

## TRIDENT LIMITED

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| Name of the Policy               | Corporate Social Responsibility (CSR) Policy                                                                          |
| Policy Custodian                 | Company Secretary                                                                                                     |
| Date of Latest amendment/ review | <ul style="list-style-type: none"><li>• November 14, 2023</li><li>• January 24, 2025</li><li>• May 19, 2026</li></ul> |

## **Corporate Social Responsibility Policy**

### **I. PREAMBLE**

Trident Limited (“Trident” or “the Company”) is governed by the Companies Act, 2013 (“the Act”), the rules and regulations framed thereunder by Ministry of Corporate Affairs (“MCA”) and Securities and Exchange Board of India (“SEBI”) LODR Regulations, 2015 (“LODR Regulations”).

Section 135 of the Act requires the Board of Directors (“Board”) of the Company after taking into account the recommendations made by the Corporate Social Responsibility (“CSR”) Committee, to approve the CSR Policy for the Company and disclose contents of such Policy in its report and also place it on the Company’s website.

The Company believes in corporate excellence and social welfare. This corporate philosophy is the force for integrating CSR in values, culture, operation and business decisions at all levels of the Company. Being a responsible corporate citizen, Trident has a value system of giving back to society and improving life of the people and the surrounding environment. The Company is committed to make substantial improvements in the social framework of the nearby community. Looking at the social problems which the country faces today, the contribution by any corporate may look tiny. However, we believe that every such contribution shall bring a big change in our society.

### **II. DEFINITION**

1. “Act” means the Companies Act, 2013 and rules framed thereunder;
2. “Company”/“This Company”/“The Company” means “Trident Limited”.
3. “Corporate Social Responsibility (CSR)” carries the same definition as provided under the Act or Rules made thereunder;
4. “CSR Committee” means the CSR Committee of the Board referred to in section 135 of the Act;
5. “CSR Policy” means a statement containing the approach and direction given by the board of the Company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan;
6. “Net profit” means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:
  - 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;
7. “On-going projects/ Long Term Projects” means a multi-year project undertaken by the Company, as approved by the Board, 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.

Any project(s) whose duration has been extended beyond one year, shall be considered as Long Term Projects / On-going projects, with the approval of the Board.

### III. INTERPRETATION

Words and expressions used and not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013 or rules made thereunder, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any other Guidelines/ Regulation(s) promulgated by SEBI/ other statutory authorities and any amendments thereto from time to time.

### IV. GUIDELINES

#### 1. Role of CSR Committee

The CSR Committee of the Company will be responsible:

- i. To formulate and recommend to the Board, a CSR Policy indicating the activities to be undertaken by the Company in areas or subject specified in Schedule VII to the Act;
- ii. To recommend the amount of expenditure to be incurred on the activities referred to in clause (i);
- iii. To formulate and recommend to the Board, an annual action plan in pursuance of CSR Policy;
- iv. To recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect;
- v. To monitor the CSR Policy as approved by the Board from time to time;
- vi. To monitor the implementation of the framework of CSR Policy;
- vii. To carry out any other function as mandated by the Board from time to time and/ or enforced by any statutory notification, amendment, or modification as may be applicable or as may be necessary or appropriate for the performance of its duties.

The Constitution and the role of the CSR Committee shall be in accordance with Section 135 and other applicable provisions of the Act and the CSR Rules, including any modifications or amendments thereto. All the CSR activities recommended by the CSR Committee and approved by the Board shall be in compliance with Schedule VII of the Act.

#### 2. CSR Activities

The CSR initiatives of the Company are identified in consultation with the management, social experts, community and other stakeholders. The implementation strategy is planned in a way so as to give sustainable and scalable solutions.

The identified focus areas for the Company are:

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh 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 centres 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 setup 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 arts and handicrafts;
- vi. Measure for the benefit of armed force 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 Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- ix. (a) 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; and  
 (b) 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:  

The term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force;
- xii. disaster management, including relief, rehabilitation and reconstruction activities;
- xiii. Such other activities as may be recognized by the Committee/Board or as may be required/ permissible under prevailing law(s).

