



Aster DM Healthcare Limited

Global Corporate Social Responsibility Policy

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1. Introduction and Approach

Aster DM Healthcare extends primary cares services through its wide network of neighbourhood clinics and pharmacies, secondary to quaternary care, through its various hospitals, medical education through its medical colleges and academy and community beneficial programmes through various sustainable CSR initiatives, well supported by its multi-tire brands “Aster”, “Medcare” and “Access”.

Corporate Social Responsibility (CSR) is not considered to be just a statutory requirement for the organisation, but the logical extension of its core values. Aster Volunteers was established in 2016 as the CSR arm of Aster DM Healthcare. Aster Volunteers was founded with the aim of serving as a catalyst for social impact action and to function as a platform for all those who wish to contribute to its humanitarian efforts. Operating under a two-fold approach, Aster Volunteers encourages members from its internal group entities to personally take up and see through as many initiatives as possible to give back to society. On the other hand, we are working to build a combined volunteer force consisting of Aster employees and members of the public, who are willing to utilise their time and energy to make a meaningful impact in society. While different group CSR entities have been working with specific mandates for the past 20 years, these diverse vertical initiatives have now been consolidated under the larger umbrella of Aster Volunteers. Some of these group foundations have existed almost as long as the group itself. Serving many specialised functions, each of them has been enriching the lives of millions.

2. Context and Scope

India

All CSR Activities and programs conducted in India will adhere to the legal framework provided by Section 135 and Schedule VIII of the Companies Act, 2013, read with the Companies (Corporate Social Responsibility Policy) Rules 2014 as amended from time to time.

Outside India

CSR activities and programs conducted outside India will be selected based on the needs of the local communities as per the Company vision and strengths. The respective geographies will comply with local CSR regulatory compliances, if any. The Company may take up other CSR activities as may be appropriate from time to time, in accordance with the recommendation of the CSR Committee and approval of the Board.

3. Vision

Aster Volunteers endeavors to create a platform that empowers communities to drive the spirit of volunteerism through social impact interventions in healthcare, environment, education and social uplifting through sustainable practices.

4. Mission

To drive initiatives that create a positive impact through internal and external volunteer engagements and successful collaborations.

5. Objectives

- The Company will undertake social projects in designated communities, in a focused manner to generate maximum positive impact;
- The Company is committed to all its stakeholders to conduct business in a socially and environmentally sustainable manner that is transparent and ethical;
- Develop and implement community enablement programmes for sustainable socio-economic development;
- The Company is part of a bigger ecosystem of people, values, organizations, nature and environment, and the company understands that it is its social responsibility to give back to the world.

6. Focus Areas & Programs

India

The Company may undertake the following activities, projects or programs towards CSR in India:

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care 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;
- ii. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- iii. promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- iv. 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;
- v. rural development and slum area development projects;
- vi. disaster management, including relief, rehabilitation and reconstruction activities;
- vii. any other activities or subjects specified in Schedule VII of the Companies Act, 2013 (the Act) and the rules made thereunder, as amended from time to time and circulars/notifications issued by statutory authorities.

Outside India

The Company may take up any CSR activities in regions outside India as may be appropriate from time to time, in accordance with the recommendation of the CSR Committee and the approval of the Board.

The list of programs conducted by Aster from time to time shall be enclosed as **Annexure I**

7. Governance structure

a. Board of Directors

India

The roles and responsibilities of the Board with respect to CSR activities in India are as follows:

- The Board shall after taking into account the recommendations made by the CSR Committee:
 - i. approve the CSR Policy for the company,
 - ii. disclose contents of such Policy in its report and
 - iii. place it on the company's website
- Ensure that the activities as are included in the CSR Policy of the company are undertaken by the company;
- The Board shall ensure that the company spends, in every financial year, at least 2% of the average net profits of the company made during the 3 immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy;
- If the company fails to spend such amount, the Board shall, in its annual report, specify the reasons for not spending the amount, unless the unspent amount relates to any ongoing project, and transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year;
- In case of ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible period.

Outside India

The Board shall approve CSR Annual Budget for CSR activities outside India based on recommendation of CSR Committee.

B. CSR Committee

India

The role and responsibilities of CSR Committee of the Board for CSR activities in India are as follows:

- Formulate and recommend to the Board a CSR Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Act but not limited to the Projects and Programs specified therein;
- Formulate and recommend to the Board, an annual CSR plan in pursuance of its CSR policy, which shall include the following, namely;
 - the list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - the manner of execution of such projects or programs, whether by itself, implementation agencies or through collaborations;
 - the modalities of utilization of funds and implementation schedules for the projects or programs;
 - monitoring and reporting mechanism for the projects or programs; and
 - details of need and impact assessment, if any, for the projects undertaken by the company;
- The Committee may recommend collaborating with other companies for undertaking CSR activities.

