

Introduction

At Ambuja Cements Ltd. (ACL), the Corporate Social Responsibility (CSR) has been an integral part of the way we have been doing our business since inception. For more than 25 years, the Company's CSR initiatives has played pivotal role in improving the lives of the communities and society at large and in & around our operations with an objective to energize, involve and enable them to realise their potential. This has also enabled us to fulfil our commitment to be a socially responsible corporate citizen.

The CSR Policy of ACL is in consonance with Section 135 of The Companies Act, 2013. This policy also integrates the Holcim Policy Guidelines and is in compliance with the Holcim Code of Business Conduct.

ACL is committed to create a shared and sustainable value for all stakeholders and act as a responsible partner, to contribute to effectively improve the quality of life of the members of its workforce, their families and the communities around its operations. This commitment also extends to conducting business consistent with sustainable development principles in its operations, as well as with its suppliers and customers.

I. OUR VISION AND MISSION

Our vision is to be the most sustainable and competitive company in our industry.

Our mission is to create delighted customers, inspired employees, enlightened partners, energised society, and ensure a cleaner environment and safety for all.

II. OUR OBJECTIVE

The main objective of ACL's CSR policy is

- To lay down guidelines to make CSR a key business process for the sustainable development of society.
- To directly/indirectly undertake projects/programs which will enhance the quality of life and economic well-being of the communities in and around our plants and society at large.
- To generate goodwill and recognition among all stakeholders of the company.

III. OUR RESPONSIBILITIES

A) Towards our Communities

We will involve communities surrounding our operations to bring about a positive change in their lives through holistic, sustainable and integrated development.

B) Towards our Customers

We will build gainful partnerships with our customers to understand their needs and provide the right product and service solutions. We will adopt and actively encourage the best and fair business practices and shall endeavour to build solid bonds with them.

C) Towards our Business Partners

We will support our suppliers to cultivate ethical and fair business practices and give preference over others to those who demonstrate this.

D) As a Corporate Citizen

We reaffirm our commitment to conduct our business with environmental accountability. We will endeavour to adopt environment-friendly technologies and energy efficiency in our operations while continuously monitoring and reducing emissions.

E) Towards our Employees

1. We will foster a work culture with high ethical principles and standards and encourage our employees to perform with total integrity, commitment and ownership. We will do all we can to support their professional growth and recognise high achievers.

2. We value diversity and promote a workplace that is inclusive, fair and which fosters respect for all employees. We respect workers' rights, promote equal opportunities in recruitment, employment, promotion, development, compensation and retention and treat our workforce with dignity and respect.

3. We will continue to raise the bar with our Health & Safety standards and guidelines. We recognise that our employees and contractors deserve to work in a safe and healthy work environment and will make it our responsibility to ensure zero harm to people.

IV. CSR MAINSTAY

We promote social engagement and relationships with stakeholders based on mutual respect. A Stakeholder Engagement Plan (SEP) will be developed at our operational sites with an aim to build and maintain constructive relationship with stakeholders.

CSR activities at ACL shall be carried out through:

1. Ambuja Cement Foundation (ACF)

Ambuja Cement Foundation was established way back in 1993 as a social development arm of the Company that plans and implements strategic social investments with the rural communities surrounding its business sites. ACF works on issues related to Water Resource Management, Agriculture & Skill Livelihood generation, Health, Education, Women Empowerment and Rural Infrastructure.

The Foundation is engaged in a variety of people-centric, integrated rural development projects. It identifies key stakeholders as well as their primary needs for local development. Since inception, the Foundation has expanded its reach and diversified its programmes to include as many members of its stakeholder group as possible.

ACF encourages volunteering for ACL employees, on its projects.

2. Ambuja Vidya Niketan Trust (AVNT)

Ambuja Vidya Niketan Trust is a non-profit making trust promoted by Ambuja Cements Ltd. for providing quality educational facilities to the children in and around our manufacturing locations..

AVNT operates 5 schools across India, affiliated to C.B.S.E. Board .The schools provide an ambience to motivate learners to be creative in their responses, adopt a positive approach, to explore and innovate, thereby upholding the quest for knowledge. The values and skills which the students acquire in the process of learning go a long way in guiding and helping them to meet the challenges of life and achieve their goals and aspirations.

3. Ambuja Hospital Trust (AHT)

Ambuja Hospital Trust is a non-profit trust promoted by ACL to provide healthcare services to the community surrounding ACL's plant at Kodinar. Kodinar is a remote rural area with the nearest urban centre and multispecialty healthcare services being located more than 200 kilometres away.

