



Policy Title:	INDIA CORPORATE SOCIAL RESPONSIBILITY PROGRAM		
Covered Persons:	Carestream Health India		
Policy Owner:	CSR Committee	Effective Date:	9/1/2022
Policy Type	Finance	Last Revision Date:	15/7/2024

PURPOSE

The Corporate Social Responsibility Policy (“CSR Policy”) has been formulated by the CSR Committee in accordance with the provisions of section 135 of the Companies Act, 2013 (“Act”) and rules made thereunder (“CSR Rules”) and other applicable laws of India.

This policy aims to contribute towards sustainable development of society and the environment to make the planet a better place for future generations. This philosophy is imbibed in our business and social initiatives supporting causes as determined by the CSR Committee. This policy establishes the basic principles and the general framework of action for the management to undertake and fulfil its corporate social responsibility.

SCOPE

This policy applies to Carestream Health India Pvt. Ltd. (“the Company”) and shall be governed by members of the CSR Committee.

POLICY

CSR SPEND

- The Company shall endeavor to achieve the country’s CSR objectives by allocating funds that are
 - a. at a minimum 2% of the average annual Net Profits made during the three immediately preceding fiscal years. ‘Net Profit’ shall be calculated in the manner prescribed by the Act and the CSR Rules.
 - b. spent on projects / activities in accordance with this Policy.
- Administrative overhead expenses incurred by the Company will be used for general management and administration of CSR initiatives but shall not include expenses directly related to the design, implementation, monitoring, and evaluation of a particular CSR project or programme.

- Any surplus funding for a CSR activity shall not form part of the business profit of the Company and shall be ploughed back into the same project or shall be either be a) transferred to the unspent CSR Funding Account to be spent in pursuance of the annual action plan of the Company; or b) transferred to a Fund specified in Schedule VII of Section 135 of the Companies Act 2013, within a period of six months of the expiry of the financial year.

Transfer of unspent CSR amount. - Until a separate fund is specified by the Government, the unspent CSR amount, if any, shall be transferred by the Company to a fund specified in Schedule VII of the Act.

- Capital Asset** - The CSR amount may also be spent by the Company for creation or acquisition of a capital asset, which shall be held by -
 - a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objectives and a CSR Registration Number.
 - Beneficiaries of a CSR project, in the form of self-help groups, collectives, entities; or
 - A public authority

CSR COMMITTEE

The “**CSR Committee**” shall consist of the two directors comprising the Board of Directors (“the Board”):

Director	Directorship	CSR Committee
Mr. Harish Iyer	Executive Director	Chairman
Mr. Nikhel Goel	Executive Director	Member

The CSR Committee will be mainly responsible for:

- Formulating and recommending to the Board, a CSR Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of Section 135 of the Companies Act 2013.
- Recommending the amount of expenditure to be allocated to the specified activities in a financial year.
- Monitoring the Corporate Social Responsibility Policy of the company from time to time.
- Formulating and recommending to the Board, an Annual CSR Action Plan in pursuance of its CSR policy, as well as any justifiable alterations to the plan.
- Presenting to the Board Annual Reports on CSR activities.
- Any other activity necessary to ensure achievement of CSR objectives.

The Committee shall hold meetings as required to discuss various issues stemming from the implementation of this CSR Policy.

BOARD OF DIRECTORS

“The Board” means the collective body of Company Directors appointed under the provisions of the Companies Act, 2013 shall:

- Approve the CSR policy and the annual CSR action plan after considering the recommendations made by the CSR Committee.
- Ensure the Company spends 2% of the average pretax net profits of the Company made during the 3 immediately preceding financial years in pursuance of its CSR Policy.
- Disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.
- Extend a non-ongoing project beyond one year based on reasonable justification.
- Ensure that the CSR activities are undertaken by the Company itself or through a registered and eligible Implementation Agency.
- Monitor disbursed funds have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- Monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- Alter the CSR Annual Action Plan at any time during the financial year, as per the recommendation of its CSR Committee, based on reasonable justification to that effect.
- Ensure administrative overhead shall not exceed five percent of total CSR expenditure of the Company for the financial year.
- Where the Company spends an amount in excess of requirement, such excess amount may be set off by the Board against the requirement to spend up to immediate succeeding three financial years subject to the conditions that –
 - i. the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any.
 - ii. the Board shall pass a resolution to that effect.

