Reference	EOP/ESG/CSR/01 Version: January 18, 2024
Policy Title	Corporate Social Responsibility Policy ("**CSR Policy**")
Entity	Embassy Office Parks Management Services Private Limited ("**Manager**") in its capacity as manager of the Embassy Office Parks Real Estate Investment Trust ("**Embassy REIT"/ "Trust**")
Responsibility for ensuring Compliance	Compliance Officer

Revision History		
Version #	**Version Date**	**Change Type**
V1	August 16, 2017	Created
V2	August 6, 2018	Amended
V3	July 26, 2023	Amended
V4	January 18, 2024	Amended pursuant to a change in the composition of the CSR Committee

Document Review Cycle			
Effective Date	**Review Schedule**	**Reviewed By**	**Policy Owner**
January 18, 2024	FYQ4 Board Meeting	Board of Directors	Head – Company Secretary & Compliance Officer

Applicability	The CSR Policy is applicable to the Company. The CSR Policy has been developed in consonance with Section 135 of the Companies Act, 2013 and in accordance with the Company (Corporate Social Responsibility Policy) Rules, 2014, as amended ("**CSR Rules**") made thereunder. The CSR Policy shall apply to all corporate social responsibility ("**CSR**") activities undertaken by the Company in India as per Schedule VII to the Companies Act, 2013 ("**CSR Activities**").

Purpose	Embassy REIT's Philosophy: This CSR Policy encompasses the philosophy for social responsibilities and lays down the guidelines and mechanism for undertaking projects, programs and activities beyond business which include initiatives and endeavors for the benefit and development of the community and society. The CSR Policy lays down guidelines for undertaking programs geared towards social welfare activities or initiatives. Through this CSR Policy, we propose to adopt the CSR Activities mentioned below: (a) In alignment with the above vision, the Company through the CSR Activities, will endeavor to enhance value creation in the society and in the community, through its services, conduct and initiatives, so as to promote sustained growth for the society and community, in fulfillment of its role as a socially responsible corporate. (b) The objective of this CSR Policy is to: (i) Outline projects, programs and activities to be undertaken by the Company; (ii) Specify the modalities of execution of such projects, programs and activities; (iii) Monitor the process to be followed for such projects, programs and activities; (iv) Directly or indirectly take up programs that benefit the communities in and around its work centers and results, over a period of time, in enhancing the quality of life and economic well-being of the local populace; and (v) Generate community goodwill for the Company and help reinforce a positive and socially responsible image, through our CSR Activities
Responsibility of the Board of Directors	(a) The Board of Directors of the Company ("**Board**") will be responsible for the constitution of the CSR Committee. The members of the CSR Committee are as follows: (i) Dr. Punita Kumar-Sinha: Independent Director - Chairperson (ii) Mr. Jitendra Virwani: Non-Executive Director (iii) Mr. Aditya Virwani: Non-Executive Director The quorum for a meeting of the CSR Committee would be two members. The meetings shall be held at the registered office of the Company or at

	such place as may be agreed to by the members of the CSR Committee. (b) Changes to the membership of the CSR Committee, and any modification or variation to the powers and the functions of the CSR Committee will require the approval of the Board. (c) The Board shall be responsible for sanctioning the CSR expenditure of the Company ("**CSR Expenditure**") and to ensure that the amount of CSR Expenditure is available for implementing the CSR Policy. (d) Approving the CSR action plan and budget as proposed by the CSR Committee. (e) If the Company fails to spend the amount, reasons for not spending to be specified in the annual report of the Company. (f) The Board shall satisfy itself that the funds disbursed for CSR activities have been utilized for the purposes and in the manner as approved by it. The Chief Financial Officer or the person responsible for financial management will be required to certify it to the effect. (g) In case of an ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and will be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
Responsibility of the Committee	The CSR Committee shall be responsible for monitoring the CSR Policy from time to time. The CSR Committee shall approve and recommend to the Board, the projects or programmes to be undertaken, the modalities of execution and implementation schedule from time to time. Apart from recommending and approving budgets for project implementation, the CSR Committee will also institute a monitoring mechanism to track the progress of each project. The CSR Committee shall report it to the Board. The CSR Committee should be governed by the Companies Act, 2013 and the CSR Regulations, the CSR Rules, regulations etc., by whatever name called. The CSR Committee shall recommend the amount of CSR Expenditure in a year to be spent in accordance with the Companies Act, 2013 and the CSR Rules. For this purpose the Board shall ensure that a designated officer of the Company will provide the relevant finance data and such other necessary details to the CSR Committee. The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of the CSR Policy and such plan shall include relevant details as specified under law from time to time.

