

VEDANTA LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

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Company	Vedanta Limited
Recommended By	Corporate Social Responsibility Committee (CSR Committee)
Approved By	Board of Directors
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VEDANTA LIMITED CORPORATE SOCIAL RESPONSIBILITY POLICY

A. POLICY OBJECTIVE

Vedanta Limited ('VEDL' or 'the Company') is committed to conduct its business in a socially responsible, ethical and environment friendly manner and to continuously work towards improving quality of life of the communities in and around its operational areas and beyond in alignment with India Development Goals & UN Sustainable Development Goals. This Policy provides guidance in achieving the above objective and ensures that the Company operates on a consistent and compliant basis.

B. VEDANTA'S CSR PHILOSOPHY

We at Vedanta Limited, have a well-established history and commitment to reinvest in the social good of our neighbourhood communities and across the nation as a whole.

CSR VISION

"Empowering communities, transforming lives and facilitating nation building through sustainable and inclusive growth."

We believe that

- we positively impact and contribute to the realization of integrated and inclusive development of the Country, in partnership with National and State Government as well as local, national and international partners;
- sustainable development of our businesses is dependent on sustainable, long-lasting and mutually beneficial relationships with our stakeholders, especially the communities we work with;
- beyond government forging partnerships with corporates and civil societies/community-based institutions, offer a strong multiplier for consolidating our efforts, resources towards building sustainable solutions;
- our employees have the potential to contribute not just to our business, but also towards building strong communities.

C. THEMATIC FOCUS AREAS

Our programs focus on poverty alleviation, especially integrated development, which impacts the overall socio-economic growth and empowerment of people, in line with baseline and need assessment, the national and international development agendas.

The major thrust areas are:

- a) Children's Well-being & Education
- b) Women's Empowerment
- c) Health Care
- d) Water & Sanitation
- e) Sustainable Agriculture & Animal Welfare
- f) Market linked Skilling for the Youth through Skill Development Initiatives
- g) Environmental Protection & Restoration
- h) Sports & Culture
- i) Development of Community Infrastructure
- j) Participation in programs of national importance including but not limited to disaster mitigation, rescue, relief and rehabilitation

The CSR activities (Annexure – Key Areas for CSR Activities) are aligned to the specified activities in Schedule VII of the Companies Act, 2013. The focus areas may be modified from time to time, as per recommendations of the CSR Committee and Board of Directors of the Company.

D. GUIDING PRINCIPLES FOR PROJECTS SELECTION AND IMPLEMENTATION

The CSR projects shall be based on the recommendations of the need assessment and baseline survey report conducted every three years by an Independent Agency.

We, at Vedanta, shall consider the following implementation models for delivering its CSR programs:

- **Partnerships:** Through forming partnerships with third parties such as Section 8 Companies/Civil Society/NGOs including Multilateral & International Agencies, Academic and Training Institutions, Corporates, the Government and Community led Institutions.
- **Direct Engagement:** In House implementation by Vedanta and/or through foundations set up for this purpose – including design and delivery of the project.

Annual Action plan shall be based on the project selected based on need assessment and baseline survey report. The CSR Committee shall decide on the CSR activities and formulate and recommend to the Board for approval of CSR annual action plan.

E. GOVERNANCE – REVIEW, MONITORING MECHANISM AND FORMULATION OF ANNUAL ACTION PLAN

We align our processes with Vedanta Technical standards throughout the life cycle of the project. Multi-tiered governance mechanism enables teams to critically evaluate the projects and make necessary course corrections whenever required. It includes:

- Internal reviews by CSR teams on periodic basis including approvals of specific projects, onboarding of Partners, Budgets, monitoring of audit reports and its compliances, review CSR process and its outcomes.
- CSR Exco & Mancom shall approve annual CSR plans & budget and review the progress of the programs once every quarter.
- CSR Committee of the Company, which shall meet twice a year to approve the annual CSR plan/budget, ensure CSR activities being undertaken as per the Board Policy and review the progress of the projects.

The Board shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the CFO or the person responsible for financial management shall certify to the effect.

The Surplus, if any, arising out of CSR initiatives of the Company shall not form part of the Company's business profits and any unspent amount (after utilizing excess spend from the said financial years) shall be categorized into ongoing/not ongoing project and deposited into Escrow/Fund as per the requirement of law.

Further, any amount spent by the Company in excess of the 2% obligation, the Company may carry forward the excess amount and set off the amount against the requirement to spend under Section 135(5) of Companies Act, 2013 up to immediate succeeding 3 financial years.

