**Corporate Social Responsibility Policy (with effect from 9th March 2022)** Amended basis CSR Rules notified by the Government *[the Ministry of Corporate Affairs (‘MCA’) vide its notification dated January 22, 2021 has amended the provisions of the Companies (Corporate Social Responsibility Policy) Rules, 2014]*.

# Corning Philosophy

At Corning, corporate social responsibility is a proactive commitment to preserve the trust of our stakeholders. The commitment contributes to sustainable economic and environmental development through all our business activities – how we operate, what we sell, how we give, and how we support our people, the communities in which we operate, and society at large.

Corporate social responsibility is intrinsic to Corning’s heritage and it is integral to how we build value and trust in our company. It is also a demonstration of how we live our values which represent the unchanging moral and ethical compass that guides everything we do. Our collective belief in these Values – and in the behavior that goes along with them – continues to guide all of our decisions as a company. As a result, our employees, shareholders, suppliers, and customers can take pride in associating with the Corning.

# Objective & Scope

* 1. The CSR activities shall be undertaken by the Company as per this policy by way of projects or programs or activities (either new or ongoing) in India only, excluding the activities undertaken in pursuance of the normal course of business. The Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities.
  2. The calculation of CSR expenditure shall not include: a) any expenditure on an item that to the best of our knowledge is not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act; b) CSR projects or programs or activities that benefit only the employees of the Company and their families,; c) contribution of any amount directly or indirectly to any political party under section 182 of the Act; d) The surplus, if any arising out of the CSR projects or programs or activities shall not form part of the business profits of the company;

e) activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services; f) Activities carried out for fulfilment of any other statutory obligations under any law in force in India.

* 1. The following are some examples of the CSR activities that could be included:
     1. eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation, including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
     2. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
     3. 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;
     4. 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;
     5. 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:
     6. 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;
     7. training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
     8. 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 Government for socio-economic development and relief and welfare of the scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
     9. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defense Research and Development Organization (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);
     10. Rural Development Projects;
     11. Slum Area Development;
     12. Disaster management, including relief, rehabilitation and reconstruction activities.

These thrust areas are mapped with the activities as suggested in the schedule VII of the Companies Act

# Governance (CSR Committee)

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR shall be appointed by the Board of Directors of the Company which must consist of at least three or more Directors.

The current members of the company’s CSR Committee are:

|  |  |  |
| --- | --- | --- |
| **Name** | **Designation** | **Role in CSR Committee** |
| **Sudhir N Pillai** | Managing Director | Member |
| **Bhawna Singhal** | Whole-time Director | Member |
| **Subhajit Das** | Whole-time Director | Member |

The committee to meet at least once a year to review the implementation of CSR projects/ programs and give suitable direction.

# Powers of the Board

1. The Board to monitor and review the performance and impact of the CSR programmes, to provide input and course corrections if required and satisfies itself that the CSR funds so disbursed are aligned to the CSR Policy of the Company and have been utilized for the purposes and in the manner as approved by it.
2. The CFO or the person responsible for financial management shall certify to the fact that CSR funds so disbursed have been utilized for the purposes and in the manner approved by the Board.

# Powers of the Committee

1. To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as permissible under the provisions of the Companies Act 2013 and the rules made thereunder;
2. To recommend the annual CSR expenditure Budget to the Board for approval
3. To monitor the Corporate Social Responsibility Policy of the company from time to time.
4. To formulate and recommend to the Board an annual action plan as per the provisions of the Act;
5. To Recommend any alteration in the annual action plan at any time during the year and update, if any, required to the CSR Policy;
6. To Implement and monitoring the CSR activities as per the annual action plan;
7. To identify projects of the Company as ‘Ongoing Projects’ as per the provisions of the Act and recommend the same to the Board;
8. To undertake Impact assessment through third parties for CSR projects whenever applicable and
9. To ensure implementation of CSR activities of the Company within the applicable framework.

# Amount of expenditure

* 1. The Board shall ensure that the Company spends, in every financial year, at least 2% of average net profits of the Company made during the three immediately preceding financial years, in pursuance of this CSR Policy. If the Company spends any amount over and above such 2% of average net profits, the same is to be considered as excess CSR expenditure which can be set-off in the immediate succeeding three financial years subject to the conditions as prescribed under the Act.
  2. The Board shall ensure that administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.
  3. All expenditure towards the programs to be diligently documented

# Implementation Strategy

* 1. Engagement Model:
     1. **Direct Engagement**: The Company will conceptualize and execute the initiatives directly through in-house employees within the overall regulatory framework of applicable rules; as well as those of their implementing agencies through institutions with a track record of at least three financial years, and any other criterions which the CSR committee, may deem fit.
     2. **Partnerships**: In addition to direct engagement, in specific cases, to partner with other organizations for undertaking projects/programmes/activities in such a manner that the CSR Committees of respective companies are in a position to report separately on such projects or programs in accordance with the Act and Rules made thereunder.
     3. The Company may undertake the CSR projects/programmes/activities in identified areas, through a registered trust or a registered society, as per the provisions of the Act and Rules, framed thereunder.
  2. The following summarizes the core model of engagement:
     1. Direct engagement with the communities through a team of trained professionals
     2. Focus on local needs, community ownership and long term sustainability
     3. Outcome and impact orientation
     4. Creating demonstrable models of development for replication

# Monitoring Mechanism

* 1. Impact Assessment – In the event of average CSR obligation of Rs. 10 crores or more in the three immediately preceding financial years, the Company shall ensure that impact assessment through an independent agency is carried out for CSR projects having an outlay of Rs. 1 crore or more. Expenditure incurred for such assessment shall not exceed 5% of the total CSR expenditure for the financial year or 50 lakh rupees, whichever is less.
  2. CSR Policy implementation shall be periodically reviewed and monitored by Governance Structure comprising CSR Committee of the Board, and by the Board of Directors from time to time.
  3. If the Company fails to spend such amount, the Board shall, in its report specify the reasons for not spending the amount.

# Annual Action Plan

* 1. The Company shall prepare an Annual Action plan of the Company to identify the activities and the CSR expenditure to be spent during the year which shall include the details as mentioned in the rules.
  2. The action plan shall be simple, action oriented, measurable, relevant and time bound.
  3. The Board may alter the Annual Action Plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

# DISCLOSURES

A brief summary of CSR Policy/projects/programmes/activities will also be included in the Annual Report in the prescribed format as per the CSR rules of the Act and the same shall be displayed on the Company’s website, if any.

# POLICY REVIEW & FUTURE AMENDMENT

The Committee shall annually review its CSR Policy from time to time and make suitable changes as may be required and submit the same for the approval of the Board.