EMBASSY
SERVICES

EMBASSY SERVICES PRIVATE LIMITED CORPORATE SOCIAL RESPONSIBILITY POLICY

(CSR Policy)

POLICY FOR CORPORATE SOCIAL RESPONSIBILITY

(Policy last reviewed and amended on November 03, 2026)

I. INTRODUCTION:

Embassy Services Private Limited **("the Company")** is committed to achieving the highest standards of Corporate Governance, coupled with best-in-class practices across all its business operations, thereby ensuring adherence to its core values of Customer First, Transparency, Integrity and Professionalism.

The Company focuses on implementing robust, resilient and sound corporate practices in every facet of its operations and in all spheres of its activities, with the objective of generating greater returns and maximising shareholders' value, while contributing towards the social and economic development of the communities in which it operates.

This Corporate Social Responsibility Policy **("CSR Policy" or "Policy")** sets out the Company's approach towards identifying, undertaking, implementing and monitoring its Corporate Social Responsibility **("CSR")** activities in accordance with the applicable provisions of the Companies Act, 2013 and the rules made thereunder, as amended from time to time.

This Policy shall include any alterations, amendments or modifications made thereto from time to time in accordance with applicable law.

II. VISION STATEMENT, OBJECTIVE AND APPLICABILITY:

1. Our vision is – " to actively contribute to the social and economic development of the communities in which it operates and to build a better and sustainable way of life for the weaker sections of society, thereby contributing towards improving the country's human development index".

2. This CSR Policy has been formulated in accordance with Section 135 of the Companies Act, 2013 **("Act")**, read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 **("CSR Rules")**, Schedule VII to the Act and other applicable provisions, as amended from time to time.

3. Notwithstanding anything to the contrary contained in this CSR Policy, where the Company ceases to fulfil the criteria specified under Section 135(1) of the Act for three consecutive financial years, the Company shall not be required to:

   (i) Constitute a CSR Committee; and

   (ii) Comply with the provisions of Section 135(2) to Section 135(5) of the Act,

   until such time as the Company again meets the criteria specified under Section 135(1) of the Act.

4. Where the amount required to be spent by the Company towards CSR does not exceed ₹50 lakh, the requirement of constituting a CSR Committee shall not be applicable and the functions of the CSR Committee shall be discharged by the Board of Directors of the Company, in accordance with Section 135(9) of the Act.

III. DEFINITION AND INTERPRETATION:

Unless the context otherwise requires, the following expressions shall have the meanings assigned to them below:

1. **"Act"** means the Companies Act, 2013, read with the rules made thereunder, as amended from time to time.
2. "**Board**" means the Board of Directors of the Company.
3. "**Company**" shall mean **Embassy Services Private Limited** or **ESPL.**
4. "**CSR Activities**" means the projects or programmes or activities undertaken by the Company in areas or subjects specified in Schedule VII to the Act, in accordance with this CSR Policy, whether new or ongoing, excluding activities undertaken in pursuance of the normal course of business of the Company.
5. "**CSR Committee**" means the Corporate Social Responsibility Committee constituted by the Board in accordance with Section 135 of the Act and the CSR Rules.
6. "**CSR Rules**" means the Companies (Corporate Social Responsibility Policy) Rules, 2014, including any amendments thereto from time to time.
7. "**CSR Expenditure**" means the amount incurred by the Company towards CSR Activities approved by the Board on the recommendation of the CSR Committee, in accordance with the Act and the CSR Rules.
8. "**Director**" means a member of the Board.
9. "**Implementing Agency**" means an entity eligible to undertake CSR Activities on behalf of the Company in accordance with Rule 4 of the CSR Rules.
10. **"Authorised Persons"** means such officers or employees of the Company as may be authorised by the Board or the CSR Committee, as the case may be, to coordinate and facilitate the implementation of CSR Activities under this Policy.
11. "**Net Profits**" means the net profit of the Company calculated in accordance with Section 198 of the Act, excluding:
    (i) Any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
    (ii) Any dividend received from other companies in India which are covered under and complying with the provisions of Section 135 of the Act.
12. **"Ongoing Project"** means a multi-year project undertaken by the 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 projects that were initially not approved as multi-year projects but whose duration has been extended beyond one year by the Board based on reasonable justification
13. "**Society**" means a society registered under the Societies Registration Act, 1860 or any other applicable law in India.
14. "**Trust**" means a public trust registered under the applicable law in India.