F. IMPACT ASSESSMENT OF PROJECTS/PROGRAMS

The Company shall undertake the impact assessment wherever applicable as per the below requirement under Companies Act, 2013:

Every Company having average CSR obligation of ₹ 10 Crore or more in pursuance of Section 135(5) of Companies Act, 2013, in three immediately preceding financial years, shall undertake impact assessment, through an Independent Agency, of their CSR projects having outlays of ₹ 1 Crore or more, and which have been completed not less than 1 year before undertaking the impact study.

Additionally, the Company shall undertake periodic impact assessment of other projects once every 3 years.

G. AUDIT

All CSR activities and expenses made thereon shall be subject to an audit by an external Independent Agency/Firm.

CSR Committee of the Company shall review the compliance to the requirement of the applicable provisions under Companies Act, 2013 and rules made thereunder including amendments thereto.

H. COMMUNICATION

We shall voluntarily communicate the results of our social programs to our stakeholders on a periodic basis.

I. RESPONSIBILITY

The Board constituted CSR Committee of the Company, along with the CSR team, shall be responsible for decision making with respect to the Company's CSR Policy.

J. REVIEW OF POLICY

The CSR Policy will be reviewed every three years or as may be recommended by the CSR Committee of the Company.

K. AMENDMENTS IN LAW

Any subsequent amendment/modification in the Companies Act, 2013 and/or other applicable laws in this regard shall automatically apply to this Policy.

Annexure – Key Areas for CSR Activities at Vedanta Limited

Thematic Areas and Project List

1. Children Wellbeing & Education

- Nand Ghar, Child Care Project, and similar programs for early childhood including setting up of Model Anganwadis under Nand Ghar.
- Shiksha Sambal, Shala Pravesh Mohotsav, Mo School, Project Ujjwal, Prerna, FACOR Sathi Shiksha Amrut Pariyojna, Company Run Schools and other educational initiatives including scholarship & Financial assistance to meritorious students in earmarked schools across communities.
- Unchi Udaan, Utkarsh Scholarships and similar initiatives to groom students for entrance to higher educational programs like Engineering, Medicine etc.
- Vedanta Computer Literacy Program, and similar ICT initiatives for pre-vocational training and introduction of Computer & technology to young minds.

2. Community Infra/ Mobilization

- Model village development projects like Gram Nirman, Village Development Centre, and similar Rural development projects for Community Asset creation Like roads, bridges, culverts, drains, rural electrification, water and water recharge infrastructure, community centers, including Education infrastructure, Health & Water infrastructure & rural infrastructure.

3. Healthcare

- Arogya, Nikshay Mitra, Vedanta Hospital, and similar projects for improving healthcare in the earmarked communities through mobile health vehicles/ camps/ telemedicine. Build/enhance/support hospitals and health initiatives including Hospitals being run through the investments.
- Initiatives on reducing malnutrition and focus on nutrition.
- Focus on Menstrual hygiene and nutrition of adolescents and women and its promotion thru creation of awareness, execution, and mass dissemination.

4. Disaster Management

- Natural Calamity relief and Safety response initiatives.

5. Water & Sanitation

- Swachhta, Tamira Surabhi and similar Sanitation and drinking water projects including restoration of traditional community water infrastructure.

6. Women Empowerment

- Sakhi, Subhalaxmi, and similar projects for capacity building of rural women on livelihood and community wellbeing.
- Setting up of rural and Peri urban Micro Enterprises led by and implemented by women for enhancing their economic capabilities including initiatives like Subhalaxmi Cooperative, Project TARA, Sakhi Utpadan Samiti, Jivika etc.

7. Sports & Culture

- Football & Archery related projects, Vedanta Football Schools, Archery Academy, Vedanta Sports Foundations, and similar projects.
- Cluster based sport promotion in communities including creation of infrastructure to promote these in the regions.
- Promoting culture including various aspects of tribal and culture heritage.

8. Livelihood

- Barmer Unnati, Sathi Pragati, Samadhan, Project Haryali and similar initiatives focusing on Agriculture, Livestock Development, water resource development in rural areas.

9. Skill Development

- Skilling including upskilling and reskilling initiatives like Vedanta Skill School, Sesa Technical School, Zinc Kaushal, Sesa Skilling market- Linked vocational/technical/professional training for youths.

10. Animal Welfare

- Projects like The Animal Care Organization and similar initiatives on welfare of biodiversity, flora and fauna across all geographies.