### 3. Annual Action Plan

For every financial year, the CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of the CSR Policy, which shall include the following, namely:

- i. The list of CSR projects or programmes to be undertaken in areas or subjects specified in Schedule VII of the Act;
- ii. The manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4 of CSR Rules;
- iii. The modalities of utilisation of funds and implementation schedules for the projects or programmes;
- iv. Monitoring and reporting mechanism for the projects or programmes; and
- v. Details of need and impact assessment, if any, for the projects undertaken by the Company.

Provided that Board may alter such Annual Action Plan at any time during the financial year, as per the recommendation of CSR Committee, based on the reasonable justification to that effect.

### 4. CSR Expenditure

- i. The Board shall ensure that the Company spends in every financial year, at least two percent of the average Net Profits of the Company made during the three immediately preceding financial years on CSR projects in accordance with the Policy.
- ii. CSR expenditure in a financial year in excess of 2% of the average net profits of the Company during the three immediately preceding financial years, may be set off against the CSR contribution in succeeding three financial years with the approval of the Board by way of a resolution, as permissible under the provisions of the Act. Provided that the excess amount available for set off shall not include the surplus arising out of the CSR activities.
- iii. Any surplus arising out of the CSR projects, programmes or activities shall not form a part of the business profits of the Company and will be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- iv. Where, the Company fails to spend CSR Amount, the Board shall, in its report specify the reasons for not spending the amount and, unless the unspent amount relates to any ongoing project, transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- v. Any CSR Amount remaining unspent pursuant to any ongoing project, undertaken by a Company in pursuance of its CSR Policy, shall be transferred by the Company within a period of thirty days from the end of the financial year to a special account to be opened by the Company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the Company in pursuance of its obligation towards the CSR Policy within a period of three financial years from the date of such transfer, failing which, the Company shall 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.

- vi. The Company may create/acquire a capital asset under a CSR project in accordance with the provisions of section 135 the Act and the CSR Rules, and such capital asset shall be held by:
  - (a) a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number; or
  - (b) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
  - (c) a public authority;

## **5. Implementation Process**

The Company shall undertake CSR activities in any one or more of the following manner subject to the provisions of rule 4 of the CSR Rules:

- i. directly by itself;
- ii. a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government and registered with MCA to undertake CSR activities;
- iii. any entity established under an Act of Parliament or a State legislature to undertake activities covered in Schedule VII of the Act and registered with MCA in this regard;
- iv. Through a company registered 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 ('CSR Agency') established by the Company either singly or along with any other company, and registered with MCA to undertake CSR activities;
- v. In case of any registered trust/society/company not established by the Company- Through a CSR Agency registered with MCA to undertake CSR activities and having 3 years track record of undertaking similar projects.

## **6. Monitoring mechanism**

- i. The implementation of the CSR Policy and execution of projects, programmes and activities undertaken by the Company shall be carried out under the overall superintendence, control and guidance of the CSR Committee. The CSR Committee shall closely monitor such activities and may also further constitute internal monitoring groups and/or sub-committees for different projects, programmes and activities, as may be required from time to time. The CFO of the Company shall on an Annual basis, give utilisation certificate of disbursement of funds made for CSR.
- ii. The minutes of the meetings of the CSR Committee shall be placed before the Board of Directors for their information. The Board of Directors shall have the power to make amendments, suggest new measures and/or otherwise amend the powers of the CSR Committee from time to time.

- iii. If the Company is having average CSR obligation of ten crore rupees or more in pursuance of sub-section (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.
- iv. The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.
- v. The Board may require Impact assessment of any CSR project, if deem necessary, irrespective of the fact that it is required under the Act or not.

#### **7. Reporting**

- i. The Company shall disclose the composition of the CSR Committee, CSR Policy and approved CSR Projects on its website;
- ii. The Annual Report on CSR activities shall be included in the Board's Report of such financial year as per the format prescribed under the CSR Rules.

#### **V. LIMITATION AND AMENDMENT**

In the event of any conflict between the provisions of this Policy and the Act, rules or any other statutory enactments, then such Act, rules, or statutory enactments, shall prevail over this Policy. Any subsequent amendment / modification in the Act, Rules and/or applicable laws in this regard shall automatically apply to this Policy.

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