Any term not defined above shall have the meaning assigned to it under the Act or the CSR Rules.

IV. CSR COMMITTEE:

In compliance with the requirements of Section 135 of the Act, the Board has constituted a CSR Committee comprising the following members:

1. Mr. Jitendra Virwani
2. Mr. Karan Virwani
3. Mr. Aditya Virwani
4. Mr. Saarang Ganapathi

The CSR Committee shall, inter alia, perform the following functions:

1. Formulate and recommend to the Board the CSR Policy indicating the activities to be undertaken by the Company in areas or subjects specified in Schedule VII to the Act.
2. Recommend the amount of expenditure to be incurred on CSR Activities.
3. Formulate and recommend an Annual Action Plan to the Board in accordance with the CSR Rules.
4. Monitor the CSR Policy and the implementation of CSR Activities from time to time.
5. Review the progress of CSR projects and programmes and recommend such changes or corrective measures as may be necessary.
6. Perform such other functions as may be prescribed under the Act and the CSR Rules from time to time.

V. IMPLEMENTATION OF THE CSR POLICY:

1. The CSR Committee shall ensure that the CSR initiatives of the Company are in line with this CSR Policy and the applicable provisions of the Act and the CSR Rules.

2. **Mode of Implementation:**

   The CSR Activities may be undertaken by the Company either directly or through eligible Implementing Agencies in accordance with Rule 4 of the CSR Rules, including:

   (i) 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 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company; or

   (ii) A company established under Section 8 of the Act, or a registered public trust or registered society established by the Central Government or any State Government;

   (iii) Any entity established under an Act of Parliament or a State Legislature; or

   (iv) 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 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

   The Implementing Agencies shall comply with the registration requirements prescribed under the CSR Rules, including filing of Form CSR-1, wherever applicable.

   The Company may also collaborate with other companies for undertaking CSR projects or programmes in such a manner that the respective CSR Committees are in a position to report separately on such projects or programmes in accordance with the CSR Rules.

3. The Board may authorise the Authorised Persons to coordinate and oversee the implementation of CSR Activities and to execute such agreements, deeds, writings, confirmations, undertakings or other documents as may be necessary with any party, including Implementing Agencies, for the purpose of implementing this CSR Policy, subject to the approvals and authorisations granted by the Board from time to time.

4. The Board shall remain responsible for ensuring that the CSR Activities are undertaken in accordance with the Act and the CSR Rules. In case of failure to ensure the minimum CSR Expenditure, the reasons for such failure shall be placed before the Board, and the Board shall disclose the same in its report in accordance with applicable law.

VI. CSR EXPENDITURE:

1. The total budget for CSR projects and programmes shall be recommended by the CSR

Committee in accordance with the applicable provisions of the Act and the CSR Rules. The Board shall approve the amount to be incurred towards CSR Expenditure and ensure that the necessary funds are available for undertaking the approved CSR Activities.