4. Collaboration and partnerships with other Companies and development organisations undertaking projects/programs in CSR activities.

5. Collaboration and partnerships with the Government to implement programs and projects within the scope of our CSR activities.

6. Contribution / donation made to such other Organization / Institutions directly by the company as may be permitted under the applicable laws from time to time for fulfilling its responsibilities towards various stakeholders.

V. CSR ACTIVITIES

The scope of the CSR activities of the Company will cover the following areas but not limited to the same and may extend to other specific projects/ as permitted under the law from time to time.

Sr. No.	Area	Activities/Initiatives/Programs
1a.	Eradicating hunger, poverty and malnutrition	Agro Based livelihoods, Better Cotton Initiatives, Horticulture Plantation, Agro Farm Forestry, Agriculture Development, Krishi Vigyan Kendra.
1b.	Promoting health care including preventive healthcare and sanitation	Health and Sanitation Development programs, medical camps, programs for HIV / AIDS etc.
1c.	Providing safe drinking water	Drinking water programs, construction of check dams, dykes, ponds, links, channels, wells and water storage tanks.
2	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;	Construction and running of schools and libraries, vocational training and special education institutes, providing financial assistance and scholarships for higher education. Undertaking skills and entrepreneurship programs with an aim to provide technical education and services at places where institutional capabilities are not available or clearly insufficient and support measures to build more sustainable communities through creating employment opportunities. This includes skill training to gain employment in the

		construction sector like masonry, electricals, etc., industrial sector such as machine operations, welding etc., as well as for service sector such as hospitality, retail, office assistants, security guards, etc. Providing education campaigns and materials on issues such as road safety, health, and sustainable development, recycling and such.
3	Promoting Gender equality, Women Empowerment and Facilities for Senior Citizens	Setting up centres and institutions for women & senior citizenship. Promoting SHGs amongst women for undertaking income generating activities.
4	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;	Afforestation, projects on non-conventional energy (biogas), animal husbandry programs, forest conservation projects, water resource management and soil conservation, promoting micro-irrigation etc.
5	Promotion and protection of art & culture	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 arts and handicrafts.
6	Measures for the benefit of armed forces veterans, war widows and their dependents;	Activities/programs for benefit of armed forces and families.
7	Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;	Projects/programs promoting various sports activities

8	Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;	Projects/programs for the development and upgrading of technology.
9	Contribution/Financial Assistance	Contribution to Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situation Fund (PM Cares Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.
10	Rural development projects	Rural infrastructure projects and rural housing projects.
11	Slum area development	Projects related to slum area developments
12	Disaster management, including relief, rehabilitation and reconstruction activities	Donation towards relief and rehabilitation for the needy people.

VI. EXCLUSION FROM CSR

The following activity shall not form part of the CSR activities of the Company:-

1. The activities undertaken in pursuance of normal course of business of a company.
2. CSR projects/programs or activities that benefit only the employees of the Company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019).
3. Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
4. Any CSR projects/programs or activities undertaken outside India except training of Indian sports personnel.
5. Any activities incurred for the fulfilment of any Act/Statute or Regulations.

VII. CSR AND SUSTAINABILITY COMMITTEE

CSR and Sustainability Committee shall be formed as per the applicable laws and the Committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy. The CSR and Sustainability Committee shall submit periodical reports to the board of directors.

POWERS OF THE COMMITTEE

The CSR and Sustainability Committee has the powers to:

1. Formulate and recommend to the Board an Annual Action Plan which includes the modalities of utilisation of CSR funds and implementation schedules for the projects or programmes, monitoring and reporting mechanism for the projects or programmes.
2. Seek monitoring and implementation report from the Organisations receiving funds.
3. Delegate a designated company official to co-ordinate with the Organisation receiving funds to inspect the activities undertaken and ensure information in a timely manner.
4. Appoint Independent agency for undertaking the impact assessment of the CSR projects having outlay of Rupees One crore or more.

VIII. CSR SPEND/ SOURCES OF FUNDING

The committee shall endeavour to spend atleast 2% of the average net profit during the preceding 3 financial years on CSR activities as enumerated above. The allocation of the fund shall be made as follows:-

1. ACF, AVNT and AHT- such amount as may be sanctioned by the Board of Directors based on their annual budget. The amount sanctioned by the Board of Ambuja will have to be utilised for the projects/programs as specified by the CSR committees of Ambuja. The unspent amount, if any, at the close of the financial year shall be treated in accordance with the provisions of the Section 135 of Companies Act, 2013 and Rules made thereunder.
2. Others – as decided by the CSR Committee based on the evaluation of specific project/activities.

