



STRIDES PHARMA SCIENCE LIMITED

**CORPORATE SOCIAL RESPONSIBILITY
(CSR) POLICY**

Amended Effective: January 30, 2026

1. PREAMBLE

Strides Pharma Science Limited (“Company” or “Strides”) has developed this Corporate Social Responsibility (“CSR”) Policy (“Policy”) in accordance with Section 135 of the Companies Act, 2013 and rules framed thereunder.

Strides has been an early adopter of CSR initiatives, recognizing that community development programs are integral to its sustainability strategy. Company is committed to going beyond statutory compliance to create long-term, sustainable value for the communities it serves.

Through its CSR initiatives, Strides addresses key socio-economic challenges in the areas of Health and Hygiene, Education, Employability, and Community Welfare.

This Policy reflects our CSR philosophy and provides a structured framework of guidelines and mechanisms for implementing socially beneficial programs aimed at the welfare and sustainable development of society at large.

2. DEFINITIONS

- a) **“Act”** refers to the Companies Act, 2013 read with the relevant Rules framed thereunder and as amended from time to time.
- b) **“Board”** refers to Board of Directors of the Company.
- c) **“Company”** refers to Strides Pharma Science Limited/ Strides.
- d) **“CSR Committee or the Committee”** refers to the Committee constituted by the Board of Directors of the Company in accordance with Section 135 of the Act.
- e) **“CSR Rules”** refers to the Companies (Corporate Social Responsibility Policy) Rules, 2014 and as amended from time to time.
- f) **“Ongoing Project”** refers to a multi-year initiative undertaken by the Company to fulfil its CSR obligations, with a defined timeline not exceeding three years, excluding the financial year in which it commenced.

This also covers projects initially planned for less than one year but subsequently extended beyond one year by the Board for valid and justified reasons.

- g) **“Permissible CSR Activities”** refers to activities listed in Schedule VII of the Companies Act, 2013, and any updates or notifications issued by the Ministry of Corporate Affairs or other statutory / regulatory authorities.
- h) **“Strides Foundation”** is a not-for-profit trust established by the Company’s promoters.

It acts as the CSR implementation agency for the Company.

Strides Foundation is registered with the Ministry of Corporate Affairs under registration number CSR00006315.

Note on Interpretation:

Any words or expressions not specifically defined in this Policy shall carry the meaning assigned to them under the Companies Act, 2013 and the Companies (CSR Policy) Amendment Rules, 2021, along with any subsequent amendments.

In the event of any inconsistency between this Policy and applicable laws or regulations, provisions of the Companies Act, 2013 and its related rules shall prevail.

3. OBJECTIVES OF THE POLICY

- a) Serve as the principal guiding document for Strides CSR initiatives;
- b) Describe core themes and related impact areas as per Schedule VII;
- c) Outline projects and geographies for undertaking CSR initiatives;
- d) Provide framework for selection, implementation, management and monitoring of CSR initiatives.

4. FOCUS AREAS OF ENGAGEMENT

Company will undertake CSR activities permitted under the law, as approved by Board or CSR Committee.

Strides CSR initiatives aim to address key socio-economic challenges in areas of Health & Hygiene, Education, Employability & Livelihood, and Community Welfare.

I	Health and Hygiene
1.	<p>Promote awareness on health and hygiene and provide high-quality preventive, promotive, and curative healthcare services.</p> <p>Operate Arogyadhama, a state-of-the-art primary healthcare centre near Company’s facility in Jigani, Bangalore Rural, offering free consultations and highly subsidized medicines and diagnostic services.</p> <p>Actively participate in Government-sponsored community health programs.</p>
2.	<p>Improve sanitation infrastructure by building underground drainage systems, septic tanks, and similar facilities.</p>
3.	<p>Provide self-sustainable drinking water units to increase accessibility of safe drinking water to communities around us.</p>
II.	Education
4.	<p>Our focus is on enhancing the quality of education and improving learning outcomes by:</p> <ul style="list-style-type: none"> • Increasing student retention and engagement • Developing robust school infrastructure • Ensuring access to relevant and updated learning materials • Empowering and training teachers for effective pedagogy/ teaching • Improving in-school performance of students

