underprivileged/needy/deserving communities through the means of primary and higher education, eradication of poverty, elimination of hunger, supporting research & development work in the field of cancer, eye care, building of medical-care capacity, rural development projects and such other initiatives

- v. To support and promote the cause of all kind of sports and physical health education
- vi. To promote the cause of environmental sustainability, ecological balance, protection of flora & fauna, animal welfare, agroforestry, conservation of forest & natural resources, maintaining quality of soil, air and water
- vii. To promote gender equality, empowering of women economically and such other initiatives
- viii. To encourage the development of human capital through skills development, vocational training etc. and contribute to the happiness index of the community by promoting livelihood enhancement projects
- ix. To contribute for the promotion and accomplishment of the above stated causes through collaborative partnership with the Government, the District Authorities, the village panchayats, NGOs etc. including contributions to Prime Minister Relief Fund or any other fund setup by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, Scheduled Tribes, other backward classes, minorities and women

The company may also collaborate with other companies, including Group Companies, Subsidiaries, Associates, affiliates etc. for undertaking CSR Projects/ programs. However, the same should be undertaken in such a manner that the CSR Committees of respective companies are in a position to report separately on such projects or programs.

The surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.

2. Focus Areas: -

- 2.1. Education
- 2.2. Health care and family welfare
- 2.3. Sports & Culture
- 2.4. Social causes
- 2.5. Infrastructure development
- 2.6. Sustainable livelihood
- 2.7. Environment
- 2.8. Women Empowerment

3. However, all other areas as may be notified by the Central Government from time to time and as included in Schedule VII to the Act may also be taken up. Further, preference shall be given to local area and areas around it where it operates, for spending the amount earmarked for CSR activities.

4. Further, the CSR amount may be spent by the Company for creation or acquisition of a capital asset, which shall be held by –

(a) a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number under sub-rule (2) of Rule 4; or

(b) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or

(c) a public authority:

5. Partners: - Trusts, NGO, Govt. Agencies, other agencies /entities/beneficiaries as allowed by the Government.

CSR COMMITTEE

CSR Committee shall consist of at least 3 (three) Directors, out of which at least one Director shall be an Independent Director.

MEETING OF COMMITTEE

1. The Committee shall meet at least once in a year, preferably at the beginning of the financial year, to formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely:
 - a) the list of CSR projects or programmes that are approved to be undertaken in areas or subject specified in Schedule VII of the Act;
 - b) the manner of execution of such projects or programmes;
 - c) the modalities of utilization of funds and implementation schedules for the projects or programmes;
 - d) monitoring and reporting mechanism for the projects or programmes; and
 - e) details of need and impact assessment, if any, for the projects undertaken by the Company.
2. However, the Board of Directors of the Company may alter such plan at any time during the financial year, as per the recommendations of the CSR Committee, based on the reasonable justification to that effect.
3. Apart from the above, the Committee shall hold meetings as and when necessary.

MONITORING OF CSR PROGRAMS

1. Notwithstanding whatever mentioned elsewhere, every year, the CSR Committee will place for the Board's approval, a CSR Plan delineating the CSR Programmes to be carried out during the financial year and the specified budgets thereof. The Board will consider and approve the CSR Plan with any modification that may be deemed necessary.
2. The Board / Committee shall be responsible for day-to-day management of CSR related activities of the company. The Board / Committee shall periodically review regarding the financial and programmatic progress of CSR projects. All projects undertaken by the Company shall be monitored on a regular basis.
3. The Board / Committee shall be empowered to appoint an external third party to monitor / review / audit the progress (financial and programmatic) of any CSR projects, if required.
4. The Committee will appoint an independent agency / firm of repute for carrying out impact assessment, if applicable, and the report of such impact assessment shall be placed before the Board and shall also be annexed with the Annual Report on CSR.

AMENDMENTS TO THE CSR POLICY

CSR Policy may be updated to align it with the changing requirement or changes in the legal and regulatory framework. Any revision in the Policy shall be approved by the Board of Directors on the recommendation of the CSR Committee.

For and on behalf of the Board / CSR Committee

Sd/-

Chairman
Board of Directors

Sd/-

Chairman
CSR Committee

THE POLICY WAS LAST AMENDED BY THE BOARD OF DIRECTORS OF THE COMPANY VIDE ITS MEETING HELD ON MAY 27, 2021

VERSION HISTORY:

<i>Version</i>	<i>Effective Date</i>
<i>Version # 1.0</i>	<i>April 2014</i>
<i>Version # 2.0</i>	<i>May 2021</i>