Outside India

- The Committee shall recommend a separate Annual Budget for CSR activities outside India to the Board;
- The CSR committee shall monitor the execution, implementation, and utilization of funds every six months.

8. Selection and Implementation

- At the first Board meeting of every financial year, the CSR Committee shall recommend for the approval of the Board of Directors of the Company, an annual CSR Action Plan (CSR Plan) delineating the CSR activities to be carried out during the financial year, including the budgets thereof, their manner of execution, implementation schedules, modalities of utilisation of funds, and monitoring & reporting mechanism for the CSR Programmes. The Board will consider and approve the CSR Plan with

such modification that may be deemed necessary; the CSR Plan may also be modified by the Board during the financial year, on the recommendation of the CSR Committee;

- The Company shall undertake and implement CSR activities either directly or through a registered public trust, registered society or a section 8 company under the Companies Act, 2013, (NGOs), institutions and /or such other agencies ('implementing agencies') as may be specified in Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time;
- The Company may also engage international organisations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR policy or also collaborate with other companies for undertaking projects or programmes or CSR activities in accordance with the provisions of the Act and the rules made thereunder.

9. Monitoring and Reporting

- Once every six months, the CSR team will provide a report back to the CSR Committee on the progress of implementation of the approved CSR Programmes carried out during the six-month period, covering details of achievement against planned deliverables for each programme;
- The aforesaid report will also include confirmation from the Chief Financial Officer that the funds disbursed for the CSR Programmes are being utilised for the stated purpose and in the specified manner;
- The CSR Committee will review the report back stated above and keep the Board apprised, once every six months, on the status of implementation of the CSR Programmes;
- The Company shall undertake impact assessment of the CSR activities undertaken by the Company through an independent agency:
 - the average CSR obligation of the Company, in the 3 immediately preceding financial years is Rs. 10 crores or more;
 - The activity or the CSR project has an outlay of Rs. 1 crore or more;

Considering company's performance and its net profit crosses the threshold, Committee shall appoint independent agency to complete impact assessment;

- At the end of every financial year, the CSR Committee will consider an Annual Report on CSR activities and recommend the same for the approval of the Board. The said Report will be disclosed as part of Annual Report of the company;

10. CSR Expenditure

- The Board shall ensure that the administrative overheads shall not exceed 5% percent of total CSR expenditure of the company for the financial year. Administrative Expenses means expenses incurred by the company for 'general management and administration' of CSR functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular CSR project or program;
- 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 project or shall be transferred to the Unspent CSR Account and spent in pursuance of the CSR policy and the CSR Plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year;
- In case the company spends an amount more than the CSR budget, such excess amount may be set off against the requirement to spend up to immediate succeeding three financial years subject to the conditions that –
 - i. the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any.
 - ii. the Board of the company shall pass a resolution to that effect.
- The CSR amount may be spent by a company for creation or acquisition of a capital asset, which shall be held by –
 - i. a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and having CSR Registration Number.
 - ii. beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
 - iii. a public authority;

Unspent Amount

Ongoing Projects

- Any amount remaining unspent pursuant to any ongoing project, shall be transferred by the company within a period of thirty days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the "Unspent Corporate Social Responsibility Account";
- Such amount shall be spent by the company in pursuance of its obligation towards the CSR Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

Other Projects

if the company fails to spend the CSR budget of the year, the Board shall, in its report, specify the reasons for not spending the amount and, unless the unspent amount relates to any ongoing project, transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. Until a fund is specified in Schedule VII for the purpose of transfer of unspent amounts, the unspent CSR amount if any, shall be transferred by the company to any fund included in Schedule VII of the Act.

11. Limitation and Amendment

In the event of any conflict between the provisions of this Policy and of the Companies Act, 2013 (Act) or SEBI Regulations or any other statutory enactments, rules, the provisions of such Act or SEBI Regulations or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the SEBI Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.

Annexure-I

The following are the strategic pillars of various programmes, in which the activities are made.

a) Aster Volunteers Health & Safety Awareness Programmes (AV H&S):

- The Company conducts regular Community Health & Safety, wellbeing Programmes for developing a healthier society;
- The Company conducts various health awareness drives for social causes like Quit Tobacco, BLS Awareness Programmes, Cancer Awareness & Screenings, Health Pledge Campaign, Road Safety & Accident Prevention Campaigns, Health Awareness Activities for Prevention of Lifestyle Diseases & Seasonal Diseases, Health Awareness Programme in Media, Regular Free Medical Screenings Camps, Blood Donation Drives etc.

b) Aster Volunteers Mobile Medical Services (AV MMS):

