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POLICY ON CORPORATE SOCIAL RESPONSIBILITY



CSR Department

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Record of Last 3-year Amendments		
Reviewer	Approver	Approval Date
CSR Committee	Board	28.10.2024
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Policy on Corporate Social Responsibility for FY 2025-2026.

Introduction.

Corporate Social Responsibility (CSR) has always been a key component of the operating philosophy of Federal Bank. Federal Bank Hormis Memorial Foundation, a charitable trust set up by the Bank in 1996, in the fond memory of its Founder Shri. K P Hormis, is the Special Purpose Vehicle to undertake CSR activities of the Bank.

The Bank has a Corporate Social Responsibility (CSR) Policy which is approved by the Board of Directors of the Bank, as mandated by the Companies Act, 2013. The Policy elucidates in detail the CSR Vision of the Bank through the focus areas as notified under Section 135 of the Companies Act 2013, read with Companies (Corporate Social Responsibility Policy) Rules 2014 and the objectives of the Federal Bank Hormis Memorial Foundation.

As mandated by the amendments in CSR Rules, 4(2)(a), 2014; Federal Bank Hormis Memorial Foundation is registered for undertaking CSR activities and the Registration number is CSR00006299.

Most of the activities are implemented by the Trust set up by the Bank, which acts as a special purpose vehicle for the implementation of CSR Activities, with due compliance of the applicable statutory provisions.

Legal Framework of CSR Policy.

Section 135 of the Companies Act 2013 (hereinafter referred to as the Act), effective from 01.04.2014, read with the Companies (Corporate Social Responsibility Policy) Rules 2014, as amended from time to time, lays down the legal framework for the Bank's CSR policy, guided by the core values of quality, reliability and trust, and passion for excellence pursued by the Bank at all levels.

Corporate Vision and Objective of the Policy.

The Bank desires to make a meaningful contribution for the improvement of those people who are at the bottom of the economic pyramid, and thereby act as a socially conscious, well governed, and successful corporate citizen of the country, maintaining highest standards of corporate governance with the cooperation and involvement of its employees, constituents, society, shareholders, and other stakeholders including the Government.

The Bank ensures that the activities are undertaken in a manner that every rupee spent for this purpose brings maximum relief to the intended beneficiaries and thereby contributes to the long-term development of the society. The Bank aims to do this by engaging in activities that provide

socially and environmentally sustainable benefits for the beneficiaries, measurable in economic terms. This demonstrates the social commitment of the Bank, in the same manner as it serves the interest of the customers, employees and shareholders, integrating the social and business goals.

The Bank actively explores to develop sustainable infrastructure-oriented CSR projects aimed at creating a long-lasting positive impact on the community. These initiatives are envisioned to have enduring benefits for the communities they serve while simultaneously enhancing the Bank's brand reputation and visibility in the process.

CSR through Employee Volunteering.

The Bank ensures employee engagement and encourages employee involvement in the social responsibility activities of the Bank through various programs every year. The Bank budgets a specific amount under Employee Volunteering, and the same is reached out to the needy through well-planned team activities. The CSR Committee takes required decisions, gives necessary guidance, and monitors the Employee Volunteering activities.

The efforts put in by employees are documented and made available publicly so as to improve the morale of the employees in CSR activities.

The activities are carried out only in India, particularly in areas of operation of the Bank.

Scope.

This policy applies to all projects/programs undertaken as part of the Bank's Corporate Social Responsibility activities and is developed, reviewed, and updated. It is also in line with Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility) Rules, 2014, as amended from time to time (the Act).

Governance.

Overall governance of CSR and approval of the CSR Policy is the responsibility of the Board.

- The CSR Committee formulates and recommends to the Board an annual action plan in pursuance of its CSR Policy.
- The Board ensures proper implementation of the CSR Policy along with monitoring and reviewing CSR Activities undertaken by the Bank and provides inputs as and when required.

- The Board satisfies itself that the CSR funds so disbursed are in alignment with the CSR Policy of the Bank and have been utilized for the purposes and in the manner approved by it. The CFO or appropriate authority certifies the same to the effect.
- The Board also ensures appropriate disclosures pursuant to the Act and amendments thereof on the Annual Reports and Bank's website in prescribed formats.
- In case of an ongoing project, as defined under Rule 2(1)(i) of the Companies (CSR Policy) Rules 2014, the Board of a company monitors the implementation of the project with reference to the approved timelines and year-wise allocation and is competent to make modification, if any, for smooth implementation of the project within the overall permissible time period.

