

VEDANTA LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

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Company	Vedanta Limited
Recommended By	Corporate Social Responsibility Committee (CSR Committee)
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VEDANTA LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. POLICY OBJECTIVE

Vedanta Limited ("VEDL" or "the Company") is committed to conducting its business in a socially responsible, ethical, and environmentally sustainable manner. The Company seeks to continuously enhance the quality of life of communities in and around its operational areas—past and present—and beyond, in alignment with India's development priorities and the United Nations Sustainable Development Goals (UN SDGs). This Policy provides the framework to achieve these objectives and ensures a consistent, transparent, and compliant approach to CSR implementation.

This Policy is framed pursuant to Section 135 of the Companies Act, 2013 read with the Companies (CSR Policy) Rules, 2014 and shall be interpreted accordingly.

2. VEDANTA'S CSR PHILOSOPHY

Vedanta Limited is committed to invest in the social development of communities and the nation at large.

CSR VISION

"Empowering communities, transforming lives and facilitating nation building through sustainable and inclusive growth."

We believe that

- We contribute positively & meaningfully to the integrated and inclusive development of the country, through partnerships with National and State Governments, as well as local, national and international partners;
- The long-term sustainability of our businesses is intrinsically linked to enduring, mutually beneficial relationships with our stakeholders, particularly the communities we engage with;
- Beyond government collaboration, forging partnerships with corporates and civil societies, community-based institutions, and
- Our employees play a vital role in strengthening and building resilient communities in addition to driving business success.

3. THEMATIC FOCUS AREAS

The programs are based on the CSR Strategy 2030 and are designed to promote intergenerational mobility out of poverty, socio-economic growth, and the empowerment of individuals. They align with national development priorities and global goals, supported by independent baseline and needs assessments.

The major thrust areas are:

- a) Children's Well-being & Education
- b) Women's Empowerment
- c) Health Care
- d) Water & Sanitation
- e) Sustainable Agriculture & Animal Welfare

- f) Market-linked Skilling
- g) Environmental Protection & Restoration
- h) Sports & Culture
- i) Development of Community Infrastructure
- j) Participation in programs of national importance including disaster mitigation, relief, rehabilitation.

The CSR activities detailed in the Annexure (Titled Key Areas for CSR Activities) are aligned with Schedule VII of the Companies Act, 2013. The CSR Committee and the Board shall periodically review the rationale for continuation of projects in specific geographies and record the same in the minutes of meetings.

Activities undertaken in the normal course of business, political contributions, sponsorships for marketing benefits, activities benefiting only employees and their families, and activities undertaken outside India (except as permitted) shall not be considered as CSR.

In the event of any restructuring, such as a merger or demerger, the Board may, at its discretion, continue or phase out ongoing CSR projects in the erstwhile local areas of operation, with a view to achieving the intended impact of such projects.

4. GUIDING PRINCIPLES FOR PROJECT SELECTION AND IMPLEMENTATION

The CSR projects shall be identified in line with CSR Strategy 2030 and based on recommendations from the independent need assessment and baseline surveys conducted once in every three years.

Vedanta Limited, may implement CSR programmes through following models:

a) Partnerships: CSR activities may be undertaken through collaborations with:

- NGOs, trusts, societies, Section 8 companies, multilateral or international agencies, educational or training institutions, industry associations, or other corporates;
- entities established by the Central or State Government; or
- entities established under an Act of Parliament or a State Legislature

Implementing agencies (other than Government – established entities) shall be registered under applicable provisions of Income-tax Act and should possess an established track record of at least three years in similar activities and fulfill the other conditions prescribed under the applicable laws.

b) Direct Engagement: In-House implementation by Vedanta Limited and/or through foundations established for this purpose, encompassing project design and delivery.

