

Creative Graphics Group

Corporate Social Responsibility Policy (CSR Policy)

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1. Introduction

This CSR Policy has been framed by **Creative Graphics Group** (the Company) in accordance with Section 135, Schedule VII of the Companies Act, 2013, and CSR Rules issued by the Ministry of Corporate Affairs on February 27, 2014. Unless the context otherwise requires, the definitions mentioned in the notification dated February 27, 2014, and the Companies Act 2013, shall apply to this CSR Policy.

2. Interpretation

- **“Act”** means the Companies Act, 2013, as applicable to the Company and its CSR obligations.
- **“Rules”** means the Companies (Corporate Social Responsibility Policy) Rules, 2014 and amendments thereto, as notified by the Ministry of Corporate Affairs.
- **“Company”** means Creative Graphics Group, to which this CSR Policy applies.
- **“Board”** means the Board of Directors of the Company.
- **“CSR”** or **“Corporate Social Responsibility”** means the activities undertaken by the Company in accordance with Section 135 and Schedule VII of the Companies Act, 2013 and related rules.
- **“CSR Committee”** means the Corporate Social Responsibility Committee constituted by the Board of Directors under Section 135 of the Act.
- **“CSR Activities / Projects”** means the activities and projects approved by the Board and undertaken by the Company in accordance with Schedule VII of the Act.
- **“Implementing Agencies”** means eligible entities engaged by the Company for execution of CSR projects in accordance with applicable laws and rules.
- **“Ongoing Projects”** means multi-year CSR projects approved by the Board and undertaken in accordance with the Act and the Rules.

3. CSR Vision

Improve community well-being through inclusive, integrated, and sustainable development.

4. Purpose

The Company is committed to identifying and supporting initiatives aimed at promoting inclusive community development, particularly for underprivileged and marginalized sections of society, while also minimizing the environmental impact of its operations.

This Policy serves as a guiding framework approved by the Board, taking into consideration the recommendations of the CSR Committee. It outlines the principles and approach for the selection, implementation, monitoring, and evaluation of CSR activities,

as well as the formulation of the annual action plan.

The CSR Policy shall function as a self-regulatory mechanism to ensure that the Company's CSR initiatives are carried out in compliance with applicable laws, ethical standards, and recognized best practices.

5. CSR Philosophy & Regulatory Framework

5.1 Company Philosophy for CSR Policy

Companies Act, 2013 has formally introduced Corporate Social Responsibility to the Indian Companies. Government of India has given a separate section for CSR along with the legal recognitions to their community development approach.

5.2 Alignment with National CSR Policy

The Company is much positive and appreciates the decision taken by the Government of India. The legal framework of CSR is an edge to corporate Charitable/Reformative approach towards the society around operations. The management of the Company expresses its willingness and support for the CSR concept, and its legal framework and shall abide by it.

6. CSR Governance & Committee Structure

6.1 Corporate Social Responsibility Committee

The Company has constituted a Corporate Social Responsibility Committee (the Committee) comprising the following:

Name of the Director	Designation in the Committee	Nature of Directorship
Mr. Gaurav Arora	Chairman	Non-Executive Director
Mr. Nikhil Rungta	Member	Non-Executive Independent Director
Mr. Puneet Sharma	Member	Non-Executive Independent Director

The Board of Directors of the Company may re-constitute the Committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, and notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The Committee shall exercise powers and perform

the functions assigned to it by the Board of Directors of the Company pursuant to section 135 of the Companies Act, 2013 and CSR Rules notified with regard thereto.

6.2 The responsibilities of the CSR Committee include the following

- To formulate CSR strategy, policy, and goals.
- To monitor the CSR policy and performance.
- To review the CSR projects/initiatives including the amount of expenditure from time to time.
- To formulate and recommend to the Board for its approval, an annual action plan every financial year as per the recommended format of MCA and will review from time to time.
- To ensure legal and regulatory compliance as per CSR guidelines.
- To ensure reporting and communication to stakeholders on CSR projects/initiatives.

7. CSR Activities & Scope

7.1 CSR Activities

Pursuant to Schedule VII of the Companies Act, 2013, the Committee has approved the following activities as “CSR Activities” to be undertaken under the CSR policy of the Company. The Board of Directors has reviewed the said activities and expressed its consent to the Committee to pursue the said activities under the CSR policy of the Company under section 135 of the Companies Act, 2014, Schedule VII and other applicable rules, regulations, notifications, etc., issued/ to be issued from time to time.