CSR Cell	The CSR cell ("**CSR Cell**") will assist the CSR Committee with the implementation and impact assessment of the CSR initiatives. The members of CSR Cell are as follows: i. Chief Executive Officer; ii. Chief Financial Officer; iii. General Counsel; iv. Head - Company Secretary and Compliance Officer; and v. Head - Investor Relations. The CSR Cell shall be responsible for: (a) Identifying CSR Activities at the directions of the Board and the CSR Committee; (b) Undertaking impact assessment of the CSR Activities; (c) Determining the modalities of execution including targets and timelines in consultation with the CSR Committee; (d) Timely implementation of the CSR Activities approved by the Board in compliance with the applicable provisions of the Companies Act, 2013 and CSR Rules; (e) Providing periodic reports to the CSR Committee on implementation as well as assessment carried out through field visits and feedback sessions; and (f) Any other assistance as may be required by the Board and the CSR Committee in relation to implementation of the CSR Activities.

General Responsibilities	(a)	Any surplus arising from CSR projects or programs shall not form part of the company's business profits. Such surplus shall be ploughed back into the same project, transferred to the Unspent CSR Account, or to a Fund specified in Schedule VII of the Companies Act, 2013, ensuring that CSR funds are utilized exclusively for CSR purposes. The Board shall ensure compliance with statutory timelines for unspent CSR amounts. For ongoing projects, the unspent amount must be transferred to the "Unspent CSR Account" within 30 days from the end of the financial year and utilized within three financial years, as per Section 135(6). For non-ongoing projects, any unspent amount shall be transferred to a Fund specified in Schedule VII within six months of the financial year's end, in accordance with Section 135(5).
	(b)	All administrative expenses, including expenditure on wages and salaries, tours and travels, and training and development of personnel deputed on CSR Activities would be borne from CSR funds. However, the expenditure on administrative overheads shall not exceed 5% of total CSR expenditure of the company for the financial year.
	(c)	If it is observed that any CSR Activity taken up for implementation is found not properly implemented, the CSR Committee may, with approval of the Board, may discontinue funding the project at any time during the course of implementation and use such funds for any other project.
	(d)	The CSR Committee shall have the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this CSR Policy.
	(e)	The CSR Committee shall undertake impact assessment, through an independent agency if the thresholds provided under the applicable law are metand the impact assessment reports so prepared shall be placed before the Board and shall be annexed to the annual report on CSR.
Projects, Programmes and Activities	(a)	The Company has identified the following focus areas of intervention: (i) Supplementing and improving the quality of education in government/ government aided/ under-served schools; (ii) Building infrastructure for government/ government aided/ under- served schools; (iii) Healthcare including preventive healthcare facilities; (iv) Sustainable infrastructure for the society; (v) Slum area development and rural development projects; (vi) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior

	citizens and measures for reducing inequalities faced by socially and economically backward groups; (vii) Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare 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; (viii) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation ofnatural 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 the river Ganga; (ix) 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; (x) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports; (xi) Contribution to the Prime Minister's National Relief 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; (xii) In accordance with Schedule VII of the Companies Act, 2013, the Company shall include contributions to public-funded universities; Indian Institutes of Technology (IITs); National Laboratories and autonomous bodies established under the Department of Atomic Energy (DAE), Department of Biotechnology (DBT), Department of Science and Technology (DST), Department of Pharmaceuticals, Ministry of AYUSH, Ministry of Electronics and Information Technology, and other bodies such as Defense Research and Development Organization (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); and (xiii) Measures for the benefit of armed forces veterans, war widows and their dependents.