5. GOVERNANCE, REVIEW AND MONITORING

Vedanta Limited aligns its CSR processes with Vedanta Technical standards across the project life cycle. A multi-tiered governance mechanism ensures systemic review of the projects and timely course correction, as required. This includes:

- Periodic internal reviews by CSR teams covering project approvals, partner onboarding, budget monitoring, audit reviews, statutory compliances, and outcome evaluation;
- Review and approval of Annual CSR plans and budgets by the CSR Executive Committee and Management Committee (CSR Exco & Mancom) with quarterly monitoring of program progress;
- Oversight by the CSR Committee which shall meet at least twice a year to approve the Annual CSR plan, the budget and review the program progress.
- The Board of Directors shall satisfy itself that the CSR funds are utilized for the approved purposes and in the prescribed manner. The Chief Financial Officer or the person responsible for financial management shall certify utilisation of CSR funds.

Surplus arising from CSR activities shall not form part of the business profits of the company and shall be utilized strictly as per applicable law.

Unspent CSR amounts, after adjustment of any excess expenditure of previous financial years, shall be classified as relating to ongoing or non-ongoing projects and transferred to the designated Unspent CSR account or specified fund as per the legal requirements.

CSR expenditure incurred in excess of the prescribed 2% obligation may be carried forward and set off against the CSR obligation of up to three immediately succeeding financial years, in accordance with the law.

Capital assets created or acquired through CSR shall be held by eligible entities or beneficiaries as prescribed under the law and shall not be owned by Vedanta Limited.

Administrative overheads shall not exceed 5% of the total CSR expenditure of the Company in any financial year.

6. FORMULATION OF ANNUAL ACTION PLAN

The CSR Committee shall formulate and recommend to the Board an **Annual Action Plan**, based on CSR Strategy 2030 and need assessments and baseline surveys, outlining:

- (i) CSR projects to be undertaken
- (ii) modalities of execution and implementation schedule
- (iii) utilization of funds
- (iv) monitoring and reporting mechanism for the projects and
- (v) impact assessment requirements, if any.

The Board may modify the Annual action plan during the financial year on recommendation of the CSR Committee.

7. IMPACT ASSESSMENT OF PROJECTS/PROGRAM

Vedanta Limited shall undertake the impact assessment wherever applicable as per the requirements below under Companies Act, 2013:

Every Company having average CSR obligation of ₹ 10 Crore or more in pursuance of Section 135(5) of Companies Act, 2013, in three immediately preceding financial years, shall undertake impact assessment, through an Independent Agency, of their CSR projects having outlays of ₹ 1 Crore or

more, and which have been completed not less than 1 year before undertaking the impact study.

Additionally, the Company shall undertake periodic impact assessments of other projects, once every three years.

8. AUDIT

All CSR activities and related expenditures shall be subject to audit by an independent external Agency/Firm.

The CSR Committee of the Company shall review the compliance with the applicable provisions under Companies Act, 2013 and rules made thereunder, including any amendments

9. COMMUNICATION

The company shall voluntarily and periodically communicate the outcomes and impact of the social programs to relevant stakeholders.

The CSR Policy, composition of the CSR Committee, and approved CSR projects shall be disclosed on the Company's website in the prescribed manner

10. RESPONSIBILITY

The Board-constituted CSR Committee, supported by the CSR team, shall be responsible for decision-making and oversight with respect to the Company's CSR Policy and its implementation.

11. REVIEW OF POLICY

The CSR Policy shall be reviewed once every three years or earlier, as may be recommended by the CSR Committee.

12. AMENDMENTS IN LAW

Any subsequent amendment or modification to the Companies Act, 2013 and/or other applicable laws relating to CSR shall automatically apply to this Policy.