The CSR Department of the Bank is responsible for administering and executing the policy. As the Bank's CSR activities evolve further, the policy may be revised with the approval of the Board as per the recommendations of the CSR Committee.

Functions of the Corporate Social Responsibility Committee.

The Bank constitutes a CSR Committee of the Board consisting of three or more directors including at least one Independent Director. The constitution of CSR Committee of the Board is given as Annexure-I. The following functions are assigned to the Committee:

- Formulates the Bank's CSR policy and goals and revision thereof, as may be required, and recommends to the Board.
- Formulates an Annual Action Plan pursuant to the CSR Policy.
- Identifies the areas of CSR activities as prescribed in Schedule VII of the Companies Act, 2013 and amendments thereof to the Act, and recommends the amount of expenditure to be incurred on such CSR activities/projects within the board-approved budget plan.
- Monitors the Bank's CSR policy and performance from time to time to ensure that the Bank meets the mandatory CSR compliance requirement.
- Reviews the CSR projects/initiatives from time to time and recommends any alteration in the annual action plan, if any, to the Board.
- Ensures impact assessment, if any, for the projects with an outlay of ₹1.00 Cr or more.
- Ensures legal and regulatory compliance from a CSR viewpoint.

- Ensures reporting, communication, and appropriate disclosures to stakeholders on the Bank's CSR projects/initiatives.
- Ensures that the surplus arising from the CSR projects or programs or activities does not form part of the business profit of the Bank.

CSR Budget.

The Board ensures that 2% of average profit before tax from the immediately three preceding years is spent on CSR initiatives undertaken by the Bank. The overall amount to be committed to CSR is approved by the Board as recommended by the CSR Committee through its Annual Action Plan carrying the list of CSR projects or programs.

The following guiding principles are to be adhered to in terms of CSR Budget outlay & Expenditure:

- The administrative overheads do not exceed five percent (5%) of the total CSR expenditure of the Bank for the financial year.
- Any surplus generated from CSR activities does not form part of the business profit of the Bank and is treated as follows: a. Ploughed back into the same project. b. Transferred to a designated Unspent CSR Account and spent in pursuance of the CSR Policy and Annual Action Plan of the Bank. c. Transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- Any unspent amount is reported by the Board under clause (o) of subsection (3) of section 134 in its report specifying the reasons for not spending the amount and transfers the unspent CSR amount as per provisions of section 135(5) and 135(6) of the Act.
- As per Clause 7(4) of CSR Policy Rules 2014, CSR amount may be spent for creation/acquisition of a capital asset which is held by the beneficiaries of the said CSR project or a trust or a public authority for the benefit of all. The company takes appropriate measures to ensure that such assets are utilized for the purpose they are meant for and are not transferred or disposed of without prior permission of the company.

Excess CSR Spending if any, during any financial year.

If the Bank spends an amount in excess of the requirements provided under Section 135(5), the Bank may set off such excess amount against the requirement to spend under Section 135(5) for a period of three succeeding financial years, subject to the conditions that –

- i. The excess amount available for set-off does not include the surplus arising out of the CSR activities, surplus being the income generated from the spend on CSR activities such as interest income earned on CSR funds, revenue received from CSR projects, disposals/sale of materials used in CSR projects, and other similar income sources.
- ii. The Board of the Bank passes a resolution to that effect.
- iii. The surplus arising out of CSR activities is utilized only for CSR purposes.

Supervision.

The Bank's CSR activities are driven by a dedicated CSR team under the guidance and support of senior functionaries. The CSR Committee and CSR Department under the direction of the Board play a significant role in ensuring that the CSR policy is embedded in the Bank's operations and the CSR initiatives are in line with the policy.

Disbursement.

The disbursement of funds is either in tranches/stages or as a onetime payment depending on the nature and requirements of the project. The terms, conditions, and timing of disbursement are discussed and agreed upon in the memorandum of understanding with the entity before implementing the project.

Reporting.