	(b) The criteria for selecting schools/ areas where the CSR Activities will be carried will, *inter-alia*, comprise of the following: (i) The school should be a government/ government aided/ under-served schools. (ii) Readiness on the part of the school management, local authorities and the community to accept and give their full support. (iii) Healthcare is to be targeted towards the needy individuals. (c) The CSR cell shall make the necessary recommendation to the CSR committee (viz. data collection, survey, quotations and costs involved etc.). For this purpose, the CSR Committee may also approach external consultants for necessary assistance as it may deem fit at such costs as may be approved by the Board. (d) The CSR Cell shall undertake sufficient due diligence of each of the CSR Activity before it is recommended. (e) Based on the recommendations of the CSR Committee, the Board shall approve the following: (i) The specific CSR Activities that should be undertaken from time to time; (ii) The amount of the CSR Expenditure on each of the CSR Activity; (iii) Whether the CSR Activities will be undertaken directly or through an implementing agency or in collaboration with any other entities as specified under law from time to time and record reasons for the same. (f) Activities undertaken in pursuance of the normal course of the Company business shall not be considered towards CSR Expenditure. (g) All CSR projects must be aligned as prescribed in Schedule VII to the Companies Act, 2013. (h) Projects or programmes or activities that benefit only the employees of the Company and their families shall not be considered as CSR. (i) Contribution of any amount directly or indirectly to any political party shall not be considered as CSR.

CSR Expenditure and Allocation	(a)	Tax treatment of CSR spent will be in accordance with Income Tax Act, 1961 as notified by Central Board of Direct Taxes.
	(b)	The Board shall approve the allocation of the CSR Expenditure on the CSR Activities and, to the extent possible, shall give priority to the local areas wherever the Company has its operations.
Implementation	(a)	The Board along with the CSR Committee and the CSR Cell shall be responsible for implementation of this CSR Policy.
	(b)	We may undertake the CSR Activities either ourselves or through other qualifying entities as specified under law from time to time. The projects, programs or activities identified by the CSR Committee and approved by the Board shall be implemented in a project mode through the CSR Cell which will entail charting the stages of execution through planned processes, measurable targets, mobilization and allocation of budgets and prescribed timelines. It also involves assigning of responsibility and accountability. Suitable documents/ agreements shall be entered into with entities for the purposes of implementation of the CSR Activity, in case the CSR Activity is proposed to be implemented through the third party agencies. The conditions of grant of amounts for all CSR Activities and the break-up of the allocations shall be set out and evaluated from time to time.
	(c)	To the extent feasible, a project based accountability approach to stress on the long term sustainability of CSR Activities shall be adopted, and the indicative action plan and implementation schedule (timelines) for the projects, programs and activities shall be adopted.
Monitoring Mechanism	(a)	To ensure effective implementation of the CSR projects, programs and activities undertaken in terms of this CSR Policy, the progress of each such project, programme and activity will be reported to the CSR Committee periodically, with all requisite documentation.
	(b)	An update on CSR implementation shall be submitted to the Board by the CSR Committee, periodically.
	(c)	The CSR Committee will conduct impact studies on a periodic basis, through independent professional third parties/ professional institutions.
	(d)	The CSR Committee shall also try to obtain feedback from the beneficiaries of the CSR projects, programs and activities. If considered necessary, the Company may procure the evaluation of the effectiveness of the various programs/ activities undertaken under the CSR Policy through external agencies for providing the required feedback and inputs to formulate and improve the programs in future.
Impact Assessment	(a)	Regular and interactive feedback sessions shall be conducted at all levels including with other entities through which CSR Activities are being undertaken as well as the respective beneficiaries of all the CSR

	Activities undertaken by the Company. (b) Field visits shall be conducted at regular intervals to ensure effective implementation. (c) Proper documentation shall be done in a Management Information System ("**MIS**") format to record key observations of such feedback sessions and field- visits. If deemed necessary by the CSR Committee, the effectiveness of the various programs/ activities undertaken under the CSR Policy may be evaluated through external agencies and reports shall be prepared pursuant to such evaluation.
Record Keeping	(a) The CSR Committee shall maintain proper minutes of all its meetings. (b) The CSR Committee shall prepare an annual report on CSR with such information and particulars as may be required under law and such report shall be included in the Board's report annexed to the financial statements. (c) The annual report of the Company shall include an annual report on CSR containing such details as may be prescribed from time to time under law. (d) The Board will be responsible to ensure that the statutory requirements as may be prescribed from time to time under law are complied with.
Amendments	The CSR Committee is empowered to amend or modify the CSR Policy and such changes shall be placed before the Board for its approval. The Board may subject to compliance with applicable law, at any time approve or alter, amend or modify the CSR Policy, as it deems fit to comply with the statutory obligation to undertake the CSR Activities.