7.2 Approved CSR Activities

- Projects related to ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources, and maintaining the quality of soil, air, and water.
- Projects, Activities, and Awareness Programs relating to the conservation of natural resources including renewable energy sources, conserving water, minimizing waste generation, and promoting recycling and reuse.
- Sustainable livelihood Projects focused on empowering marginalized groups to improve livelihood opportunities, thus improving their quality of life.
- Community Health projects to meet special needs. Reaching out with basic health care to all (bridging the gap).
- Environmental Partnerships and Collaborations involving non-profit organizations, government agencies, and local communities to undertake joint environmental initiatives.

- Promoting Gender equality and empowerment of women through partnerships.

7.3 Scope for Additional CSR Activities

This policy will apply to all projects/programs undertaken as part of the Company's CSR activities and will be developed, reviewed, and updated by reference to relevant codes of corporate governance and international standards or best practices. This policy is also in line with Section 135 of Companies Act, 2013 and Companies (CSR) Rules, 2014, as amended from time to time ("the Act").

8. CSR Budget & Unspent Amount

8.1 CSR Budget & Expenditure

The Company shall allocate the budget for CSR activities. The minimum budgeted amount for a financial year shall be 2% of the average net profit of the three immediately preceding financial years. The Company may allocate more funds/ amount than the amount prescribed under section 135 of the Companies Act, 2013, for the CSR activities for any financial year. The CSR Committee shall calculate the total funds for the CSR activities and recommend them to the Board for approval. The Board shall approve the total fund to be utilized for CSR activity for the respective financial year.

CSR expenditure shall include all expenditures including contributions to the corpus for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities which fall within the approved CSR activities.

8.2 Allocation of Unspent Amount

Any surplus generated from CSR activities shall not form part of the business profit of the Bank and shall be treated as follows:

- Ploughed back into the same project.
- Transferred to a designated Unspent CSR Account (UCSRA) and spent in pursuance of CSR policy and Annual Action Plan of the Company.
- Transferred to a Fund specified in Schedule VII, within the prescribed timeline as specified in the CSR Rules.

Any unspent amount shall be reported by the Board in its report specifying the reasons for not spending the amount and shall be dealt with in accordance with Section 135 of the Act and rules under Amendments thereof.

In case, the Bank spends an amount in excess of requirement of its CSR obligations in a financial year, such excess amount may be set off against the requirement of CSR spending up to immediate succeeding three financial years subject to fulfilment of

conditions specified under the Companies (CSR Policy) Amendment Rules, 2021 as maybe amended from time to time.

9. Project Prioritization & Implementation

9.1 Prioritization of activities/ projects

Out of approved CSR activities, the Committee shall decide which activity/ project should be given priority for the respective financial year. While arriving at the decision of the activity to be undertaken for the respective year, the Committee shall analyze the basic needs of the community/ area in which the Organization operates or at the place where its registered office is situated. The Committee shall record its findings and prioritize the CSR activities. While selecting projects and partners, the Committee shall ensure compliance with prevailing CSR Rules and eligibility norms.

9.2 Implementation process

After prioritizing the activity, the Committee shall finalize the detailed implementation project/program, including planning for expenses against the total budget allocated for CSR activities.

At the organizational level for the implementation of the agreed CSR activity, the committee may constitute an implementation team or authorize any of the departments of the Company to organize the implementation of the CSR activity. The team or respective departments shall monitor the implementation process from time to time, on behalf of the CSR committee and place a report to the Committee regarding the progress of the activity implementation, on a quarterly basis. The respective department or implementation team would be responsible for reporting any irregularity to the Committee on an immediate basis.

10. Implementing Agencies

The approved CSR activities, projects and program shall be carried out directly or in any of the following ways as the Board, on the recommendation of the CSR Committee, in its absolute discretion may decide:

- A company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company.
- 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; or any entity established under an Act of Parliament or a State legislature.

- A company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and has an established track record of at least three years in undertaking similar activities.

Any implementing agency engaged by the Company shall be eligible under Rule 4(1) of the Rules, duly registered with the Central Government, and shall possess a valid CSR Registration Number. Such agency shall have the necessary credibility and capability to implement CSR projects effectively. Funds shall be disbursed only after approval of the project proposal, budget, and implementation schedule and may be released in phased installments to ensure proper utilization. In case of collaboration with other companies, the CSR Committee shall ensure separate monitoring and reporting of such projects in accordance with the provisions of the Act and the Rules.