Any surplus arising out of the contribution made for CSR Activities shall not form part of the business profit of the Company and be utilized in accordance with the Section 135 of the Companies Act 2013 and Rules made thereunder.

IX. IMPLEMENTATION

Project /programs covered under CSR activities shall be implemented by the Company through:

A) Ambuja Cement Foundation, CSR arm of the Company.

B) Ambuja Vidya Niketan Trust

C) Ambuja Hospital Trust

D) In collaboration with other Companies undertaking projects/programs in CSR activities. The CSR committees of respective companies should be in a position to report separately on the progress of the projects/programs.

E) Any entity established under an Act of parliament or a State legislature.

F) Any other Section 8 Company, registered public trust or society, institutes, NGOs, Government, Semi-government, autonomous bodies, trusts etc. However, any such projects/ program to be undertaken through these entities shall have an established track record of 3 years of undertaking similar activities.

The time period/duration of each project/program shall depend on its nature, extent of coverage and intended impact of such activity.

X. MONITORING, REPORTING

The CSR and Sustainability Committee will be responsible for the monitoring of CSR activities and report to the Board from time to time.

The following processes will be followed:

A. Activities and Budget

The activities and budgets for CSR will be presented in detail to the Committee for the following:

- ACF Budget and Activities

- AVNT Budget and Activities
- AHT Budget and Activities

Additionally, the Committee may empower the CEO and CFO to spend such amount as they think appropriate for some other strategic CSR contingencies that may arise during any financial year. All such contributions should be made with a thorough due diligence process, transparent documentation of the purpose of contribution, recipient details, amounts requested and received. However, such one off donations will be discouraged as far as possible. The amount spent as above shall be put up for ratification of the Committee at its next meeting and shall be reported to the Board accordingly.

B. Continuous Monitoring

- The Committee Members will receive in a prescribed format, a quarterly report of CSR spend;
- A presentation on the progress of the CSR projects / activities will be made to the Committee by the CSR Executives at the Committee meetings held from time to time;
- An annual presentation will be made to the Committee which will also include the details of the projects / activities planned for the next year and its respective budgets

The Board of Directors of Ambuja shall periodically review the implementation of CSR activities.

XI. DISCLOSURES

The CFO shall certify to the fact that CSR funds so disbursed have been utilised for the purposes and in the manner approved by the Board.

The Annual Report of the Company include a section on CSR outlining the CSR Policy, CSR & Sustainability Committee, CSR initiatives undertaken by Company, the CSR spend during the financial year and other information as required by the prevailing law.

XII. GENERAL

The Board of Directors of the Company shall have the powers to revise/modify/amend this Policy from time to time, as the Board may deem fit, based on the recommendations to be made by the CSR and Sustainability Committee.

Sd/-

Neeraj Akhoury
Managing Director & CEO

Sd/-

N.S. Sekhsaria
Chairman
CSR & Sustainability Committee

Date	23 rd July, 2021
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ANNEXURE: DEFINITIONS

- **Donations:**

Donations are voluntary one off contributions to an institution or organization where ACL does not receive or expect to receive anything in return, except for donations given to ACF/AVNT/AHT which are meant for Strategic Social Investment. Donations can be monetary or in kind support, such as the supply of material.

- **Partnerships:**

Partnership is an agreement with different organisations to cooperate to advance mutual interests. Partnerships increase the likelihood of achieving the company's mission and to amplify its reach.

- **Stakeholder:**

Stakeholders are all those who exercise or could exercise, influence over the activity of a site and all those who are, or could be influential/ impacted by the activity of a site.

- **Stakeholder Engagement:**

Stakeholder engagement is the process used by the organisation to engage relevant stakeholders for a purpose to achieve agreed outcomes. It is formalized in a Stakeholder Engagement Plan (SEP). SEP facilitates the site to clearly explain the benefits for the stakeholders from ACL operations and enables stakeholders to raise their concerns. Engagement enables us to better understand the stakeholder issues and gain their trust in defining new project.

SEP includes mapping and prioritizing stakeholders, conducting consultations with internal and external stakeholders to consider, map and review risks relating to ACL's operations, developing and defining an activity for each stakeholder and a mitigation plan for each risk identified, and implementing the defined SEP according to the local context. Community Advisory Panel is a formal structure of a cross section of Stakeholders that meet regularly to discuss diverse topics and would be an integral part of SEP.

- **Strategic Social Investment:**

It is a way to promote local development and benefit stakeholders where we operate. It is a long term initiative coordinated and executed in collaboration with a community institution or organization. The company does not expect or receive a business or financial advantage in return (non-profit oriented).