Appropriate disclosures and reporting on all CSR activities and assessments done by the Bank are provided as part of the Director's Report in the Bank's Annual Report and Bank's Official website in the prescribed formats as per statutory and regulatory reporting requirements of the Act.

Connect with Local Community and Linking business with CSR.

Adequate thrust is given to geographical areas where the Bank has more presence, to get maximum leverage of connectivity with the local community.

Decriminalization of offences in case of breach.

As per Sec 135(7), if a bank is in default in complying with the provisions of sub-section (5) or sub-section (6):

- i. The Bank is liable to a penalty of twice the unspent amount required to be transferred by the Bank to the Fund specified in Schedule VII or the Unspent Corporate Social Responsibility Account, or one crore rupees, whichever is less.
- ii. Every officer of the Bank who is in default is liable to a penalty of one-tenth of the amount required to be transferred by the Bank to such Fund specified in Schedule VII or the Unspent Corporate Social Responsibility Account, as the case may be, or two lakh rupees, whichever is less.

Spending for ongoing projects and its utilization mechanism.

Any amount remaining unspent under section 135(5), pursuant to any on-going project undertaken by the Bank will be transferred by the Bank within a period of thirty days from the end of the financial year to a special account –Unspent CSR Account opened by the Bank in that behalf for that financial year.

This amount will be spent by the Bank within a period of three financial years from the date of such transfer, failing which, the Bank will transfer the same to a fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

“On-going Project” is defined as a multi-year project undertaken by the Bank in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced and shall include such project that was initially not approved as a multi –year project but whose duration has been extended beyond one year by the board based on reasonable justification.

Officer in default in case of violation of regulatory provisions.

Head of CSR – Corporate Social Responsibility Department is the person responsible for ensuring regulatory compliance.

Guiding Principles on formulation of the Annual Action Plan to initiate CSR project.

- i. The programs/projects are within the areas recommended/listed in Schedule VII of the Act and mentioned in the Policy.
- ii. The programs/projects are implemented within the country and preferably in areas where the Bank has its presence.
- iii. Programs/Projects are not exclusively for the benefit of employees of the company or their family members or those that are conducted/undertaken exclusively in pursuance of the normal course of business.
- iv. The programs/projects exclude activities that are supported on a sponsorship basis for deriving marketing benefits for its products or services.
- v. The programs/projects exclude activities carried out for fulfillment of any statutory obligations under any law in force in India.

Guiding Principles on Selection, Implementation and Monitoring of CSR projects.

The CSR Department under the guidance of the CSR Committee assists in implementation, monitoring, and proper end use of the CSR projects/initiatives.

Guiding Principles for initiating CSR Programs/ Projects.

To provide a focused and structured approach to the program, the Bank focuses its support, and CSR spends on specific pre-determined causes and areas of intervention as outlined in the policy.

The CSR Committee formulates an annual action plan in pursuance of this CSR policy and recommends it to the Board for its approval. It includes the following:

- i. The list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act.
- ii. The manner of execution of such projects or programs.
- iii. The modalities of utilization of funds and implementation schedules for the projects or programs.
- iv. Monitoring and reporting mechanism for the projects or programs.
- v. Details of need and impact assessment, if any, for the projects undertaken by the company.

Impact Assessment for projects having outlays of ₹1.00Crore and above.

Every entity having an average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, undertakes impact assessment through an independent agency of their CSR projects having outlay of ₹1.00 Crore or more, which are completed not less than one year before undertaking the impact study.

The Bank undertakes impact assessments of CSR projects having outlays of ₹1.00 Crore and above with the help of independent agencies.

The reports of impact assessment are placed before the CSR Committee and are annexed to the Annual report of the Bank.

CSR initiatives covered by the Policy.

