

THRIVENI SAINIK MINING PRIVATE LIMITED

CIN: U74900HR2015PTC057396

Project Office C/o: NTPC Ltd., Langatu, PO: Barkagaon,

Dist.: Hazaribag-825311, Jharkhand, India

Mobile No. +91 73199 42626, E mail: csoffice@thrivenisainik.com



Corporate Social Responsibility Policy (“CSR Policy”)

1. Preface

- a) This Corporate Social Responsibility (CSR) Policy of **M/s. Thriveni Sainik Mining Private Limited** (“the Company” or “TSMPL”) has been formulated in accordance with the provisions of Section 135 of the Companies Act, 2013 (the “Act”) and the Companies (Corporate Social Responsibility Policy) Rules, 2014, including any statutory amendments or modifications thereof.
- b) The policy outlines the Company’s commitment to operate in an economically, socially and environmentally sustainable manner, while recognizing the interests of all its stakeholders. It serves as a guiding document to direct the Company’s CSR initiatives and ensure compliance with legal requirements.
- c) At TSMPL, we believe in contributing actively to the social and economic development of the communities we serve. We aim to build a sustainable future for the marginalized and underprivileged sections of society, thereby improving the Human Development Index (HDI) of our nation.
- d) Being a responsible corporate citizen is integral to our ethos. We recognize that business growth and social progress must go hand in hand, and the benefits of our success must reach the communities around us.

2. Definitions

- a) “Act”: Companies Act, 2013 including its amendments.
- b) “Activities”: CSR activities undertaken by the Company under this Policy.
- c) “Board”: Board of Directors of the Company.
- d) “Company”: Thriveni Sainik Mining Private Limited.
- e) “Committee”: Corporate Social Responsibility Committee constituted by the Board under Section 135 of the Act.

3. Objectives of the Policy

a) Primary Objectives

The primary objectives of this CSR Policy are to:

- i. Empower marginalized communities through education, healthcare, and sustainable livelihood opportunities.
- ii. Support inclusive development that aligns with the national development agenda and Sustainable Development Goals (SDGs).
- iii. Promote holistic development by addressing key areas such as education, health, sanitation, environmental sustainability, and rural infrastructure.

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b) Key focus areas:

- i. Health and sanitation (with emphasis on women and children)
- ii. Provision of clean drinking water
- iii. Education support for children and students
- iv. Livelihood and vocational training
- v. Promotion of sports
- vi. Construction of borewells, ponds, and water supply infrastructure
- vii. Medical care through Company-run facilities
- viii. Infrastructure development including roads
- ix. Conservation of flora and fauna
- x. Reduction of child mortality and maternal health improvement
- xi. Youth skill development and leadership training
- xii. Hunger and poverty eradication
- xiii. Other activities as permitted under Schedule VII of the Companies Act, 2013.

4. CSR Activities

CSR activities shall be undertaken as per the provisions of Schedule VII of the Companies Act, 2013. The Company may engage in any of the following (but not limited to) activities:

a) Health & Sanitation

- i. Preventive and curative healthcare
- ii. Sanitation and hygiene initiatives
- iii. Safe drinking water supply
- iv. Contribution to Swachh Bharat Kosh.

b) Education & Skill Development

- i. Primary and higher education support
- ii. Scholarships and digital learning
- iii. Vocational training, particularly for women and youth
- iv. Special education for differently-abled individuals
- v. Skill development of local community through Center of Excellence of TSMPL registered with Skill Council for Mining Sector (SCMS)
- vi. Security training to local youth in the Thriveni Sainik Industrial Security Academy (TISA).

c) Women Empowerment & Equality

- i. Gender equality programs
- ii. Support for women's hostels and old-age homes
- iii. Economic empowerment of backward communities.

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d) Environment & Sustainability

- i. Conservation of biodiversity
- ii. Afforestation and agroforestry
- iii. Water and soil conservation.

e) Culture & Heritage

- i. Restoration of heritage sites
- ii. Promotion of local arts and handicrafts
- iii. Setting up public libraries.

f) Sports & National Development

- i. Promotion of rural and national sports
- ii. Support for Olympic and Paralympic sports
- iii. Contributions to PM CARES or National Relief Funds.

g) Research & Innovation

- i. Funding R&D in science, medicine, and technology
- ii. Support to government research bodies such as DRDO, ICMR, CSIR, IITs, Mecons, etc.

h) Rural and Urban Development

- i. Infrastructure development in villages
- ii. Slum area redevelopment
- iii. Disaster relief and rehabilitation.

5. Prohibited CSR Activities

In accordance with Rule 2(1)(d) of the CSR Rules, the following shall **not be considered as CSR expenditure**:

- a) Activities undertaken outside India, except for training of Indian sports personnel representing any state or union territory at national or international level.
- b) Activities benefiting only employees of the Company and their families.
- c) Contributions to political parties under Section 182 of the Companies Act, 2013.
- d) Activities undertaken in the normal course of business (except in special cases allowed under law).

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6. Corporate Social Responsibility Committee

a) Constitution :

The Board has constituted the CSR Committee with the following members:

- 1) Mr. Balasubramanian Karthikeyan - Chairman
- 2) Mr. Kuldeep Singh Solanki - Member
- 3) Mr. Siddharth Jain - Member
- 4) Mr. Sanjay Kumar Khator - Member.

b) Responsibilities :

- 1) The Committee shall be responsible for reviewing and modifying this CSR Policy from time to time.
- 2) The Committee shall evaluate and approve the CSR Projects placed before it for implementation in line with the Companies Act, 2013.
- 3) The Committee shall monitor the progress of each of the CSR Projects approved by it on regular basis and shall give suitable directions for effective implementation.
- 4) The CSR Committee shall arrange for conducting Impact assessment of each CSR Project internally or by third-party agencies to ensure transparency and effectiveness.
- 5) The Committee shall report the status of CSR Project implementation on a quarterly basis to the Board of Directors.

7. Mode of Implementation

- 1) TSMPL may implement the CSR activities directly on its own or through any implementing agency.
- 2) The annual budgetary allocation shall be approved by the Board upon recommendation of the CSR Committee, which shall not be less than the CSR expenditure to be incurred as per Section 135 of the Companies Act, 2013.
- 3) The Board may approve additional voluntary contributions towards CSR.
- 4) Allocation will be determined annually based on need, availability of funds and CSR Committee's recommendations.
- 5) Utilization of funds shall be monitored to ensure alignment with objectives under Clause 3 and activities under Clause 4.

8. Reporting and Disclosure

- 1) CSR Policy and the composition of the CSR Committee shall be disclosed in the Board's Report.
- 2) The CSR Policy shall be uploaded on the Company's website: www.thrivenisainik.com
- 3) Annual disclosures shall comply with Rule 8 of the CSR Rules and applicable SEBI regulations (if applicable).

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9. Policy Review and Amendments

This CSR Policy shall be reviewed from time to time by the CSR Committee and recommended to the Board for approval. Any changes in the applicable legal provisions shall be incorporated appropriately in the policy.

For Thriveni Sainik Mining Pvt. Ltd

(Balasubramanian Karthikeyan)

Director

DIN: 01428395

(Sanjay Kumar Khator)

Director

DIN: 10049373

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