	<ul style="list-style-type: none"> Nurturing responsible citizenship through life skills programs, mentoring, and related initiatives <p>To achieve these objectives, we will build schools within stakeholder communities and/ or adopt existing schools and Anganwadis. This includes providing essential infrastructure, amenities including staffing, teacher training, and other necessary support to create a holistic learning environment.</p>
III	Employability/ Livelihood
5.	<p>Our focus is to enhance the employability of youth by conducting Employment Empowerment Programs and offering job-oriented training courses. These initiatives adopt a holistic approach aimed at shaping individuals into responsible citizens.</p> <p>We also strive to empower women through vocational training, enabling them to achieve financial independence and self-sufficiency.</p> <p>In line with these objectives, we will:</p> <ul style="list-style-type: none"> Sponsor students to pursue technical education Develop and support add-on modules to existing academic courses Provide vocational training to youth and women from underprivileged communities
IV	Community Welfare
6.	<p>We are committed to supporting underprivileged communities and extending compassion and care to intellectually challenged individuals and senior citizens by enhancing their access to essential health and nutrition services.</p> <p>In addition, we provide timely assistance to communities affected by natural calamities, pandemics, and other disasters, helping restore lives and livelihoods during times of crisis.</p> <p>Our efforts are focused on promoting sustained well-being and dignity, delivering meaningful relief measures, and supporting rehabilitation and rebuilding initiatives to strengthen resilience and enable long-term recovery for affected communities.</p>

*In addition to the initiatives outlined above, Company may undertake other CSR activities as specified under **Schedule VII of the Companies Act, 2013**, subject to approval by the Board and/ or the CSR Committee.*

5. **ROLE OF CSR COMMITTEE**

The CSR Committee shall:

- Formulate and recommend to Board a CSR Policy, including activities to be undertaken in areas specified under Schedule VII of the Companies Act, 2013;
- Recommend amount of expenditure to be incurred on CSR activities for each financial year;
- Formulate and recommend **Annual Action Plan (AAP)** to Board, which shall include:
 - List of CSR projects or programs approved to be undertaken.
 - Manner of execution of such projects or programs.

- Modalities of fund utilization and implementation schedules.
 - Monitoring and reporting mechanisms.
 - Details of need and impact assessment, if applicable.
- Review and monitor implementation of CSR projects and programs periodically;
 - Ensure that CSR activities are aligned with Company's focus areas and statutory requirements;
 - Evaluate proposals received from Strides Foundation or other implementation agencies and recommend them to Board for approval;
 - Oversee compliance with CSR provisions under the Companies Act, 2013 and CSR Rules, including treatment of unspent amounts and reporting obligations;
 - Place impact assessment reports (where applicable) before Board and ensure they are annexed to the Annual Report on CSR.

6. **ROLE OF BOARD OF DIRECTORS**

Board of Directors shall:

- Approve CSR Policy and ensure its implementation in letter and spirit;
- Approve Annual Action Plan (AAP) recommended by CSR Committee;
- Ensure that Company spends at least 2% of its average net profits of the preceding three financial years on CSR activities;
- Review and monitor CSR activities and ensure compliance with statutory requirements;
- Disclose CSR initiatives, expenditure in Board's Report and on Company's website;
- Ensure that unspent CSR amounts are transferred to appropriate accounts or funds as per the Act and CSR Rules;
- Verify that funds disbursed have been utilized for approved purposes, based on Group CFO certification.

7. **ROLE OF STRIDES FOUNDATION/ IMPLEMENTATION AGENCY**

Strides Foundation shall:

- Act as primary CSR implementation agency for Company;
- Identify, evaluate, and recommend CSR projects aligned with Company's focus areas and Schedule VII of the Act;
- Develop detailed project plans, budgets, and timelines for approved initiatives;
- Execute CSR projects directly or through credible partners, NGOs, or sector experts;
- Maintain proper documentation and records of CSR activities and expenditures;

- Submit periodic progress reports and impact assessments to the CSR Committee;
- Ensure compliance with MCA registration requirements and other statutory obligations;

8. **CSR PROJECTS SELECTION & IMPLEMENTATION**

The Company shall undertake Corporate Social Responsibility (CSR) activities either directly, through Strides Foundation, or via other implementation agencies approved by the CSR Committee.

Proposal Submission

CSR program proposals may be initiated in two ways:

- **Community Requests:** The community can submit proposals to the **Strides Team** or **Strides Foundation**.
- **Company Initiatives:** The Company may proactively identify and propose projects for CSR purposes.

Proposal Evaluation

Strides Foundation shall review all proposals, assess their potential impact, and forward suitable recommendations to the **CSR Committee** for consideration.

Approval Process

The CSR Committee will evaluate and approve projects at its discretion.

Project Execution

Upon approval, Strides Foundation shall implement the projects, either directly or in collaboration with partners, registered trusts, or societies, as deemed necessary.

Monitoring and Reporting

Strides Foundation will monitor project progress and provide periodic reports to the CSR Committee/ Board.

