CORPORATE SOCIAL RESPONSIBILITY POLICY

I. BACKGROUND & APPLICABILITY

Medi Assist Insurance TPA Private Limited (hereinafter referred to as "Medi Assist" or "the Company") recognizes that its responsibility extends beyond business operations to the community and the environment in which it operates. As a pivotal leader in the Third Party Administrator space, the Company is committed to leveraging its resources to drive meaningful social impact, foster equitable health outcomes, and contribute to sustainable community development.

This policy has been institutionalized in accordance with Section 135 of the Companies Act, 2013 (the "Act"), read alongside the Companies (Corporate Social Responsibility Policy) Rules, 2014, and all subsequent legislative modifications, notifications, and circulars issued by the Ministry of Corporate Affairs (MCA). It outlines the structural framework, execution modalities, and monitoring mechanisms for the Company's social initiatives, ensuring a continuing commitment to behave ethically, drive inclusive economic growth, and foster sustainable livelihoods.

This Policy applies to all the Corporate Social Responsibility ("CSR") projects proposed to be undertaken by the Company in accordance with Schedule VII of the Companies Act, 2013, focusing primarily on healthcare, wellness, education, and skill development.

II. COMPANY'S VISION ON CSR

To drive inclusive, sustainable social transformation by empowering communities, fostering equitable development, and behaving as a responsible corporate citizen. Medi Assist is committed to leveraging its corporate strength to create measurable, long-term impact that enhances the quality of life for underserved populations across society. It constantly endeavours to actively contribute to the social and economic development of the communities in which it operates taking into consideration the interest of all its stakeholders namely Policyholders, Insurers, Employers, Provider Networks, Aggregators, and Shareholders.

III. CSR POLICY & KEY FOCUS

The Company shall undertake any one or more activities which fall within the provisions of Schedule VII of the Act. The Company shall spend at least 2% of the average net profits of the Company made during the three immediately preceding financial years towards such CSR Activities.

KEY FOCUS AREAS FOR CSR ACTIVITIES / PROJECTS:

1) Healthcare

Medi Assist will directly or with support of agencies focus on facilitating and improving the delivery and accessibility of health and hospital services. These will include strengthening health seeking behavior among low income and vulnerable communities, adoption of wellness and preventive healthcare including matters relating to advancing women's health.

2) Education

Enabling access to quality primary, secondary, and vocational education for marginalized sections of society. Interventions may focus on:

- Supporting programs that equip students with the tools to transition into higher education or job-oriented streams.
- Focusing on the educational empowerment of underprivileged girls.
- Supporting capacity-building programs, with a particular focus on public health and insurance awareness.

3) **Skill development and sustainable livelihoods**

Enhancing the employability of youth and promoting socio-economic sustainability. Interventions may focus on:

- Supporting technical and vocational training programs that improve the livelihoods of lower-income communities.
- Engaging with initiatives that foster entrepreneurial growth and micro-enterprise development.

4) **Support employee engagement in CSR activities**

Facilitating platforms that allow the Company's employees to actively participate, volunteer, and contribute to the Company's approved CSR initiatives across various geographies.

IV. CORPORATE SOCIAL RESPONSIBILITY (CSR) COMMITTEE

In terms of the provisions of Section 135(1) of the Act, the Board of Directors of the Company shall constitute/ re-constitute the CSR Committee from time to time in compliance with statutory requirements. The CSR Committee shall comprise of a minimum of three directors, at least one of whom, shall be an independent Director.

V. IMPLEMENTATION, MONITORING & REPORTING

1) **Implementation and monitoring of the CSR activities:**

CSR COMMITTEE (BOARD LEVEL COMMITTEE):

a) The CSR Committee at Board level shall be constituted/ re-constituted in compliance with the provisions of section 135 of the Act. The said Committee may constitute or delegate powers to a Sub-Committee for identifying and spending towards CSR activities.
b) The Committee shall oversee the operations of the Sub-Committee and shall also recommend to the Board the amount of expenditure to be incurred on CSR activities.
c) As may be required, the CSR Committee may appoint external specialists in the CSR arena to review the progress of the CSR projects/programs.
d) In case of projects / programs being undertaken through other organizations, execution of Memorandum of Understanding ("MoU") with such entities, which shall inter-alia specify the key roles and responsibilities of each of the parties.
e) Where, in the immediately preceding financial year, the Company has an average CSR obligation of Rs. 10 Crore or more, the Company shall undertake an impact assessment, through an independent agency, of its CSR projects having outlays of Rs. 1 crore or more which have been completed not less than one year before undertaking the impact study, in accordance with Rule 8(3) of the Companies (Corporate Social Responsibility Policy) Rules, 2014. Further, subscriptions to Zero Coupon Zero Principal (ZCZP) Instruments ('ZCZP instruments') shall be exempt from the requirement of undertaking an independent impact assessment.

