Cholamandalam MS Risk Services Limited

Corporate Social Responsibility Policy

March 2026

Table of Contents

Sr. No.	Particulars	Page No.
1	Preamble	3
2	Definitions	3
3	Corporate Social Responsibilities Purpose Statement	3
4	Scope	4
5	Governance	4
6	Annual Action Plan	5
7	CSR Spend	5
8	Implementation	6
9	CSR Programs/Projects	7
10	Monitoring and Reporting	7
11	Disclosure	8
12	Annual Review	8

1. Preamble

The Murugappa Group, to which the Cholamandalam MS Risk Services Limited is a constituent is known for its tradition of philanthropy and community service. The Group's philosophy is to reach out to the community by establishing service-oriented philanthropic institutions in the field of education and healthcare as the core focus areas.

Cholamandalam MS Risk Services Limited has been upholding the Group's tradition by earmarking a part of its income for carrying out its social responsibilities. We believe that social responsibility is not just a corporate obligation that has to be carried out but it is one's *dharma*. Therefore, our philanthropic endeavours are a reflection of our spiritual conscience and this provides us a way to discharge our responsibilities to the various sections of society.

2. Definitions

2.1	"Act"	Act shall mean The Companies Act, 2013.
2.2	"Board"	Board shall mean the Board of Directors of Cholamandalam MS Risk Services Limited
2.3	"Company"	Company shall mean Cholamandalam MS Risk Services Limited.
2.4	"CSR Policy"	CSR Policy shall mean the Corporate Social Responsibility Policy of the Company
2.5	"Net Profit"	Net Profit shall mean the profit/loss before tax as per its financial statements prepared in accordance with the applicable law.
2.6	"Rules"	Rules shall mean the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

3. Corporate Social Responsibility Purpose Statement

The Company shall seek to positively impact the lives of the disadvantaged by supporting and engaging in activities that aim to improve their wellbeing. We are dedicated to the cause of empowering people, educating them and in improving their quality of life. While we will undertake programme based on the identified needs of the community, education and healthcare shall remain our priority. Across the different programme areas identified by the Company, it would be our endeavour to reach the disadvantaged and the marginalised sections of the society to make a meaningful impact on their lives.

We are committed to identifying and supporting programs aimed at:

3.1 Empowerment of the disadvantaged sections of the society through education, access to and awareness about financial services and the like and Provision of Skill Development/ Vocational Training;

3.2 Provision of access to basic necessities like healthcare, drinking water & sanitation and the like to underprivileged including girls in schools/ colleges;

3.3 Work towards eradicating hunger and poverty, through livelihood generation and skill development;

3.4 Supporting environmental and ecological balance through afforestation, soil conservation, rain water harvesting, conservation of flora & fauna, and similar programme including animal welfare related support;

3.5 Promotion of sports through training of sportspersons;

3.6 Promotion of arts and culture;

3.7 Undertake rural development projects;

3.8 Providing support to institutions involved in welfare of senior citizens;

3.9 Providing support for initiatives aimed at improvements in Road Safety and supporting rehabilitation programmes for accident victims;

3.10 Disaster relief and management;

3.11 Women empowerment.

3.12 Any other programme that falls under CSR Policy or Schedule VII of the Companies Act, 2013 and which are aimed at the empowerment of disadvantaged sections of the society.

4. Scope

This policy shall apply to all projects/programs undertaken as part of the Corporate Social Responsibility of the Company and shall be developed, reviewed and updated periodically with reference to relevant changes in corporate governance, international standards and sustainable and innovative practices. The policy shall maintain, at all times, compliance with Section 135 of the Act and the rules framed thereunder. The CSR activities shall be aligned to the activities listed in Schedule VII of the Act.

5. Governance

5.1 The Board of the Company shall be responsible for:

5.1.1 Ensuring that the CSR activities are in conformity with the activities mentioned in Schedule VII of the Act.

5.1.2 Approving the CSR Policy.

5.1.3 Ensuring that funds committed by the Company for CSR activities are effectively utilized and monitored.

5.1.4 In case of an ongoing project (multi-year project not exceeding three years excluding the financial year in which it was started), the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

5.1.5 Formulating the CSR activities or Annual Action Plan in compliance with Section 135 of the Act, for approval of the Board.

5.1.6 Approving CSR programs and the amount of expenditure to be incurred on the CSR activities.

5.1.7 Instituting a transparent monitoring mechanism for implementation of the CSR activities and expenditure of funds.

5.1.8 To carry out aforesaid activities the Board is authorized to take professional support from individuals or organizations having expertise in related fields.

5.1.9 The Board shall provide guidelines for projects/partner selection to the respective HR or CSR teams, wherever applicable.

As the CSR activities of the Company evolve, the policy may be revised by the Board of the Company.

6. Annual Action Plan

The Board shall formulate, an annual action plan in pursuance of this policy, which shall include the following, namely:

6.1 the list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act or as may be permitted;

6.2 the manner of execution of such CSR projects or programs;

6.3 the modalities of utilization of funds and implementation schedules for the projects or programs;

6.4 monitoring and reporting mechanism for the projects or programs; and

6.5 details of need and impact assessment, if any, for the projects undertaken by the Company:

The Board may alter the action plan at any time during the financial year, based on a reasonable justification to that effect.

7. CSR Spend

7.1 In line with Section 135(5) of the Act, the Board of the Company shall ensure that the Company spends not less than 2% of the three years' average Net Profits on the CSR activities.

7.2 The Board shall state the amount of expenditure to be incurred on the CSR activities to be undertaken by the Company as specified in Schedule VII of the Act as amended from time to time.

7.3 The amount spent on CSR activities in excess of mandatory requirement, may be set off against the requirement to spend towards CSR under the Act up to immediate succeeding three financial years subject to the conditions prescribed in the Act and the Rules made thereunder.