2. The Board shall ensure that relevant financial data and such other necessary details are made available to the CSR Committee to enable it to recommend the amount of CSR Expenditure to be incurred by the Company.
3. The Board shall ensure that the Company spends, in every financial year, at least two per cent of the average Net Profits of the Company made during the three immediately preceding financial years or, where the Company has not completed the period of three financial years since its incorporation, during such immediately preceding financial years, in pursuance of this CSR Policy.
4. Any expenditure incurred on activities undertaken in pursuance of the normal course of business of the Company or on activities not falling within the areas or subjects specified in Schedule VII to the Act shall not form part of CSR Expenditure.
5. The Board shall ensure that expenditure incurred towards building CSR capacities of the Company's own personnel and those of its Implementing Agencies, through institutions with an established track record of at least three financial years, including expenditure on administrative overheads, shall not exceed five per cent of the total CSR Expenditure of the Company in one financial year.
6. **Treatment of Unspent CSR Amount:**

   In the event the Company fails to spend the amount required to be spent under Section 135(5) of the Act, the Board shall ensure that:

   (i) In respect of any unspent amount relating to an Ongoing Project, such amount shall be transferred to the Unspent Corporate Social Responsibility Account within thirty days from the end of the financial year, in accordance with Section 135(6) of the Act.

   (ii) The amount transferred to the Unspent Corporate Social Responsibility Account shall be spent by the Company within a period of three financial years from the date of such transfer, failing which the unspent amount shall be transferred to a Fund specified in Schedule VII to the Act within thirty days from the date of completion of the third financial year.

   (iii) In respect of any unspent amount not relating to an Ongoing Project, such amount shall be transferred to a Fund specified in Schedule VII to the Act within six months from the expiry of the financial year, in accordance with Section 135(5) of the Act.
7. **Surplus Arising from CSR Activities:**

   Any surplus arising out of CSR Activities shall not form part of the business profits of the Company and shall be dealt with in accordance with Rule 7(2) of the CSR Rules, including being ploughed back into the same project or transferred to the Unspent Corporate Social Responsibility Account or a Fund specified in Schedule VII to the Act, as applicable.
8. **Excess CSR Expenditure:**

   Where the Company spends an amount in excess of its CSR obligation for a financial year, such excess amount may be set off against the CSR obligation for the succeeding three financial years, subject to the conditions prescribed under the CSR Rules and approval of the Board.
9. Expenditure incurred by the Company towards subscription to zero coupon zero principal instruments shall not exceed ten per cent of the total CSR Expenditure of the Company for the relevant financial year and shall be subject to the applicable provisions of Rule 4A of the CSR Rules.

10. Any contribution made directly or indirectly to any political party under Section 182 of the Act shall not be considered as CSR Expenditure.
11. CSR Expenditure shall not include activities undertaken exclusively for the benefit of employees of the Company and their families or any other expenditure specifically excluded under the CSR Rules.

VII. CSR ACTIVITIES:

1. The CSR Activities undertaken by the Company shall fall within the scope of the activities specified under Schedule VII to the Act, as amended from time to time, including the following:
   (i) eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach 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 centers 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 Government for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
   (ix) contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by Central Government or State Government or or Public Sector Undertaking or any agency of the Central Government or State Government; and 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;

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

(xiii) Subscription to zero coupon zero principal instruments on the Social Stock Exchange and

(xiv) Such other activities as may be specified under the Act or the CSR Rules from time to time.

2. The CSR Activities shall be undertaken in India only and preference shall be given to undertaking such activities in and around the local areas where the Company operates.

3. The CSR Committee shall provide recommendations to the Board with respect to specific CSR Activities falling within the scope of the activities specified under Schedule VII to the Act that may be undertaken by the Company.

4. The following details of any CSR Activity proposed to be undertaken by the Company shall be presented to the Board by the CSR Committee along with its recommendations:

   (i) The objectives and expected results of the CSR Activity;

   (ii) The relevant sector and the nature of the CSR Activity;

   (iii) The focus area/ location for implementation of the CSR Activity;

   (iv) The amount to be allocated towards the CSR Activity;

   (v) The indicative timelines for completion of the CSR Activity;

   (vi) Whether the CSR Activity is proposed to be undertaken directly by the Company, through an Implementing Agency or in collaboration with any other company; and

   (vii) Such other details as may be considered necessary.