The Company may also undertake CSR projects or activities in collaboration with other corporate. The implementing organization will also be screened, based on the CGSIL screening criteria to ascertain the organization's credibility and its ability to execute the project with utmost effectiveness. In accordance with the Companies (Corporate Social Responsibility Policy) Amendment Rules 2025 (Notification G.S.R. 452(E) dated 07 July 2025) issued by the Ministry of Corporate Affairs, the Company ensures that all implementing agencies engaged for CSR activities are duly registered through the updated web-based e-Form No. CSR-1 on the MCA21 portal. The amended CSR-1 form, which came into effect from 14 July 2025, requires detailed entity disclosures and registrations, and the Company verifies such registration before engaging agencies for CSR projects.

11. Monitoring, Evaluation & Documentation

11.1 Monitoring of CSR projects

All CSR Projects/Activities shall be monitored directly by the Board and the CSR Committee through the CSR Team.

a. Projects directly implemented by CSR Team:

- The CSR Projects taken up by the Company or through other organizations shall be monitored directly by CSR Department. Objectives, implementation plans, key deliverables, and desired impact will be spelt out at the start of the project.
- In case the progress of CSR Projects is not as per the defined milestones, the project will be evaluated by the CSR committee. If the CSR Committee finds that the project is not sustainable or needs modification, it will send its recommendation to the Board for necessary approval with reasonable justification.

b. Projects in collaboration with Implementing Agencies:

- CSR Projects taken up through approved implementing agencies shall be evaluated and monitored jointly by the CSR department and respective organizations. An evaluation format shall be prepared for this purpose at the start of the project clearly stating the time, cost, and deliverables/desired impact.
- In case the progress of CSR Projects is not as per the defined milestones, the project will be evaluated by the CSR committee. If the CSR Committee finds that the project is not sustainable or needs modification, it will send its recommendation to the Board for necessary approval with reasonable justification.

c. Evaluation of Projects:

- Representatives of the Company shall conduct periodic site and field visits to monitor project implementation.
- The Company shall undertake impact assessments through independent agencies, in accordance with the Act and the applicable Rules.

11.2 Reference to documentation and audit trail

Proper documentation, utilization certificates, and impact reports shall be maintained in line with applicable CSR Rules.

In the case of “ongoing projects or programs” yearly implementation, monitoring, and evaluation plan shall be fixed and approved by the Board on the recommendation of the CSR Committee and periodic reports shall be shared with the Board. At the end of every financial year, the CSR Committee shall submit to the Board requisite information and documents to report on the progress of implementation of the CSR projects or programs approved by the Board. Further, the Chief Financial Officer of the Company shall also submit a certificate to the Board certifying that the funds disbursed for CSR projects or activities have been utilized for the said purpose.

12. Compliance and Reporting to Board

The Committee is responsible for undertaking CSR activities as per the approved CSR Policy. Apart from quarterly reporting to the Board about the implementation of CSR activity, a detailed report containing the implementation schedule, the total budget allocated, actual expenses incurred, surplus arising, if any, the result achieved, further work to do in the concern CSR activity, recommendation for the CSR activities for next year, etc. should be placed before the Board for its consideration. The Company also complies with the updated filing requirements under the Companies (Accounts) Rules, including independent filing of Form CSR-2 for annual CSR reporting on the MCA21 portal as prescribed by the Ministry of Corporate Affairs, in line with regulatory amendments relating to CSR reporting timelines.

13. CSR Disclosure

CSR projects approved by the Board and this Policy shall be disclosed on the website of the Company, for public access.

14. Management Commitment

The Board of Directors, Management, and all the employees subscribe to the philosophy of compassionate care. We believe in and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy. Our Corporate Social Responsibility policy conforms to the relevant section of the Corporate Social Responsibility; Rules made under the Companies Act 2013 and amendments(s) to be made thereto in the future.

15. Review of CSR Policy

This CSR Policy shall be reviewed annually and whenever required due to changes in CSR regulations or as deemed appropriate by the Board. Any amendments shall be subject to the Board's review and approval based on the recommendations of the CSR Committee. This Policy is formulated in accordance with the provisions of the Act and the Rules made thereunder. Any changes, notifications, circulars, or clarifications issued by the relevant regulatory authorities, as and when applicable, shall be deemed to form part of this Policy and shall be read in conjunction with it, to ensure compliance with the prevailing applicable laws at the time of implementation.