7.4 The unspent amount of CSR during a financial year, if any, not pertaining to any ongoing project shall be transferred by the Company to any fund specified in Schedule VII of the Act within six months from the expiry of the financial year.

7.5 The unspent amount of CSR during a financial year, if any, pertaining to any ongoing project, fulfilling such conditions as may be prescribed under the Act or the Rules made thereunder, and under the Policy, shall be transferred, within a period of 30 days from the end of the financial year to a special bank account to be opened in this behalf for that financial year in a scheduled bank to be called "Unspent CSR Account", and such amount shall be spent by the Company towards the specified CSR activities within a period of three financial years from the date of the transfer, failing which the amount remaining unspent at the end of the 3 financial years in the said account shall be transferred to a Fund specified in Schedule VII of the Act, within 30 days from the expiry of the third financial year.

7.6 In the event of any surplus arising out of CSR projects, the same shall not form part of business profits of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account. The same shall be spent in pursuance of CSR policy or transfer such surplus amount to a Fund specified in Schedule VII of the Act, within a period of six months of the expiry of the financial year.

7.7 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 a registered society, having charitable objects and CSR Registration Number as prescribed under the Act and the Rules made thereunder; or

b. Beneficiaries of the said CSR project in the form of self-help groups, collectives, entities; or

c. Public authority.

8. Implementation

8.1 The Company shall undertake CSR project/programs identified by the Board of the Company in line with the CSR Policy.

8.2 The Company shall implement its CSR programs/projects through itself or through:

8.2.1 A company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of Section 10 or registered under section 12A and approved under section 80G of the Income Tax Act, 1961, established by the Company either singly or along with any other company; or

8.2.2 A company established under section 8 of the Act or a registered public trust or a registered society, established by the Central Government or State Government; or

8.2.3 Any entity established under an act of Parliament or a State legislature; or

8.2.4 A company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of Section 10 or registered under section 12A and approved under section 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

8.3 The Company may enter into partnerships or alliances with NGOs, Trusts, or other Corporate Foundations etc. to effectively implement its CSR programs/ projects.

8.4 The Company can also implement programme in collaboration with other company(ies), if permissible and feasible and the Companies shall report separately on such projects or programmes.

8.5 The Company shall formulate criteria and procedure for selection, screening and due diligence of its implementing partners.

8.6 In case of ongoing projects, the Board shall also monitor the implementation with reference to the approved timelines and year-wise allocation. The Board is empowered to make modifications for implementation of on-going projects.

8.7 The Board shall make sure the CSR funds disbursed for ongoing projects are utilised for the purposes in the manner as it was approved by the Board and Finance - Head/Chief Financial Officer shall certify the same.

9. CSR Programs/Projects

The Company would be adopting a focused and structured approach towards implementing its CSR initiatives. It has identified thematic and program areas to guide the design, intent and approach of its CSR initiatives. These are broad thematic areas with focus on quality service delivery and empowerment.

The program areas are:

- Empowerment of the disadvantaged sections of the society through education, access to and awareness about financial services and the like and Provision of Skill Development/ Vocational Training;
- Provision of access to basic necessities like healthcare, drinking water & sanitation and the like to underprivileged including girls in schools/ colleges;
- Supporting environmental and ecological balance through afforestation, soil conservation, rain water harvesting, conservation of flora & fauna, and similar programme including animal welfare related support;
- Rural Development,
- Environmental sustainability,
- Promoting Sports, arts & culture,
- Sustainable livelihood including setting up old age homes, day care centres and such other facilities for senior citizens,
- Road safety campaigns and supporting rehabilitation programmes for accident victims,
- Disaster Relief Programs,
- Women empowerment,
- Any other programme that falls under CSR Policy and which are in alignment with the activities listed in Schedule VII and Section 135 of the Act and the CSR Rules framed thereunder.

10. Monitoring and Reporting

10.1 The Board shall oversee the implementation and monitoring of all CSR projects/ programs and periodic reports shall be provided for review to the Board.

10.2 The Company may engage External organisations including international organizations for designing, monitoring and evaluation of the CSR projects or programs, as well as for capacity building of their own personnel for CSR.

10.3 The Board shall monitor the implementation of the project on approved timelines, year-wise allocation and shall make modification if any, ensuring smooth implementation of the Project.

10.4 The Company, subject to conditions as laid down under the Act and Rules, shall undertake impact assessment for the projects through an independent agency.

10.5 The Company shall institute a well-defined, transparent monitoring and review mechanism to ensure that each CSR project/program has:

10.5.1 Clear objectives developed out of the societal needs that may be determined through need assessment studies and research (secondary or primary);

10.5.2 Clear targets, timelines and measurable indicators, wherever possible;

10.6 A progress monitoring and reporting framework that is aligned with the requirements of Section 135 of the Act and the Rules.

10.7 The Chief Financial Officer or any other person as may be authorised by the Board shall certify that the CSR funds disbursed have been utilised for the purposes and in the manner as approved by the Board.

11. Disclosures

11.1 The Board's Report of the Company shall include the annual report on CSR containing particulars as specified under the Act and Rules.

11.2 If the average CSR obligation is ten crore rupees or more in the three immediately preceding financial years, the Company shall undertake an impact assessment through an independent agency, of the projects having outlay of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study. The impact assessment report shall be placed before the Board and annexed to the Annual Report on CSR.

11.3 The CSR Policy of the Company approved by the Board shall be displayed on the Company's website.

12. Annual Review

The Board shall review the CSR Policy:

12.1 at least once in every financial year, or

12.2 as and when the Board considers it appropriate, or

12.3 as and when the underlying laws governing the CSR policy undergone any change including any relevant change in the laws mentioned in the Governing Law section of the CSR Policy.