5. In case any CSR Activity proposed to be undertaken is anticipated to be a long-term project, the CSR Committee shall submit a detailed implementation schedule, including milestones and timelines, to the Board for its consideration and approval.

6. Based on the recommendations of the CSR Committee, the Board shall approve the following:

   (i) The specific CSR Activities to be undertaken by the Company from time to time;

   (ii) The amount that should deployed towards such CSR Activity; and

   (iii) Whether the CSR Activities shall be undertaken directly by the Company, through an Implementing Agency or in collaboration with other companies, and record the reasons for the same, wherever required.

7. **Impact Assessment:**

   The Company shall undertake impact assessment, through an independent agency, wherever applicable, in respect of CSR projects having an outlay of one crore rupees or more and which have been completed not less than one year before undertaking the impact assessment, provided that the Company's average CSR obligation is ten crore rupees or more in the three immediately preceding financial years.

   The expenditure towards impact assessment shall be in accordance with the limits prescribed under the CSR Rules.

   In order to undertake impact assessment, the Company may incur an amount up to 2% of the total CSR expenditure for that financial year or ₹ fifty lakhs, whichever is higher and the same shall be considered as CSR expenditure for that financial year.

VIII. MONITORING PROCESS:

1. To ensure that the objectives of CSR Policy are being met in an efficient and effective manner, the utilization of the amount sanctioned towards CSR Activities should be reported by the Authorised Persons to the Board as well the CSR Committee on an annual basis in such manner as the Board may direct.
2. In the event any CSR Activities are undertaken through an Implementing Agency, the CSR Committee shall obtain relevant information from the Implementing Agency and review the progress of such CSR Activities, including utilisation of funds and achievement of the intended objectives.
3. The Authorised Persons shall periodically report the progress of CSR Activities to the CSR Committee and the Board in such manner and at such intervals as may be determined by the Board.
4. Upon receipt of progress reports, the CSR Committee may review and deliberate upon the same and provide such inputs or recommendations as it may deem necessary to the Board.
5. In case of Ongoing Projects, the CSR Committee shall monitor the implementation of such projects with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if required, within the overall permissible period, in accordance with the CSR Rules.
6. The CSR Committee shall institute a transparent monitoring mechanism for the implementation of CSR projects or programmes undertaken by the Company.
7. The Board shall review the recommendations of the CSR Committee and shall exercise its powers and responsibilities in accordance with the Act and the CSR Rules.

IX. REPORTING AND RECORD KEEPING:

1. The CSR Committee shall maintain proper minutes of all its meetings.
2. The Board's Report of the Company shall include an annual report on CSR containing the particulars prescribed under the Act and the CSR Rules.
3. The Board shall be responsible for ensuring that:

(i) The Board's Report includes the annual report on CSR Activities of the Company and sets out the requisite information in accordance with the Act and the CSR Rules;

(ii) The contents of the latest and updated version of this CSR Policy are disclosed in the Board's Report;

(iii) The contents of this CSR Policy and the composition of the CSR Committee are made available on the Company's website, if any, in accordance with the applicable provisions of the Act and the CSR Rules; and

(iv) In case of failure to ensure the minimum CSR Expenditure, the reasons for such failure are adequately disclosed in the Board's Report.

4. The Company shall maintain proper records and documents relating to the CSR Activities undertaken, amounts spent, funds transferred, utilisation certificates, progress reports and other relevant particulars, as may be required under applicable law.
5. The Company shall make all necessary filings and disclosures relating to CSR Activities, including filing of the prescribed annual CSR report and other forms or returns, as may be applicable under the Act and the CSR Rules.

X. AMENDMENT:

The Board of the Company may, subject to the recommendations of the CSR Committee, wherever applicable, and compliance with the provisions of the Act and the CSR Rules, at any time alter, amend or modify this CSR Policy as it may deem fit to ensure compliance with the statutory obligations of the Company and to facilitate the effective implementation of CSR Activities. Any amendment to this Policy shall be carried out in accordance with the applicable law.