CSR SUB-COMMITTEE:

a) The Committee may consist of a minimum of 3 (three) members, as may be decided by the CSR Committee and at least one of whom, shall be the Chief Executive Officer/one Director. The Sub Committee shall identify the projects for CSR activities, estimate the amount of expenditure, oversee the implementation of the CSR activity and report to the CSR Committee periodically for its approval/ratification.

b) CSR Sub-Committee shall formulate an Annual Action Plan, and place the same before the CSR Committee for its consideration and review.

The CSR Sub-Committee shall, at least twice in a year, update the CSR Committee details of each project inter alia including following points:

- Budgeted expenditure of the Projects
- Actual Expenses of the Projects ("YTD")
- Status of the Projects
- Timelines for completion of the Project, if any
- Outcomes of inspections carried on the Projects, if any
- Any other details of relevance

2) Reporting of the CSR activities and website disclosure:

a) The CSR Committee shall report to the Board of Directors of the Company the status of the CSR projects/activities undertaken by the Company, the amount spent thereon and the impact on the targeted beneficiaries/society at large, at least on a yearly basis.

b) The details of the CSR activities carried out by the Company during a financial year shall be disclosed in the Boards' Report section of the Annual Report.

c) The Company shall post the following information on its website:

- The Board-approved CSR Policy.
- The composition of the CSR Committee.
- Details of the CSR activities as disclosed in the Board's Report section of the Annual Report.

3) Chief Financial Officer Reporting:

The Chief Financial Officer ("CFO") or the person responsible for financial management shall issue a certificate to the Board certifying that the funds disbursed are utilized for the purpose and in the manner as approved by the Board.

VI. APPROACH – EXECUTION OF CSR PROJECTS

The Company shall carry out CSR activities only in India. The Company may carry out CSR activities either on its own or through a registered public trust or registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 or company established by the Company or its holding company under Section 8 of the Act or as may be approved by the CSR Committee.

VII. ANNUAL ACTION PLAN (AAP)

The Annual Action Plan shall include the following:

a) The list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act.

b) The manner of execution of such projects or programs either directly or through implementing agencies.

c) The modalities of utilization of funds and implementation schedules for the projects or programs.

d) Monitoring and reporting mechanism for the projects or programs, and

e) Details of need and impact assessment, if applicable, for the projects undertaken by the Company.

The Company shall undertake the CSR activities during each financial year in accordance with the approved Annual Action Plan.

VIII. CSR BUDGET

a) The Board of Directors of the Company shall ensure that a minimum of 2% of average net profit before taxes of the immediately preceding 3 (three) financial years is spent on CSR initiatives undertaken by the Company. The Board shall approve the Annual Action Plan and approve allocated CSR budget.
b) All expenditure towards the programs shall be diligently documented
c) Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same/similar program and spent in pursuance of CSR Policy and annual action plan of the Company
d) Where the Company spends an amount in excess of its CSR obligation for a financial year, such excess amount may, subject to a resolution of the Committee/ Board and be set off against the CSR expenditure required to be made in the immediately succeeding 3 financial years.
e) The Company may in addition to the key focus areas as mentioned in Section III of the policy may deploy CSR funds by subscribing to ZCZP Instruments issued by Not-for-Profit Organizations (NPOs) registered on the Social Stock Exchange segment of recognized Stock Exchanges. Expenditure incurred through ZCZP instruments shall not exceed 10% of the total CSR expenditure of the Company for that financial year.
f) Unspent CSR Amount: Where any amount allocated for an ongoing CSR project remains unspent at the end of a financial year, such unspent amount shall be transferred by the Company, within 30 days from the end of the financial year, to a special account to be opened in accordance with Section 135(6) of the Act, titled the "Unspent Corporate Social Responsibility Account", and shall thereafter be spent by the Company towards such project within 3 financial years from the date of such transfer, failing which the Company shall transfer the unspent amount to a Fund specified in Schedule VII of the Act within 30 days from the expiry of such third financial year. Where the unspent amount does not pertain to any ongoing project, the same shall be transferred by the Company to a Fund specified in Schedule VII of the Act within 6 months of the expiry of the relevant financial year, in accordance with Section 135(5) of the Act.

IX. POLICY REVIEW & FUTURE AMENDMENT

The CSR Committee may review this CSR Policy, shall make suitable changes to this CSR Policy as may be required, and shall submit the same for the approval of the Board.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions in this Policy and this Policy shall stand amended accordingly.

Version Control:

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