CSR PROGRAMMES AND PROJECTS

The Company proposes to adopt one or more CSR activities as prescribed by applicable laws, including Schedule VII of the Companies Act, 2013, as amended from time to time. The CSR activities shall be undertaken within the territory of the Republic of India.

These include:

- 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).
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, daycare centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- 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 set-up by the Central Government for rejuvenation of river Ganga).

- 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 art and handicrafts.
- Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows.
- Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports.
- 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 Govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women.
- 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.
- Rural development projects.
- Slum area development.
- Disaster management, including relief, rehabilitation and reconstruction activities.

The above list is illustrative, but not exhaustive. The CSR Committee may consider and adopt other activities not included in the list but which are in the spirit of the kinds of activities allowed under applicable law for CSR activities.

All expenses and contributions for CSR activities will be made after approval from the Chairman of the CSR committee, which would then be placed before the forthcoming CSR committee for noting and record. The Chairman will ensure that the expenses/contribution will be in full compliance of the CSR Policy.

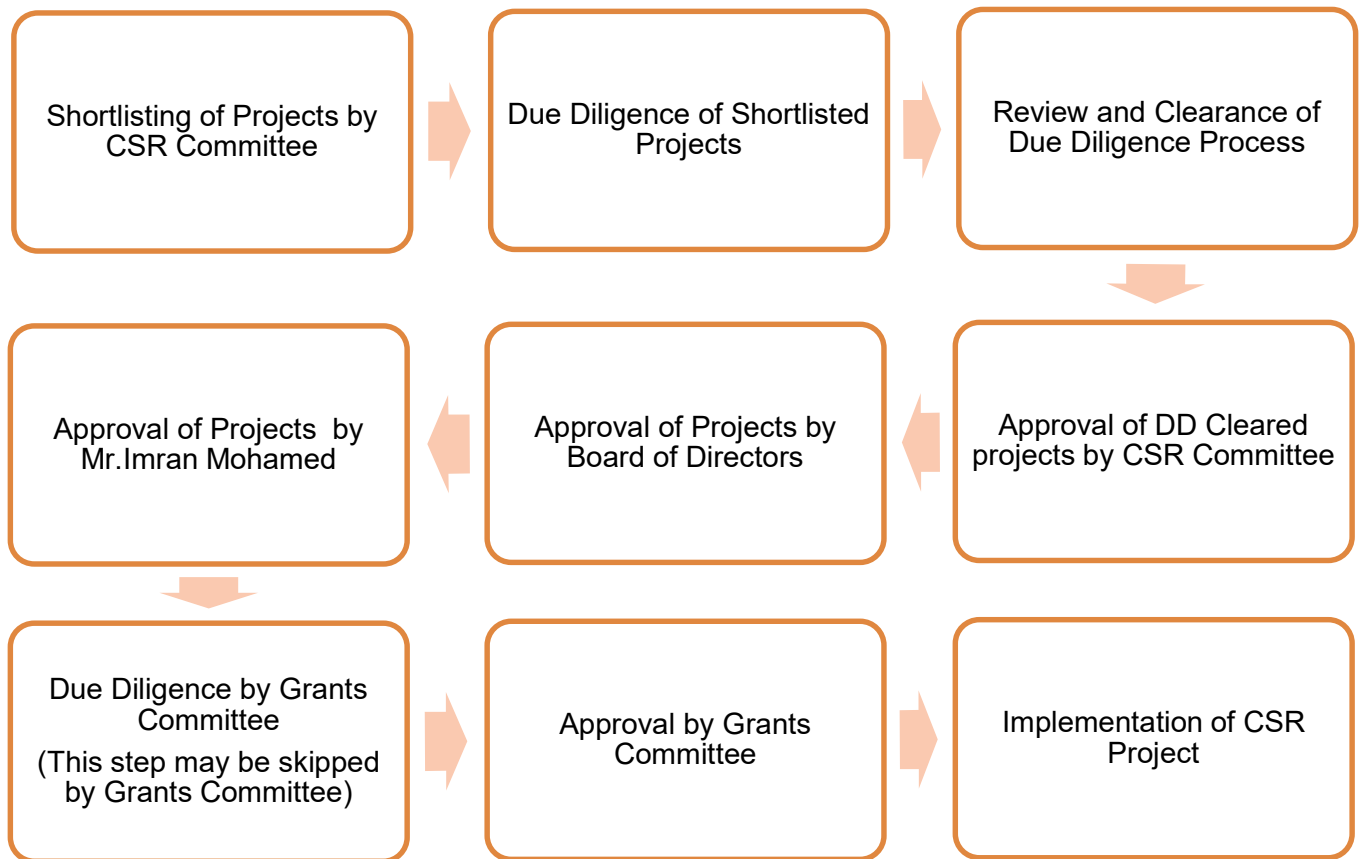
EXCLUSIONS

CSR activities shall not include the following:

- Activities undertaken in pursuance of normal course of business of the Company.
 - Any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level.
 - Contribution of any amount directly or indirectly to any political party.
 - Activities benefitting employees of the Company.
 - Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services.
 - Activities carried out for fulfilment of any other statutory obligations under any law in force in India.
- Activities for any corrupt purpose.

CSR PROJECTS APPROVAL PROCESS

The process in this flow chart is to be strictly complied with for the approval or implementation of any CSR Project



MODE OF IMPLEMENTATION

The Company's CSR projects and programmes may be undertaken by the Company itself or with joint and collaborative efforts of other companies as further defined below.

The CSR projects and programmes may also be implemented through:

- a) 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, established by the company, either singly or along with any other company;
- b) 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;
- c) any entity established under an Act of Parliament or a State legislature; or
- d) 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 having an established track record of at least three years in undertaking similar activities.