9. **CSR SPEND**

1) **CSR Spend**

Board of Directors shall ensure that in each financial year, Company spends at least 2% of its average net profit from the three immediately preceding financial years towards CSR activities.

Explanation: Net Profit shall be calculated as per Section 198 of the Act.

2) **Surplus arising out of CSR Projects**

In case of any surplus generated from CSR projects, same shall be:

- (i) Reinvested into the same CSR project; or

- (ii) Transferred to Company's Unspent CSR Account and utilized as per CSR Policy and Annual Action Plan; or
- (iii) Transferred to a fund specified in Schedule VII of the Act within the timeline prescribed under CSR Rules.

3) Excess CSR Spend

If Company spends more than its CSR obligation in a financial year, excess amount can be set off against future CSR obligations for up to three succeeding financial years, subject to compliance with CSR Rules.

4) Unspent CSR Amount of Ongoing Projects & Recurring/ Annual Projects

a) Ongoing Projects

Any unspent CSR amount related to ongoing projects shall be transferred to the Company's Unspent CSR Account within 30 days from the end of the financial year.

The amount must be utilized in accordance with the provisions of the Companies Act.

If the amount remains unspent for three consecutive financial years, it shall be transferred to a Schedule VII fund within 30 days after the completion of the third year.

b) Recurring/ Annual Projects

Unspent CSR amounts pertaining to recurring or annual projects shall be transferred to a Schedule VII fund within six months from the end of the financial year.

c) Disclosure Requirement

The Board shall disclose details of unspent CSR amounts and the reasons for non-utilization in its report prepared under Section 134 of the Companies Act.

5) Capital Assets

Company may spend its CSR funds for creation or acquisition of capital assets subject to fulfilment of conditions as specified under provisions of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, as may be amended from time to time.

10. ANNUAL ACTION PLAN (AAP)

CSR Committee shall prepare and recommend an AAP to Board, which shall include:

- a) list of approved CSR projects / programs under Schedule VII of the Act;
- b) manner of execution of such projects / programs as per CSR Rules;
- c) modalities of utilization of funds and implementation schedules for projects / programs;
- d) monitoring and reporting mechanism for projects / programs; and
- e) details of need and impact assessment, if any, for projects undertaken by Company;

Provided that Board may alter such plan at any time during the financial year, as per recommendation of CSR Committee, and reasonable justification.

Board shall ensure that funds are used as approved, with a certification from Group CFO.

11. PROJECT MONITORING AND IMPACT ASSESSMENT

A. Monitoring Process

1. For each CSR project, Company and Strides Foundation will agree on an annual plan and budget.
2. Strides Foundation will implement projects directly or with partners/experts and provide periodic updates to CSR Committee.
3. CSR Committee will review progress and outcomes during its meetings.

B. Impact Assessment

Companies with an average CSR obligation of Rs. 10 crore or more over last three years must conduct an independent impact assessment for CSR projects with an outlay of Rs. 1 crore or more, completed at least one year prior.

Baseline data will be collected before project rollout, and ongoing data will track impact against defined metrics.

Impact assessment reports will be presented to Board and attached to Annual CSR Report.

Costs of impact assessment can be booked as CSR expenditure as per CSR Rules.

12. REPORTING

Company shall report CSR performance in its Annual Report in prescribed format.

13. EMPLOYEE ENGAGEMENT

Company shall:

- Encourage employees to actively participate in CSR initiatives through volunteering programs;
- Organize awareness sessions and workshops to sensitize employees about CSR objectives and impact;
- Facilitate employee involvement in community development projects such as health camps, education drives, and skill development programs;
- Recognize and reward employee contributions to CSR activities through internal communication and appreciation programs;

14. PENAL PROVISIONS UNDER SEBI ACT

- 1) **Non-Compliance** with CSR Spend and Unspent Amount - if Company fails to comply with CSR spending requirements or handling of unspent amounts as per the Act:
 - **For Company:**
 - a) Penalty of twice the amount required to be transferred to the Fund specified in Schedule VII or Unspent CSR Account, OR
 - b) Rs.1 crore, whichever is lower.
 - **For Every Officer in Default:**
 - a) Penalty of 1/10th of the amount required to be transferred to the Fund specified in Schedule VII or Unspent CSR Account, OR
 - b) Rs. 2 lakh, whichever is lower.
- 2) **For any other Non-Compliance/ default** under CSR provisions or related rules, general penalty under Section 450 of the Companies Act will apply.

15. PERIODIC REVIEW OF POLICY

This Policy shall be subject to review as may be necessary and in accordance with any regulatory amendments.
