



## CASPIAN IMPACT INVESTMENTS PVT LTD

### Corporate Social Responsibility Policy

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<i>Policy Owner</i>	<i>Avishek Gupta</i>
<i>Approved by:</i>	<i>Avishek Gupta</i>
<i>Confidentiality level:</i>	<b><i>Public (Level 1)</i></b>

*Levels of Confidentiality: Public (Level 1), Confidential (Level 2), Restricted (Level 3)*

*Please refer to Annexure I for summary of previous version changes*

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## Context

Caspian Impact Investments Private Limited (Caspian Debt) provides debt capital to a wide range of institutions that serve the low income or financially excluded communities, directly or indirectly, in a responsible, transparent and sustainable manner, with a focus on Microfinance, Small Business Financing, Affordable Housing, Food & Agriculture, Healthcare, Clean Energy & Energy Efficiency and other sectors with positive social and / or environmental impact.

Caspian Debt, have an in-depth knowledge of the financial and non-financial needs of the low income and economically disadvantaged sections of society. Caspian Debt is also a certified B Corporation, with high commitment to protect the interest of all stakeholders including the wider community and environment.

Caspian Debt is thus well positioned to continue to create positive impact on the lives of the disadvantaged through its CSR activities.

## CSR Focus Areas

In accordance with Schedule VII of the Companies Act, 2013, Caspian Debt will focus on the following areas in its CSR engagement:

- i. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently-abled and livelihood enhancement projects;
- ii. eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- 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, agro-forestry, conservation of natural resources and maintaining quality of soil, air and water;

Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government. The Focus Area for each financial year will be recommended to the Board by the CSR Committee and may include one or more of the aforementioned activities in any given year.

## Undertaking CSR Activities

Caspian Debt will engage in CSR through approved and reputed partners who are directly engaged in the CSR Focus Areas as approved by the Company. Contributions will be made to programs where direct impact is visible and is measurable.

Caspian Debt may also undertake its CSR activities through a company established under section 8 of the Companies Act, 2013.

Profit for the purpose of determining the minimum CSR Contribution shall be computed as per section 198 of the Companies Act 2013. Any surplus arising out of Caspian Debt's CSR activities, projects or programs shall not form part of the business profits of the Company.

### CSR Partners and Location of Activities

The CSR Partners in each Financial Year, the specific programs and the location of such programs shall be determined by the CSR Committee.

### CSR Committee

#### a. Constitution

The CSR Committee comprises the following members:

- a) Dr. Shailendra Kumar Joshi (Chair)
- b) Ms. Praseeda Kunam
- c) Mr. S Viswanatha Prasad

#### b. Responsibilities:

- (i) Formulating and recommending a CSR policy to the Board, indicating the Focus Areas and programs to be supported
- (ii) Recommending the amount of expenditure to be incurred on the activities indicated in the CSR Policy
- (iii) Undertake such CSR activities as approved by the Board.
- (iv) Monitor the implementation of CSR activities.
- (v) Ensure periodic reporting to the Board on the progress of CSR activities.

### Board's Rights and Responsibilities

- a. Constitution of a CSR Committee
- b. Taking into account the recommendations made by the CSR Committee, approve the CSR policy for the Company.
- c. Ensure implementation of activities under the Company's CSR Policy
- d. Ensure that 2% of the net profits as prescribed are spent on CSR activities
- e. Include details of CSR spend in the annual Directors' Report.
- f. In the event the Company fails to spend the prescribed amount, specify the

reasons for this in the Directors' Report.

## **Audit**

The Company's statutory auditor shall perform necessary audit procedures with respect to CSR expenses similar to auditing any other expense head. They will also validate the end use and the Schedule VII (Companies Act 2013) category, under which spend has been incurred.

### ANNEXURE I: Version Control Table

Version no.	Version Approval Date	Version Effective Date	Version Change Details	Version Owner	Version Approved by
1		01-Apr-2014	First version		
2	30-May-2018	30-May-2018	<ul style="list-style-type: none"> <li>Updated CASPIAN DEBT's target sectors</li> <li>Removed mention of GIIRS Rating</li> <li>Added mention B Corporation certification of the investment advisor, Caspian Impact Investment Adviser Private Limited</li> <li>Added under focus areas "contributions or funds provided to technology incubators as prescribed under the Companies Act, 2013".</li> <li>Added that CASPIAN DEBT may also undertake its CSR activities through a company established under section 8 of the Companies Act, 2013.</li> </ul>	Avishek Gupta, Business Head	Viswanatha Prasad, Managing Director
3.0	11-Feb-2022	09-Dec-2021	<ul style="list-style-type: none"> <li>Composition of CSR Committee was updated</li> </ul>	Ragini Chaudhary	Avishek Gupta, Managing Director
4.0	08-Dec-2022	08-Dec-22	<ul style="list-style-type: none"> <li>Changed CII to Caspian Debt</li> <li>Removed reference to Bellwether because it is no longer regulatorily required to refer to the former name.</li> <li>Added the section on funding incubators/accelerators as mentioned in Companies Act, 2013</li> </ul>	Ragini Chaudhary	Avishek Gupta, Managing Director