The company may also collaborate with other companies for undertaking projects or programmes

or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with these rules.

Company shall further ensure that every entity with whom the company intends to undertake any CSR activity, is registered with the Central Government by filing the form CSR-1 electronically with the Registrar and has obtained a unique CSR Registration Number to that effect.

The CSR Committee may also engage additional local employees to help implement approved activities as needed.

NEED AND IMPACT ASSESSMENT

If the Company has an average CSR obligation of ten crore rupees or more in the three immediately preceding financial years, it shall undertake an impact assessment 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, through an independent agency.

If applicable,

- Details of the need and impact assessment for the projects undertaken by the Company will be included in the Annual Action Plan.
- The impact assessment report shall be placed before the Board and shall be annexed to the annual report on CSR.
- The Impact assessment may be booked as the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed five percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is less.

MONITORING OF CSR PROJECTS

The CSR Committee shall monitor and review the implementation of this policy in accordance with applicable laws annually. The CSR Committee shall amend/ modify/ revise the CSR Policy to align with any changes in law.

The CSR Committee will devise a “transparent monitoring mechanism” for various CSR projects, programs, and activities undertaken by the Company including:

- conduct of impact studies of CSR Projects;
- programs on a periodic basis, through independent third party-agencies when necessary; and
- obtain feedback from various beneficiaries of CSR projects, activities, and programmes undertaken by the Company to measure their benefits.

The Company shall appoint officers at its business places to undertake, supervise and monitor the CSR activities and expenditures. Such officers will be responsible to ensure that the expenditures are made in full compliance with this policy.

CSR initiatives of the Company will be reported in the Annual Report & the Board’s Report in compliance with Section 135 of the Act and rules made thereunder.

AMENDMENTS TO THE CSR POLICY

The Board of Directors of the Company shall have the powers to revise/modify/amend this Policy from time to time, as the Board may think fit, based on the recommendations to be made by the CSR Committee to confirm to the revision/amendment, if any, to be made to the CSR Rules by

the Ministry of Corporate Affairs, under the Act.

RELATED POLICIES AND PROCEDURES

Grants and Charitable Contributions Policy
Grants and Charitable Contributions Procedure
CAP 30-10: Revenue Recognition

VERSION HISTORY

Date	Version	Changes
August 1, 2021	1.0	Date Implemented
July 5, 2022	2.0	Updates to policy based on changes in the law.
July 15, 2024	3.0	Update under CSR Projects Approval Process due to resignation of Mr. Richard Arthur