

**CORPORATE SOCIAL RESPONSIBILITY (“CSR”) POLICY**  
**MAX INDIA LIMITED**  
**(FORMERLY ADVAITA ALLIED HEALTH SERVICES LIMITED)**

**I. PREAMBLE**

Corporate Social Responsibility has been an area of focus for the Max Group since inception. The Companies Act, 2013, brings an even greater emphasis on CSR with Rules that provide guidance on minimum CSR spend, reporting mechanism, review structure and reporting to the shareholders of the Company.

Further to the above stated, the Board has approved this CSR Policy with an objective to outline its CSR focus areas, execution process, review & monitoring mechanism and reporting process to the Management and the Board of Directors of the Company.

**II. PHILOSOPHY & OBJECTIVES**

The Company has its vision to build the most admired company through service excellence and SEWA BHAV. The Company’s mission is to bring about strong social relevance, and aims to be committed to social causes and relevance for its inclusive growth and to contribute to society by supporting causes on the health, education and well being platform.

**III. DEFINITIONS AND INTERPRETATIONS**

“**CSR**” means corporate social responsibility.

“**Companies Act**” shall mean the Indian Companies Act, 2013, along with amendments thereto.

“**CSR Activities**” shall mean the permissible CSR activities as per Schedule VII, as amended from time to time.

“**CSR Committee**” shall mean the CSR Committee of the Board, constituted in accordance with the requirements of Companies Act. In case, the Company is not required to constitute any CSR Committee as per applicable provisions of Companies Act, then Board of Directors of the Company shall exercise all functions of CSR Committee.

“**CSR Rules**” shall mean the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

“**CSR Expenditure**” shall mean the CSR expenditure proposed under this Policy and providing the corpus amount in furtherance of this Policy.

“**Estimated CSR Expenditure**” shall mean the actual estimate of the CSR Expenditure for each year as has been approved for each year.

“**CSR Policy**” shall mean this CSR Policy of the Company.

“**CSR Activities**” shall mean the services rendered in the Company’s CSR Identified Sectors.

“**CSR Identified Sectors**” mean the following sectors, as have been identified under this CSR Policy, (i) Health & Hygiene, (ii) Education, (iii) Nutrition (iv) Livelihood and any other sector as may be identified by the Board from time to time.

“**Max Group**” shall mean the Company, its subsidiaries and other group companies.

“**Max India Foundation**” means the registered not-for-profit Trust, founded by the Company as its Founder / Settlor on January 31, 2002.

“**Primary and Secondary Education**” shall mean the primary and secondary education system, as is recognised in India.

“**Proposed Implementation Plan**” shall mean the annual proposed implementation plan in respect of the Max CSR Activities to be provided each year.

“**Quarter**” shall mean an annual quarter for each Financial Year.

“**Rules**” shall mean the rules prescribed under the Companies Act, as amended from time to time.

“**Schedule VII**” shall mean the schedule VII under the Companies Act.

#### **IV. CSR IDENTIFIED SECTORS AND CSR ACTIVITIES**

The Company shall undertake the CSR Activities in any of the CSR Activities prescribed under the Companies Act, however, it shall give primary importance to the following CSR Identified Sectors:

- **Health & Hygiene**

- a. Supporting and facilitating surgery and high end treatment.
- b. Preventive healthcare to underprivileged in identified geographies
- c. Personal hygiene training in those villages which have been identified by the Company and in those locations where Health and Immunization camps are organized by the Company
- d. Environmental hygiene awareness in and around the areas of operations of the Company

- **Education**

- a. Facilitate and ensure quality education and value based education to primarily underprivileged children
- b. Ensuring inclusive growth of children by supporting credible NGOs and
- c. Organizations with a good track record, to act on its behalf and create a scalable impact in the field of education.

- **Nutrition**

- a. Vitamin (0-5 years), other health supplements and food supplements for underprivileged women and children

- **Livelihood**

- a. Vocational training and creating & supporting Self Help Groups for single women led households in villages identified for adoption by the Company. The vocations for which training will be provided will be identified basis the inherent skill sets and commercial opportunities for those vocations in and around the village

## V. MODALITIES OF EXECUTION AND IMPLEMENTATION SCHEDULES

**Independent Implementing Agency:** The Company shall work with Max India Foundation or any other NGO identified from time to time as its independent implementation partners for execution of Company's CSR Activities

**NGO Support:** Max India Foundation will execute projects with the help of NGOs and employee engagement. Max India Foundation may seek the support of NGOs who are working on ground on issues decided upon. Max India Foundation will also provide training support to volunteers to carry out / support in CSR activities.

**Modality of Execution of Max CSR Activities:** The Company shall execute and undertake the CSR Activities permitted under the Companies Act, 2013

**Geographical Areas for the CSR Activities:** The Company shall execute and undertake the CSR Activities in the areas and locations identified by Max India foundation

**Beneficiaries for the CSR Activities:**

1. Children (0-18 years)
2. Women – Particularly, those who are running households alone
3. Senior citizens
4. Others – society at large

## VI. CSR FUNDING AND CSR EXPENDITURE

**CSR Budget:** In-order to ensure funding for the CSR Activities, the Company shall allocate atleast 2% (two per cent) of the average net profits made by the Company in its immediately preceding three financial years.

**CSR Expenditure Funds:** The CSR Committee will present the Proposed Implementation Plan to the Board, detailing the action steps, modalities and the Estimated CSR Expenditure to the Company, for the Board's approval.

**Implementation Plan.** The Board shall approve the Final Implementation Plan and the CSR Expenditure Funds shall be allocated for implementation by Max India Foundation or any other NGO, as may be decided by the Company.

**Declaration.** The Company hereby declares that any surplus arising and/or additional revenue generated out of CSR Activities undertaken by the Company shall not form part of the business profit of the Company and same shall be spent for undertaking any CSR Activities only.

## VII. Monitoring Process of CSR Activities

**Reporting to CSR Committee.** Max India Foundation and other NGOs, the Company may decide to work with from time to time, shall provide a detailed progress report on the Key Performance Indicators to the CSR Committee every Quarter, or, at such intervals and at such times as the CSR Committee shall require Max India Foundation and other NGOs to do so. The progress on CSR issues selected by the Company will be reported in the Annual Report in the format prescribed by the CSR Rules.

**Reporting to the Board.** The CSR Committee, after approval, shall submit its report giving status of the CSR Activities undertaken, CSR Expenditure incurred and such other details as may be required by the Board, in accordance with applicable laws.

**Key Performance Indicators:** the following shall be the key indicators for assessment of each of the CSR Identified Sectors:

Issues	Key Performance Indicators
<b>Healthcare</b>	
Surgeries and treatments including Cancer	i) No of children benefitted ii) No of women benefitted iii) Total no. of beneficiaries
<b>Preventive Healthcare</b>	
Immunization	i) No. of children covered ii) No. of vaccines administered iii) No. of locations covered
Health Camps	i) No. of beneficiaries ii) No. of locations covered iii) No. of people provided immediate solutions / referred for further treatment.
Personal Hygiene & Environment Hygiene	i) No. of children and adults trained ii) Creation of garbage dumps / cleaning of open drains iii) Reduction / removal of open defecation practices
<b>Education</b>	
Primary & Secondary Education	i) No. of Students impacted ii) No. of Teachers impacted iii) Metrics of progress of teachers
Bridging Digital Divide	i) No. of children enrolled in computer literacy programme. ii) Proficiency in computer knowledge (certification)
Financial Literacy	%age of adults (20-60 years) covered
<b>Nutrition</b>	

Vitamin A	No. of children (0-5 years) given vitamin A capsules.
Other supplements	No. of women and children provided with other supplements
<b>Livelihood</b>	
Vocational training	i) No. of women registered for vocational training ii) Self – sufficient women in year 3 and year 5
Self Help Group	i) No. of Self Help Groups of women created ii) Earnings of Self Help Groups
<b>Miscellaneous</b>	
	i) Any other parameters as the CSR Committee may require

**Board Report and Annual Report.** The Board shall publish this Policy and an annual report on CSR Activities as per applicable laws.

**VIII. Amendment to CSR Policy**

The Board of Directors of the Company is authorized to carry out necessary amendments in this CSR Policy from time to time in pursuance of any amendments made in the applicable laws.