EPL LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY [1]

[1] Amended as on November 8, 2023

CORPORATE SOCIAL RESPONSIBILITY POLICY ("CSR POLICY")

PREAMBLE

In line with the provisions of Section 135 of the Companies Act, 2013 (as amended) ("Act") and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended) ("Rules"), the Board of Directors ("Board") of EPL Limited ("Company" or "EPL"), upon the recommendation of the Corporate Social Responsibility Committee ("Committee"), has adopted this CSR Policy with respect to the Company's Social Responsibility.

CORPORATE SOCIAL RESPONSIBILITY PHILOSOPHY

Corporate Social Responsibility ("CSR") is the Company's commitment to its stakeholders to conduct business in an economically, socially and environmentally sustainable manner that is transparent and ethical.

EPL strives to be a socially responsible Company and strongly believes in development which is beneficial for the society at large. As a Corporate Citizen receiving various benefits out of society, it is our co-extensive responsibility to pay back in return to the society in terms of helping needy people by providing sustainable development, etc., keeping the environment clean and safe for the society by adhering to the best practices and technologies, and so on. It is the Company's intent to make a positive difference to society in which the Company lives and operates.

POLICY OBJECTIVE AND SCOPE

- The objective of this Policy is to set guiding principles for carrying out CSR activities by the Company and also to set up a process of execution, implementation and monitoring of the CSR activities to be undertaken by the Company.

- This Policy applies to all CSR projects undertaken by the Company and aims to fulfill the requirements of Section 135 of the Act and the Rules.

- The Company shall ensure all these activities are carried out over and above its normal course of business and are in line with Schedule VII of the Act.

CSR COMMITTEE

The CSR governance structure will be headed by the CSR Committee of the Board of the Company.

- The members of CSR Committee shall be appointed by the Board and shall consists of at least three directors, out of which one shall be an independent director. The Board shall have the right to nominate the Chairman of the CSR Committee and decide the term of his/her office.

- The Board shall review the constitution at regular intervals and have the authority to reconstitute the CSR Committee.

- The Company Secretary of the Company shall act as the Secretary of the CSR Committee.

- At present, the CSR Committee comprises of three members out of which one is a Non-Executive Independent Director. Following are the members of CSR Committee:
  - Davinder Singh Brar – Chairman *(Non-Executive-Independent Director)*
  - Animesh Agrawal *(Non-Executive – Non Independent Director)*
  - Dhaval Jitendra Buch *(Non-Executive – Non Independent Director)*

RESPONSIBILITIES OF THE CSR COMMITTEE

The Committee shall carry out of the following functions:

(i) to formulate and recommend the CSR Policy for approval of the Board;

(ii) to formulate and recommend the Annual Action Plan to the Board in pursuance of CSR Activities to be undertaken along with detailed plan, projects/activities to be undertaken, modalities of execution, implementation schedule, monitoring process and amount to be incurred on such activities;

(iii) to monitor the CSR Policy and its compliance from time to time;

(iv) to place before the Board, annual report in the prescribed format on all CSR activities undertaken during the financial year;

(v) to display the CSR Policy on the Company's website;

(vi) such other functions as may be delegated by the Board from time to time.

CSR ACTIVITIES

The Company shall undertake any of the Activities/ Projects as specified in Schedule VII of the Act (as amended from time to time), *inter alia* the following ("CSR 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, 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 centres 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 recognised 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;

(ix) (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 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 i.e. development of any area declared as ‘slum’ by the Central Government or any State Government or any other competent authority under any law for the time being in force;

(xii) disaster management, including relief, rehabilitation and reconstruction activities; and

(xiii) Providing seed capital including creating of any corpus fund to help tide over any temporary funding gap. Such corpus fund could be deployed with or without interest depending upon the identified need, to help self-help groups to further the cause sustainable livelihood for the economically weaker sections of society;

(xiv) such other activities as may be included in the Schedule VII of the Act (as amended), from time to time.

The CSR Activities shall be undertaken for the benefit of the public and not only for the employees of the Company and their family. Provided that the preference shall be given to the local areas and areas where the Company operates for undertaking the CSR Activities.

CSR BUDGET

- The Company, in every financial year, shall endeavor to spend the feasible amount, which shall not be restricted by the statutory limit of a specified percentage of its average net profits immediately preceding three financial years. However, the aforementioned expenditure in any financial year shall be at least 2% of Company's average net profits for the three immediately preceding financial years.

- Any surplus arising out of CSR Activities shall not form part of the business profit of the Company and same shall be spent for undertaking any CSR activities only.

MODE OF IMPLEMENTATION OF CSR ACTIVITIES:

- The Company may undertake CSR Activities directly by itself or through the implementing agencies or trusts or NGOs as prescribed under the Act and the Rules.

- The Company may also collaborate with other companies for undertaking CSR Activities subject to fulfillment of separate reporting requirements as prescribed in the Rules. The Company may engage international organisations for designing, monitoring and evaluation of the CSR Activities as per its CSR policy as well as for capacity building under the Act and the Rules.

- The Board shall be responsible to ensure that the funds are utilized in the manner and for the purpose as approved and the Chief Financial Officer or the person responsible for financial management shall certify the same.

ANNUAL ACTION PLAN

- The CSR Committee shall recommend to the Board, an annual action plan which shall include the following:
  - the list of CSR projects or programmes that are approved and to be undertaken by the Company for the financial year;
  - the manner of execution of such projects or programmes;

- the modalities of utilization of funds and implementation schedules for the projects or programmes;
- monitoring and reporting mechanism for the projects or programmes; and
- details of need and impact assessment, if any, for the projects undertaken by the company.

- The Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

MONITORING

The CSR Committee will be responsible for monitoring approved projects and fund disbursals for such projects by putting in place a transparent monitoring mechanism for ensuring effective implementation of the projects, programs and activities proposed to be undertaken.

INFORMATION ON WEBSITE

The Composition of CSR Committee, Annual Action Plan approved by the Board and CSR Policy shall be disclosed on the website of the Company.

REVIEW MECHANISM

- Any or all provisions of the CSR Policy would be subject to revision/ amendment by the Board of Directors of the Company based on the recommendations of the CSR Committee or in accordance with the guidelines on the subject as may be issued, from time to time.

- Words and expressions used and not defined in CSR Policy shall have the same meaning as assigned to them in the Act and the Rules.

- In case of any inconsistency between the CSR Policy and the provisions of the Act and the Rules, the provisions of the Act and the Rules shall prevail.