

CORPORATE SOCIAL RESPONSIBILITY POLICY OF LUCENT INDUSTRIES LIMITED

The revised policy is adopted by the Board of Directors in their meeting held on March 19, 2025.

1. PREAMBLE

The Company shall carry out the CSR activities in accordance with the provisions set out under Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014, which require that at least 2% of the average net profits of the Company made during the three immediately preceding Financial Years shall be spent in pursuance of the Company's CSR Policy. The operating mechanism to carry out the CSR activities shall be as follows:

1. Taking up the activities as detailed in its focus area directly; or through
2. Any other company, trust, society, or any other entity as may be permitted by the applicable provisions.

Provided that the Company shall specify the project or programs to be undertaken through this entity, the modalities of utilization of funds on such projects and programs and the due diligence, monitoring and reporting mechanism.

2. OBJECTIVE

The objective of framing this CSR Policy is to ensure that the Company operates its business in an economically, socially & environmentally sustainable manner by enhancing the quality of life & economic well-being of society in fulfillment of its role as a socially responsible corporate.

3. SCOPE

This document outlines the Policy of General Mills India Private Limited (hereinafter referred to as 'General Mills' or 'the Company') towards Corporate Social Responsibility, in accordance with section 135 of the Companies Act 2013 read with Companies (Corporate Social Responsibility) Rules, 2014 including all statutory modifications / amendments made thereof.

4. APPLICABILITY

The Policy shall apply to all CSR projects / programmes / activities undertaken by the Company in accordance with the clauses contained herein and section 135 of the Companies Act 2013 read with Companies (Corporate Social Responsibility) Rules, 2014 including all statutory modifications / amendments made thereof.

5. DEFINITIONS & INTERPRETATION

The terms defined in this CSR Policy shall have the meanings herein specified and terms not defined shall have the meanings as defined in the Companies Act, 2013 and Companies (Corporate Social Responsibility) Rules, 2014 including any statutory modifications or re-enactments thereof.

"Act" means the Companies Act, 2013 including any statutory modification or re-enactment thereof.

"Associate Company" means a Company within the meaning of section 2(6) of the Act.

“Subsidiary Company” means a Company within the meaning of section 2(87) of the Act.

“Administrative overheads” means 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.”

“Board” means the Board of Directors of the Company.

“CSR Committee” means the Committee of the Board constituted for the purpose of administration & implementation of CSR activities, supervising the adherence of this

“CSR Policy and the matter incidental thereto referred to in section 135 of the Act. “CSR Policy” means the Corporate Social Responsibility Policy as set out herein and as amended or modified from time to time.

“CSR Rules” means Companies (Corporate Social Responsibility) Rules, 2014 including any statutory modification or amendment thereof.

“Holding Company” means a Company within the meaning of section 2(46) of the Act.

“Ongoing Project” means a multi-year project undertaken by a Company in fulfilment 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;

6. COVENANTS

- i. The CSR projects or programs or activities undertaken in India only shall amount to CSR expenditure.
- ii. The "Social responsibility" projects or programs or activities that benefit only the employees of the Company and their families shall not be considered as CSR activities except as those allowed by Government amendments from time to time.
- iii. Salaries / Remuneration paid to CSR staff as well as volunteers can be factored into CSR expenditure made by the Company as a part of the Administrative overheads. “Administrative overheads” shall 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. The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year as per rule 7(1) of the CSR Policy Rules, 2014.
- iv. Contribution of any amount directly or indirectly to any political party, shall not be considered as a CSR activity.
- v. The surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.

7. COMPANY'S FOCUS AREAS/ACTIVITIES

(a) Education:

- i. To undertake, organize and affiliate at different places for undertaking community Education: To undertake, organize and affiliate at different places for undertaking community development services such as adult literacy, computer literacy programmer's vocational training and creation of livelihood opportunities, watershed and sanitation.
- ii. To establish, maintain and run school and render other kinds of financial or other assistance in kind by way of distribution of books, notebooks, cloths, uniforms, meals stipend, medals and other incentives for the poor and indigent students either in India or abroad without any distinction as to caste colour, race, creed or sex or for providing funds for pursuing studies by any deserving student.
- iii. To provide support to recognized School(s)/ Educational Institutions which may include inter-alia modernization of labs, improving infrastructure, replacement of furniture & fixture, renovation of classrooms & toilets etc. and providing clean & safe drinking water by installing RO Systems.
- iv. To establish, run, support and grant aid or other financial assistance to schools, colleges, libraries, reading rooms, universities, laboratories, research and other institutions of the like nature in India for use of the students and the staff and also for the development and advancement of education and diffusion of knowledge amongst the women, elderly and the differently abled.
- v. To create centres of excellences for research and development in the field of technical, vocational and higher education for helping the cause of techno- economic and socio-economic planning and management and/or provide contribution or funds to technology incubators located within academic institutions which have been approved by the Central Government.

(b) Healthcare

- i. To establish dispensary, hospital for providing for quality healthcare services including emergency healthcare services.
- ii. To purchase ambulance/s and other health equipment's for expanding health care activities and open healthcare centres for the public at large at different places for the welfare of the society as a whole.
- iii. To support various medical initiatives aimed at reducing mortality rate of children.
- iv. To conduct regular health check-ups for children in schools of neighbouring regions.
- v. To undertake other initiatives for eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.

(c) Environment

- i. Support a precautionary approach to environmental challenges and work under framework/policies such as IT E-Waste Policy.

- ii. Undertake initiative to promote greater environmental responsibility.
- iii. Tree plantation at and all across the plant and in front of the factory area in approved public land to create forest / green belt.
- iv. To create awareness of cleaner, greener environment and global warming issues at schools and also at villages from the surrounding region.
- v. Other initiatives for 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.

(d) Community Service

- i. 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 citizen and measures for reducing inequalities faced by socially and economically backward groups.
- ii. Measures for the benefit of armed forces veterans, war widows and their dependents.

(e) Promotion of sports

- i. To promote rural sports, nationally recognized sports, paralympic sports and Olympic sports.

(f) Other initiatives

- i. 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.
- ii. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.
- iii. Rural development projects.
- iv. Any other activity (ies) / requirement arising from time to time & covered under the Schedule VII of the Companies Act, 2013 or as may be provided by the rules in this regard.

8. DUE DILIGENCE MECHANISM

The Company personnel entrusted with the responsibility for CSR activities of the Company shall identify projects or programs to be undertaken, conduct due diligence, monitor impact and present before the CSR Committee an annual action plan for recommendation to Board for further approval.

9. REVIEW MECHANISM

(a) CSR Committee

- i. To approve the recommend activities and the amount of expenditure to be incurred.
- ii. To report on utilization of funds to the Board of Directors.
- iii. To review the CSR policy periodically, as and when it may be required.

(b) Board of Directors

- i. To ensure proper compliance of the Policy.
- ii. To review the CSR initiatives and utilization of funds towards the same.

10. DISCLOSURE

The CSR policy of the Company shall be displayed on the Company's website.

11. AMENDMENTS

The CSR Committee shall monitor the Corporate Social Responsibility Policy of the Company from time to time.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc
