CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. INTRODUCTION

Bharat Global Developers Limited's Corporate Social Responsibility (CSR) commitment stems from the legacy of responsible corporate governance and the vision to improve the quality of life of the communities.

The Company serves the community through long-term value creation based on building sustainable and inclusive growth.

The Company believes that communities face unique and complex challenges, and its CSR strategy leverages the best of the organization's expertise to create bespoke, contextual and partnered solutions to address the needs of the most vulnerable sections of the community.

2. SCOPE OF THE POLICY

This Policy is applicable to all operations of **Bharat Global Developers Limited**, including its subsidiaries, and will ensure compliance with all applicable regulations in respective regions.

For India, the Policy will be operative within the overall ambit of the CSR provisions contained in the Companies Act, 2013, the Companies (Corporate Social Responsibility Policy) Rules, 2014 read with Schedule VII and amendments thereof, applicable from time to time (hereinafter collectively referred to as "CSR Provisions").

Our aim is to create 'Generational Improvement' at a person, community, region and country level, thereby creating large-scale societal impact.

In pursuit of this, the Company aims to:

1. Build deep and proactive partnerships with the community through multi-year programs which have clear goals for impact.
2. Empower communities through:

• Creation of Employment, Entrepreneurship and livelihood opportunities for youth and marginalized members of the community, and development of 21st century skills through Education and Skilling

• Support basic health and wellness; water, sanitation, and hygiene need of communities- especially those that are marginalized.

• Other projects in line with its vision, overall objective for community engagement and the applicable regulations

The efforts will be in line with the Company's support of the Government of India policies.

3. Leverage the best of the Company – intellectual, human, technology, and financial capabilities to:

• Create innovative solutions by leveraging diverse network of experts and applying contextual knowledge.

• Execute and scale programs using technology capabilities.

• Engage employees to volunteer their time, skills, and expertise as last-mile connectors.

• Undertake large, sustainable, multi-year, strategic CSR programs to create a broader and deeper societal impact.

4. Promote equitable access to resources by prioritizing those within the community who need it the most and create an inclusive process which facilitates access for all – especially for individuals and communities that are marginalized.

5. Understand and tailor each solution to the community, thereby facilitating a process to address the most essential needs of a community.

6. Leverage programs designed to lift individuals and communities step-by-step from one tier of economic opportunity to the next, enhancing their earning potential.

7. Drive global impact through alignment with and commitment to the United Nations Sustainable Development Goals (UN SDGs).

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3. CSR MODEL

As a global organization, the Company's CSR goal is to develop and implement programs that create equity and access to opportunities:

• In key focus areas
• For key stakeholder groups
• Through a defined engagement model aligned to CSR objectives

Key Stakeholders

• Youth
• Women
• Marginalized groups

Focus Areas

• Education
• Skilling
• Employment

• Entrepreneurship
• Basic health and wellness
• Water, sanitation and hygiene

Engagement Model

• Intellectual capital
• Technology capital
• Human capital
• Financial capital

3.1 STRATEGIC CSR FOCUS AREAS

By prioritizing focus on education, skilling, leading to creation of livelihood through employment, and entrepreneurship opportunities, the Company helps people and communities bridge the opportunity gap.

The Company also supports health and wellness; water, sanitation, and hygiene needs of communities, especially those that are marginalized.

• **Education & Skilling** – to equip youth, women and marginalized groups with skills to be successful in 21st century opportunities, resulting in creation of Employment and Entrepreneurship (self-employment), and leading to enhancement of livelihood.

• **Basic Health and Wellness** – to provide access to nutrition and create efficiencies for healthcare systems.

• **Water, Sanitation & Hygiene (WASH)** – to provide access to water, sanitation, and awareness of basic hygiene to help uplift communities.

The Company may also invest in conservation efforts and support relief efforts at the time of natural and man-made disasters.

The Company may also take up any other projects in line with CSR provisions and as approved by the CSR Committee from time to time.

3.2 KEY STAKEHOLDERS

• Youth
• Women
• Marginalized Groups

3.3 ENGAGEMENT MODEL

The engagement model leverages:

• Intellectual capital
• Human capital

• Technology capital
• Financial capital

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4. CSR PROJECT SELECTION FRAMEWORK

The Company has incorporated a project selection framework to ensure alignment with CSR objectives.

The Company aims to:

• Prioritize strategic multi-year CSR programs aligned with mission and focus areas

• Leverage engagement model

• Focus on areas where CSR intervention already exists

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5. GOVERNANCE

The CSR Committee shall:

• Formulate and recommend to the Board and periodically review the CSR Policy

• Formulate and recommend the annual action plan:

○ Indicate the list of activities to be undertaken by the Company in areas or subject. For India, this will be aligned to activities specified in Schedule VII of the Companies Act, 2013

○ Recommend the amount of expenditure to be incurred on the activities

• Monitor the implementation of the CSR Policy of the Company from time to time

• Monitor and report on the progress on the annual action plan

CSR implementation in India shall be periodically reviewed and monitored by the duly constituted CSR Committee of the Board.

The CSR initiatives of the Company will be executed by a skilled team who will ensure impact-focused delivery, implementation, monitoring, and reporting.

Any surplus arising out of CSR projects, programs, or activities shall not form part of the business profit of the Company and the same shall be spent on CSR activities.

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6. IMPLEMENTATION

Bharat Global Developers Limited implements programs that create large-scale social transformation, while focusing on the key challenges and issues in the community.

For this, it leverages an engagement model that makes use of its intellectual, technology, human, and financial capital (4Cs).

The implementation of programs in India will be aligned to Schedule VII of the Companies Act, 2013.

Proposals for new programs, as and when received, shall be evaluated in terms of appropriateness and alignment with Bharat Global Developers Limited's CSR Policy.

These programs may be implemented through one or more of the following modes:

i. Through NGOs, Trusts, government bodies, educational institutions, other corporates and industry associations, and other suitable implementing organizations

ii. Through organizations and multi-lateral entities with an established track record of at least three years in undertaking similar programs or projects

iii. Through joint ventures and associate companies of Bharat Global Developers Limited

iv. Through collaboration with other companies for undertaking projects, programs, or CSR activities

v. Self-executed i.e., directly undertake initiatives by building the CSR capacity of Bharat Global Developers Limited personnel

vi. Bharat Global Developers Limited Foundation

vii. A combination of any of the above modes from (i) to (vi)

Bharat Global Developers Limited may plan for or apply an exit strategy for a variety of reasons including by empowering communities to take ownership of the solution and investing in their own growth and transformational journey — thereby continuing to create impact.

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7. MONITORING AND REPORTING

Bharat Global Developers Limited aims to evaluate the impact of its CSR programs through a standardized methodology and process.

For an effective implementation of CSR activities and programs, an internal monitoring mechanism as developed by the CSR team will be put into effect.

The internal monitoring mechanism shall ensure the following:

i. Defined Process Owners for each process, program, and/or different levels within each program

ii. Periodic reporting to leadership on the amount spent and activity undertaken

iii. Impact measurement, including social upliftment and benefits to the community

iv. Report consolidation and communication to the CSR Committee of the Board

v. Annual review of CSR programs by the duly constituted CSR Committee of the Board

Bharat Global Developers Limited's intent is that the learning from implementing such programs would be used for generating awareness and creating a knowledge base to facilitate evidence-based decision-making within Bharat Global Developers Limited, by its partners and others in the broader ecosystem.

In India, an Annual CSR report and CSR Plan will be included in the Director's Report within the Annual Financial Report and placed before the Board by the CSR Committee for approval.

The CSR Report for India will adhere to the specific requirements of Section 135 of the Companies Act, 2013.

Within its operations, Bharat Global Developers Limited will ensure compliance with applicable regulatory reporting requirements for CSR, if any.

A consolidated report covering CSR activities will be included in the presentation to the Board.

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8. ETHICS AND COMPLIANCE

8.1 Ethics - Code of Conduct

The Code of Conduct is a set of principles that guide and govern the conduct of the Company and its employees in all matters relating to business and beyond.

In carrying out all its operations under CSR, **Bharat Global Developers Limited**, its joint ventures and its associates will comply with the statutes of the Code of Conduct.

8.2 Compliance with Local CSR Policies and Procedures

Bharat Global Developers Limited operates in various jurisdictions, and it is the Company's intention to comply with all applicable local statutory requirements.

Accordingly, if a provision of this Policy conflicts with the applicable local legal regulations, the Company will adopt country-specific policies on this subject to accommodate such local regulations.

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9. POLICY REVIEW

The Policy shall be subject to review as may be deemed necessary and in accordance with any regulatory amendments.

Key managerial personnel may review the Policy from time to time.

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10. REGISTER INTEREST

Organizations can register their interest to partner on programs.

Bharat Global Developers Limited will review partnership proposals based on factors including but not limited to capacity, expertise, and interest, as well as alignment to the Company's vision and mission.
