



Corporate Social Responsibility Policy
of
Oriental Rail Infrastructure Limited
(Formerly Oriental Veneer Products Limited)

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CORPORATE SOCIAL RESPONSIBILITY POLICY OF ORIENTAL RAIL INFRASTRUCTURE LIMITED (FORMERLY ORIENTAL VENEER PRODUCTS LIMITED)

1. Short Title & Applicability:

The Corporate Social Responsibility policy of the Oriental Rail Infrastructure Limited ('Oriental') encompasses its philosophy as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large.

This policy shall apply to all CSR initiatives and activities taken up by the company for the benefit of different segments of the society.

2. Interpretation

For the purposes of this Policy references to the following shall be construed as:

1. **“Act”** means Companies Act, 2013;
2. **“CSR entities”** means an entity, other than the Company, eligible to undertake CSR activity under the Act and/ or the Rules (defined hereinafter) that may be engaged by the Company for the purpose of undertaking CSR activities from time to time.
3. **“Group”** means the Oriental Group and includes the Company, its Subsidiaries and Associates;
4. **“Rules”** means The Companies (Corporate Social Responsibility Policy) Rules, 2014
5. **“Ongoing Projects”** the Company has defined “Ongoing projects” as those projects approved by the Board as multi- year projects with a timeline not exceeding 3 years excluding the year of commencement (based on reasonable justification to the Board for those projects whose duration has been extended beyond one year)

3. Corporate Social Responsibility (CSR) Committee composition

The Board has established a Committee of the Board as the CSR Committee. The Committee currently comprises three directors of the Board and its composition more than adequately meets the requirements of the Act.

4. Scope of Oriental's CSR Policy

Oriental's CSR Policy, Projects and programmes are within the scope of CSR mandate as specified under Sections 134, section 135 read with schedule VII of the Companies Act, 2013 along with Companies



(Corporate Social Responsibility Policy) Rules, 2014 (“CSR Rules, 2014”), as amended from time to time and in line with the Government of India’s notifications issued from time to time. Oriental also endeavours to align its CSR projects and programmes with Government initiated social development programmes, interventions, and the UN’s Sustainable Development Goals (SDGs).

Oriental will be guided by these permissible activities viz;

- i. 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.
- ii. promoting education, including special education and employment enhancing vocation skills especially among children, women, 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, 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].
- 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 art and handicrafts.
- vi. 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].
- 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 govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women.
- viii. (a)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
(b) 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 Organization (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).
- ix. rural development projects
 - x. 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.
 - xi. disaster management, including relief, rehabilitation and reconstruction activities.

5. Key Focus Areas

At the heart of Oriental's CSR endeavours, the following initiatives are focused upon in order to bring about a sustained, positive impact:

Sr. No.	Thematic Area	Details	Schedule VII
1.	Healthcare	<ul style="list-style-type: none"> a) enable government, municipal hospitals and private hospitals in delivering quality healthcare by providing them upgraded medical equipment, Oxygen supports, ambulance and other infrastructure support; b) healthcare initiatives for the elderly, abandoned citizens to improve quality of life. c) Bearing Medical and Hospital expenses for Poor citizen; 	Item (i)
2.	Poverty	<ul style="list-style-type: none"> a) Providing financial assistance/Food facility to elderly and Poor citizen for Eradicating hunger, poverty and malnutrition b) making available safe drinking water 	Item (i)
3.	Education	<ul style="list-style-type: none"> a) financial support to girls and women from weaker economic backgrounds to support them complete formal education and join formal workforce, enabling employment and self-reliance. b) Bearing school fees and Tuition fees expenses for economically weaker section students. c) Directly giving donations to school, Colleges, Institute to teach economically backward students. 	Item (ii)
4.	Disabilities	<ul style="list-style-type: none"> a) promoting gender equality, empowering women, b) setting up homes and hostels for women and 	Item (iii)



		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	
5.	Environment	a) support organisations in Research & Development of sustainable products to build solutions for environmental challenges; b) measures to reduce carbon footprint including afforestation c) ensuring environmental sustainability, ecological balance, protection of flora and fauna	Item (iv) Item (ix) (b)
6.	Livelihoods	a) support livelihood initiatives to promote and build sustainable, alternate income sources for women, small holder farmers engaged in agriculture and allied initiatives by building their knowledge and awareness on best practices and upgrading their technical skills; b) support to war widows and dependents of martyred defence personnel; c) support towards sports	Item (vi)

The Company may change the aforementioned themes basis the evolving environment and needs, in alignment with Schedule VII, Section 135 of the Act.

6. Target Group & Geographic Coverage

To meet its CSR mission, the Company has defined target group and geographical spread where most of the Company's efforts will be focused:

- i. **Target Group:** people at the bottom of the socio-economic pyramid/underserved communities especially girls, women, intellectually and physically challenged children and youth, senior citizens and citizens with diagnostic and preventive healthcare needs.
- ii. **Geographic Coverage:** Oriental will endeavour to implement its projects and programmes in and around the geographies where it carries its business and operations, Oriental may also implement CSR programmes and/or projects in any geography but within India to serve and support the needy people and/or towards nation building. The Company has a geography agnostic and need based approach. However, all CSR activities are to be undertaken within the geographical boundary of the country



7. Prohibited Activities under CSR

The Company will abstain from carrying out the following activities under CSR that may create dissatisfaction in any section of the Society:

- a. Activities concerned with religion like construction of temple/mosque etc.;
- b. Activities disturbing social harmony in any manner;
- c. Activities exclusively for the benefit of employees of the company or their family members;
- d. Contribution of any amount directly or indirectly to any political party as given under Section 182 of the Companies Act, 2013 shall not be considered as CSR activity;
- e. Such other activities as may be prohibited by Central Government’;

Further, the CSR activities of the Company will not include the activities undertaken in pursuance of normal course of business of the Company. Any contribution directly or indirectly to any political party or any religious groups will not be considered as CSR activity.