- Mobile Medical Units have been introduced into service to provide primary medical care to people living in remote areas or in areas with compromised living conditions in India, the UAE and Philippines where medical facilities are inadequate or non-existent or people living in compromised living conditions;
- The Mobile Units offer services of doctors and paramedics;
- Free of charge medicines are also provided when required in the Mobile Units;
- Regular visits are conducted by these units to hilly areas in the North-Eastern State of Jharkhand in India, housing areas of labourers in the UAE, less privileged communities in Metro Manila in Philippines and remote villages in Kozhikode, Kerala and Tribal Villages of Odisha India;
- The Company is initiating more Mobile Healthcare Units in wider geographies of India and GCC, thus ensuring healthcare accessible to all.

c) Aster Volunteers Community Dialysis Centres (AV CDCs):

- The Company established a first of its kind “Standalone Community Dialysis Centre” in the state of Kerala. The focus is on improving quality of life of kidney patients, who cannot afford the recurring treatment or surgical expenses and need regular haemo-dialysis for survival;
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Similar facilities were established across the state either directly by Dr. Moopen, Founder Chairman & Managing Director or by like-minded people with the support of Dr. Moopen. These centres receive technical support of Aster MIMS Super Specialty Hospital, Calicut.

d) Aster Volunteers Early Diseases Detection & Cancer Screening Programme (AV EDDCs):

- The Company has established a number of Early Diseases Detection and Cancer Screening Centers(EDDCs) in association with Aster DM Foundation and other NGO's;
- The centers receive technical and medical support from Aster DM Healthcare's facilities in Kerala, such as Aster Medcity, Kochi and Aster MIMS, Calicut;
- The centers work to create awareness among people about cancer and the need for early detection by providing comprehensive check-up;
- All the services are provided free for the economically marginalised people or at a highly subsidized rate;
- The Company conducts regular cancer awareness and structured cancer screening programs;
- Treatment subsidies are provided for patients requiring secondary/tertiary care if they belong to marginalized communities or Free for BPL (Below Poverty Line) members, through various schemes;

e) Aster Volunteers Paediatric Cardiac Surgeries - "Save Little Hearts":

Children born with heart anomalies are treated and their heart condition corrected through timely detection and surgery. The Company intervenes with the objective of providing the best care that modern medicine can provide to children, regardless of ethnicity, nationality, or financial status.

f) Aster Volunteers Treatment Aid (AVTA):

- The Company provides financial support worth crores of rupees every year to patients, who cannot afford the cost for advanced treatment, including complex surgeries;
- An efficient and effective system is in place for assessing and extending subsidies and support to eligible patients for treatment at the Company's facilities in India;
- Patients, who are found to be in need of financial supports, are assessed by a predefined criterion and then provided treatment free of cost;

g) Aster Volunteers Disaster Management Supports (AV DMS):

The Emergency Departments of the hospitals of the Company have a dedicated disaster management team to provide immediate healthcare support to the victims of natural calamities and disasters.

h) Aster Volunteers Village Adoption (Healthcare & Social Empowerment):

- Healthcare Village Adoptions Model implemented very successfully in Kerala at Karadu by Aster MIMS Charitable Trust, in association with Aster MIMS, Calicut, and has received appreciation from the Health Ministry of Government of Kerala;

- Dr. Moopen's Family Foundation has established Moopen's Institute for Local Empowerment (MILES) as a role model Village Adoption Project in his native village Kalapakanchery in North Kerala;
- MILES conducts regular activities for education and socio-empowerment, which is a great impetus for the village folks to aim for a higher standard of life.

i) Aster Volunteers Support to Differently Abled & Special Needs Schools:

- The Foundation runs a Special Needs School in Northern Kerala at Kalapakanchery in Malappuram which helps creating great awareness among the people of the need to provide special care for differently abled children;
- Funds are raised through internal sources of the Chairman and his family;
- Provisions for Differentially abled people, including well-being activities and providing employment opportunities are in place in the organizational strategy and in the ongoing activities of the Company's Volunteer programme.

j) Aster Volunteers NGO Aids & Partnership Programmes:

The Company supports selected NGO's through financial contribution to support the wellbeing of the society. NGOs working in the healthcare, education, and socio- developmental activities are getting support through Aster DM Foundation or DM Family Foundation.

k) Aster Volunteers Community Connect Programmes:

The company supports various community connect programme under the Aster Volunteers. A, B, C, baskets engaging the internal and external Volunteers and the operational units in the regions and its supporting foundation/trusts or strategic partners.

While the above strategies shall drive the focus of Aster Volunteers CSR activities, the key focus of the programme shall be around the Major 6 Pillars of Activities that shall be monitored and measured periodically to understand the impact of the same to the society and make a change.

1. Aster Volunteers Mobile Medical Services
2. Aster Volunteers BLS Awareness Training Programme
3. Aster Volunteers Treatment Aid
4. Aster Volunteers Support to the Differentially Abled
5. Aster Volunteers Medical Camps & Community Connect Programmes
6. Aster Volunteers Aid for Disaster or Int'l Community, through NGOs.