Annexure I – Key Areas for CSR Activities at Vedanta Limited

Thematic Areas and Project/ program List

1. Children’s Wellbeing & Education

- Early childhood care and development initiatives, including programs such as **Nand Ghar** and other childcare projects, encompassing the establishment and strengthening of Model Anganwadis.
- School education initiatives, including **Shiksha Sambal, Shala Pravesh Mohotsav, Mo School, Project Ujjwal, Prerna, FACOR Sathi Shiksha Amrut Pariyojna, Company-run schools, Vidyagraha, Gyan Jyoti, Project Connect, Project Vidya, Mini Science Centre, Khel Vikas** and other education interventions aimed at improving learning outcomes, creating safe and inclusive learning environments, and providing scholarships and financial assistance to meritorious students in earmarked schools across communities.
- Initiatives to prepare and support students for higher education in disciplines such as engineering, medicine, and postgraduate studies through programs like **Unchi Udaan, Utkarsh Scholarships, Reengus, Bhoremdev Vidya Pit** and other similar interventions, enabling students to pursue academic excellence and contribute to nation-building.
- Digital literacy and ICT-based initiatives, including the **Vedanta Computer Literacy Programme** and other pre-vocational training programs, aimed at introducing technology and digital skills to young learners.

2. Community Infrastructure and Mobilization

- Integrated rural development and model village initiatives, including programs such as **Gram Nirman, Sanrachna and Village Development Centres**, and other similar projects focused on holistic community development through creation and strengthening of infrastructure such as roads, bridges, culverts, drainage systems, rural electrification, water supply and recharge structures, community centres, and education, health, water, and other essential rural infrastructure.

3. Healthcare

- Healthcare initiatives, including programs such as **Arogya, Nikshay Mitra, Vedanta Hospital, District Satellite Hospital, Maa Santoshi Jan Kalyan Hospital, Mobile Health Van’s** and other similar interventions, aimed at improving access to quality healthcare in identified communities through mobile health units, medical camps, telemedicine services, and support to hospitals and healthcare facilities.
- Nutrition-focused interventions designed to address malnutrition and improve overall community health outcomes, particularly among vulnerable populations.
- Programs promoting menstrual hygiene and nutrition among adolescent girls and women through awareness creation, implementation of targeted interventions, and large-scale dissemination.
- Programs like **Pheli Udaan** promoting menstrual hygiene and nutrition among adolescent girls and women through awareness creation, implementation of targeted interventions, and large-scale dissemination.

4. Disaster Management

- Disaster management initiatives encompassing preparedness, prevention, relief, rescue, rehabilitation, and safety response during natural and man-made calamities.

5. Water & Sanitation

- Sanitation and safe drinking water initiatives, including programs such as **Swachhta, Tamira Surabhi, Nirmal** and other similar interventions, with a focus on the restoration, rejuvenation, and sustainable management of traditional community water resources.

6. Women Empowerment

- Capacity-building initiatives such as **Sakhi, Subhalaxmi, Unnati** and other similar programs aimed at enhancing livelihoods and improving the overall well-being of rural women.
- Promotion of women-led rural and peri-urban micro-enterprises, including initiatives such as **Subhalaxmi Cooperative, Project TARA, Sakhi Utpadan Samiti, Jivika**, and other women-led collectives and enterprises.

7. Sports

- Sports development initiatives, including football and archery programs such as **Vedanta Football Schools, Archery Academy, Vedanta Zinc Football & Sports Foundation, Martial Arts Training Center, Sampark, Lakshya-Ved** and other similar projects aimed at nurturing sporting talent.
- Cluster-based sports promotion initiatives in identified communities, including the creation and strengthening of sports infrastructure.

8. Art and Culture

- Initiatives like **Vedkala, Adikala** focused on the preservation and promotion of culture, including tribal, regional, and indigenous cultural heritage.

9. Livelihood

- Livelihood enhancement programs such as **Barmer Unnati, Sathi Pragati, Samadhan, Project Haryali, Vedgram, Sangam, Mor Jal Mor Mati, Vedamrit** and similar initiatives aimed at strengthening agriculture, livestock, and water resource development in rural communities.

10. Skill Development

- Initiatives focused on skilling, upskilling, and reskilling of youth through institutions such as **Vedanta Skill School, Sesa Technical School, Zinc Kaushal, Sesa Skillin, Cairn Centre of Excellence, Vedakshata** and other market-linked vocational, technical, and professional training interventions.

11. Animal Welfare

- Initiatives aimed at promoting animal welfare and biodiversity conservation, including partnerships with **The Animal Care Organizations (TACO)** and similar programs dedicated to the protection, rehabilitation, and conservation of flora and fauna across different regions.