8. Budget Allocation

In accordance with Section 135 of the Companies Act, 2013, the total amount to be spent for CSR projects undertaken by the Company will be calculated on the basis of 2% of the average net profits of the three immediately preceding financial years. The net profit shall be calculated in accordance with the provisions of Section 198 of the Companies Act.

On the recommendations of CSR Committee, the Board shall ensure that in every financial year, Oriental spends at least two (2) % of its average net profits made during the three (3) immediately preceding financial years in pursuance to the provisions of this CSR Policy and in accordance with Section 135 read with schedule VII of the Act and CSR Rules, 2014 as amended from time to time.

9. Treatment of Amounts: Excess, Unspent & Surplus

The Company shall categorise and treat an amount in CSR in the following manner:

- a. **Excess Amount:** Oriental can choose to utilize any excess amount spent in CSR by setting off the amount against the requirement to spend under section 135, in succeeding 3 financial years.
- b. **Unspent Amount:** In the event that any CSR funds remain unspent, the Board in its report made under Section 134(3)(o) of the Act, shall specify the reasons for not spending the said amount. However, if such unspent CSR funds do not relate to any Ongoing Projects, as mentioned above, such unspent funds shall be transferred to any fund specified under Schedule VII of the Act, within a period of Six (6) months of the expiry of the financial year.

In the event that any CSR funds remain unspent pursuant to an Ongoing Project, Oriental shall transfer



such unspent CSR funds in any scheduled bank in account named as “Unspent Corporate Social Responsibility Account (UCSR A/C) within 30 (thirty) days from the end of the Financial Year. Such unspent CSR funds shall then be spent in accordance with the terms of the CSR Policy within a period of three (3) Financial Years from the date of such transfer, failing which, Oriental shall transfer the same to a Fund specified in Schedule VII of the Act, within a period of thirty (30) days from the date of completion of the third financial year.

10. Capital Asset: Creation or Acquisition

CSR amount may be spent by the Company for creation or acquisition of a Capital Asset, which shall however, be held by either:

- a. company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects;
- b. beneficiaries of the CSR Project, in the form of self-help groups, collectives, entities;
- c. government/ municipal hospitals and schools; and a public authority.

11. Administrative Overheads

Administrative Overheads means the expenses incurred by the Company for general management and administration of Corporate Social Responsibility functions in the Company such as employee cost, utility, office supply, legal expenses etc.

As per the provisions of CSR Rules the Board shall ensure that the administrative overheads shall not exceed 5% of total CSR expenditure for the financial year.

12. Guiding principles for implementation of CSR Activities

Oriental will either directly implement its CSR projects and programmes, and/or collaborate with eligible organizations meeting the minimum criteria as set out in subsequent paragraphs:

i. Direct, Self-execution CSR projects:

CSR Projects undertaken, executed and implemented by itself (Oriental) under its direct CSR projects may include engagement and involvement of all stakeholders including employees, across Indian geography. For the purpose of implementation and monitoring, Oriental may engage a third party organization /consultant etc. however, the onus and responsibility on implementing and monitoring rests with Oriental.

ii. CSR projects with Implementing Partner Organizations:

CSR Project with Implementing Partner in the CSR context denotes: Oriental partnering/collaborating with Non- Government Organization (NGO) or Not for Profit Organization (NPO) to implement CSR projects



where the CSR projects are fully or partially funded by Oriental's CSR budget (i.e.; Oriental is the funding partner) and project implementation carried out by the partner organization (through a partner organization like NGOs, NPOs).

iii. Execution of approved Projects:

Oriental shall ensure that the CSR activities are undertaken by itself or through any of the following entities registered with the Central / State / Local Government under the CSR Rules:

- a. A Company established under section 8 of the Act, or a registered public Trust or a registered Society, registered under section 12A and 80G of the Income Tax Act 1961 and having an established track record of at least three (3) years in undertaking similar activities
- b. A Company established under Section 8 of the Act or a registered Trust or a registered society established by the central Government or state Government or
- c. Any entity established under an Act of the Parliament or a State Legislature.

iv. Engagement of International Organizations:

Oriental may engage International Organizations for designing, monitoring and evaluation of the CSR projects or programmes as well as for capacity building of its personnel for CSR.

13. Disclosures

A. CSR Reporting:

The Board's report pertaining to any Financial Year must contain details of the CSR initiatives taken during such Financial Year in the form and manner prescribed under Section 135 read with Schedule VII of the Act read along with the CSR Rules, 2014 as amended from time to time and in line with the Government of India's notifications issued from time to time.

B. Dissemination of CSR related information:

The following information shall be made available on the Company's website:

- i. Oriental CSR Policy, details on executing partners and all other information as required to be complied in the Annual Report as prescribed by Section 135 for information of all stakeholders; and
- ii. expenditure entailed in various CSR projects, undertaken on a regular basis will be available in the public domain;



14. Amendments

Amendments to the CSR Policy, if any, shall be considered by the Board of the Company, based on the recommendations of the CSR Committee. This Policy has been made as per the provisions of the Act and the Rules made thereunder ('Applicable law'). Any amendments in the Applicable Law, including any clarifications/ circulars of relevant regulator, if mandatory, shall be read with this Policy such that the Policy shall automatically reflect the contemporaneous Applicable Law at the time of its implementation.

This CSR Policy Statement is effective from December 14, 2021, and supersedes all earlier Oriental CSR Policy statement.