In accordance with the corporate philosophy outlined above, and the framework of the Companies Act 2013, as amended from time to time, the thrust areas of CSR activities of the Bank are:

- 1. Employee Volunteering Activities:** Employee volunteering is encouraged to enable all employees to participate in socially relevant and beneficial projects as mentioned in our CSR initiatives that allow them to collaborate their eco-systems and contribute to the society, acting as change -makers.
- 2. Poverty Alleviation:** Eradicating hunger, poverty and malnutrition, Providing safe drinking water, Housing to economically backward sections of society, Healthcare including preventive healthcare and Trauma-care in high-ways, Improved sanitation and hygiene and other measures for reducing inequalities faced by socially and economically backward sections of society including contribution to funds set up by Central Government for promotion of sanitation, supporting Swachh Bharat Kosh by constructing toilets for the poor, e-toilets at public places, support for re-cycling of plastic, e-waste etc., awareness and public outreach on cancer care program under preventive health care.**(UNSDG-No Poverty).**
- 3. Education and skill development:** Promoting education including special education and vocational education including skill development for children, women, and differently abled and livelihood enhancement projects, creating awareness against Child abuse and other activities within the overall objective of promoting education, youth engagement activities, awareness, and public outreach on cancer care program under promoting education.**(UNSDG-Quality Education).**

4. **Gender equality and welfare of Senior citizens:** Undertaking activities for gender equality including but not limited for empowerment of women, self-help groups and similar organizations, setting up homes and hostels for women and orphans, setting up old age homes, day care centers and such other facilities for Senior citizens. **(UNSDG-Gender Equality, No Poverty).**
5. **Ensuring environmental sustainability and ecological balance:** Undertaking activities with the overall objective of ensuring environmental sustainability and ecological balance, protection of flora and fauna, planting of trees, animal welfare, agro-forestry, conservation of natural resources including maintaining quality of soil, air and water, renewable energy and other activities within this overall objective of environmental sustainability including contributions to funds set up by Central Government for rejuvenation of river Ganga.**(UNSDG -Climate Action, Affordable and Clean energy, Clean Water & Sanitation).**
6. **Protection of national heritage:** Providing 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.
7. **Benefit of armed forces veterans:** Taking up projects or activities intended for providing benefit of armed forces veterans, war widows and their dependents. **(UNSDG-Sustainable Cities & Communities).**
8. **Promote rural, nationally recognized, Paralympic and Olympic sports** by supporting training for attaining excellence in all areas of sports. **(UNSDG - Good Health & Wellbeing).**
9. **Contribution to the Prime Ministers National Relief Fund or any other Funds** 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. **(UNSDG - Partnership for the Goals).**
10. **Contribution to** a) technology incubators/research and development projects in the field of science, technology, engineering, and medicine funded by Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government.

b) public funded universities, IITs, National Laboratories and Autonomous Bodies(established under Indian Council of Agricultural Research(ICAR), Indian Council of Medical Research(ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy(DAE), Defense Research Development Organization(DRDO), Department of Bio technology(DBT), Department of Science and Technology(DST), Ministry of Electronics and Information Technology conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals(SDGs).**(UNSDG Quality Education, Industry Innovation & Infrastructure).**

11. Development projects for rural areas and areas declared by Government as slum areas. **(UNSDG -Sustainable cities & communities, Reduced inequalities).**

12. Disaster Management: Disaster management including relief, rehabilitation, and reconstruction activities, awareness, and public outreach on Cancer Care Program and Covid relief measures (Pandemic). **(UNSDG -Good Health & Wellbeing).**

13. Promotion of Digital Payments: In line with Government of India's move towards promoting cash less economy providing seamless digital payment to all, focusing rural and semi urban areas.

The above objectives are broad based and are construed in a liberal manner within the framework of the Act.

Proposed Core CSR activities for the Financial Year 2025-2026.

1.	Developing sustainable infrastructure-oriented CSR projects aimed at creating a long-lasting positive impact on the community.
2.	Employee Volunteering Activities.
3	Promoting Education: -Youth engagement.
4	Promoting Education: - Promoting Vocational Skills/Skill development, Empower and skill persons with disabilities, other supports for the development of education.
5	Promoting Healthcare.
6	Welfare & Poverty Alleviation.
7	Promoting Women Empowerment.
8	Rural Development.
9	Environmental Sustainability, Swachh Bharat & Renewable Energy.

Validity of this policy: This policy is effective from the beginning of the financial year 2025–2026.

ANNEXURE I

Constitution of Corporate Social Responsibility Committee of the Board.

No	Name	Role
1	Mr. Sankarshan Basu, Independent Director	Chairman
2	Mr. Krishnan Venkat Subramanian, MD & CEO	Member
3	Mr. Harsh Dugar, Executive Director	Member