INNEFU LABS LIMITED
(Formerly known as Innefu Labs Private Limited)

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Version: 2.0
Approved By: Board of Directors
Approved on & Effective From: 09.07.2026

1. BACKGROUND

Corporate Social Responsibility ("CSR") is a concept whereby corporate entities integrate social and environmental concerns in their business operations and in their interaction with stakeholders on a voluntary basis. A business enterprise cannot be oblivious to societal and environmental development. The corporate entities are empowered and possess great potential to significantly influence the surroundings in which it operates. The main purpose of an entity must be beyond creating wealth i.e., towards attaining sustainable development and to create stakeholder value. CSR is the continuing commitment by the Company to behave ethically and contribute to economic development while improving the quality of life of the workforce and their families as well as of the local community and the society at large.

2. OUR CSR VISION

In this era of Globalization, liberalization and advances in communication technology, there is an alarming increase in the awareness of the CSR throughout the World. We firmly believe that if we want a better, safer, cleaner and healthy environment then we must take the first step to begin our journey towards striking a balance between the societal needs, economic development and eco-friendly environment through various CSR activities.

Every individual has the Right to Life, Right to live with dignity, Right to education, Right to clean and healthy environment which are engraved in the Constitution of India. The responsibility is cast upon the Government to ensure that these Rights are protected and are not exploited. We realize that this responsibility must be shared by each and every individual, especially by corporate entities to eradicate hunger, poverty, upliftment of the downtrodden society, provide education and protect the environment. We will strive to emerge as one of the best Corporate Citizens.

3. DEFINITION AND INTERPRETATION

1. **"Board"** means the Board of Directors of the Company.
2. **"Company"** means Innefu Labs Limited (formerly known as Innefu Labs Private Limited).
3. **"CSR Activities"** means such programs and projects as may be approved by the Board in terms of this CSR Policy.
4. **"CSR Committee"** means a committee constituted by the Board of Directors in terms of Section 135 of the Companies Act, 2013 (Act) and the CSR Rules.
5. **"CSR Rules"** means the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

6. **"CSR Expenditure"** means the amount recommended by the CSR Committee to be incurred on the CSR Activities in India in terms of the Act and the CSR Rules as approved by the Board from time to time.
7. **"Director"** means a member of the Board of the Company.
8. **"Net Profits"** means the net profit of the Company as per its financial statement prepared in accordance with the provisions of the Section 198 of the Act, but shall not include (i) any profit arising from any overseas branch or branches of the Company (whether operated as a separate Company or otherwise); and (ii) any dividend received from other Companies in India, which are covered under and complying with the provisions of Section 135 of the Act.
9. **"Society"** means a society registered under the Societies Registration Act, 1860 or any other applicable law in India.
10. **"Trust"** means a public charitable trust registered under the Indian Trusts Act, 1882 or any other applicable law in India.

Any term used but not defined above, shall have the same meaning assigned to it under the Act or the CSR Rules.

4. CSR ACTIVITIES

1. The Company may undertake social projects in designated communities, in a focused manner, for maximum positive impact.

2. In consultation with the local community, the Company may design and effectively implement projects in areas such as healthcare, community development, education and skills development.

3. Make quality healthcare accessible and affordable for the underprivileged either directly or through designated intermediary vehicle.

4. Develop and implement the education, water and sanitation, infrastructure development and elderly care projects for sustainable socio-economic development in the designated communities.

5. Develop the skills of the youth by setting up educational institutions, improving infrastructure of the existing institutes, providing schools for students and promoting research in the educational services sector.

6. To contribute towards the creation of an enterprise culture in our society.

7. As a responsible corporate citizen, the Company is committed to sustainable development and inclusive growth and considers social responsibility as an integral

part of its business activities and endeavors to utilize allocable CSR budget for the benefit of the society. In terms of the CSR rules, Circular(s), Notification(s), as amended from time to time, issued by the Ministry of Corporate Affairs (MCA), the Company will be focusing on undertaking any of the project /programs /activities listed below, as specified in Schedule VII to the Act excluding activities undertaken in pursuance of normal course of business of a Company and other activities as defined in Rule 2(1)(d) of the CSR Rules and clause 8(5) of this Policy:

i. Eradicating hunger, poverty and mal-nutrition, 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 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 centers 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, and 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" setup by the Central Government for rejuvenation of river Ganga;

v. 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;

vi. 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;

vii. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;

viii. Contribution to 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 Schedule Tribes, other backward classes, minorities and women;

ix. a. Contributions or funds provided to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government;

b. public funded Universities Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);

x. Rural development projects.

xi. Slum area development.

Explanation — For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

xii. disaster management, including relief, rehabilitation and reconstruction activities.

8. The CSR Activities will be carried out in a manner that the preference is to undertake the CSR Activities in and around the local areas where the Company operates.

9. The above areas as enshrined in Schedule VII of the Act and included in this policy aim to provide macro areas in which CSR projects should be undertaken by the Company. Based on the scope of activities stated above, the CSR Committee shall provide recommendations to the Board with respect to specific CSR Activities that may be undertaken by the Company.

10. The Board shall ensure that appropriate designated staff or personnel provide adequate assistance (viz. data collection, survey, quotations and costs involved etc.)

to the CSR Committee to enable it to make necessary recommendations to the Board. For this purpose, the CSR Committee may also approach external consultants for necessary assistance as it may deem fit at such costs as may be approved by the Board.

11. The CSR Committee should consider details of CSR projects as elaborated in the annual action plan for each financial year.

12. The following details of any CSR Activities to be undertaken by the Company shall be presented to the Board by the CSR Committee along with its recommendations, being part of the Annual Action Plan:

    (i) The list of CSR projects or programmes to be undertaken in areas or subjects specified in Schedule VII of the Act;
    (ii) The objectives and expected results of the CSR Activity;
    (iii) The relevant sector and the nature of the CSR Activity;
    (iv) The focus area/ location for implementation of the CSR Activity;
    (v) The modalities of utilization of funds and amount to be allocated towards the CSR Activity;
    (vi) The implementation schedules for the projects or programmes with indicative timelines for completion of the CSR Activity;
    (vii) The manner of execution - whether the CSR Activity should be undertaken by the Company itself, or through Implementation Group or any Implementing Agency or in collaboration with any other Company as per Rule 4 of the CSR Rules;
    (viii) Monitoring and reporting mechanism;
    (ix) details of need and impact assessment, if any, for the projects undertaken by the Company; and
    (x) Such other details as it may deem necessary.

    The Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

13. In case any of the CSR Activities to be undertaken are anticipated to be long term i.e. an ongoing project being multi-year project undertaken by a Company in fulfilment of its CSR obligation of a term up to 3 (three) years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification, then a detailed estimate on implementation schedule or milestones should be submitted by the CSR Committee to the Board to monitor the implementation of the project with reference to the

approved timelines and year-wise allocation and to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

14. If the Board has approved a project and subsequently Board realizes that the project and spending is going to be extended to next financial year, the same project again shall be required to be approved by the Board as a multi-year/ on-going project with some reasonable justification.

15. Based on the recommendations of the CSR Committee, the Board shall approve the CSR activities of the Company for a given financial year.

5. COMPOSITION OF THE CSR COMMITTEE

The composition of the CSR Committee of the Board is as under:

S. No.	Name	Designation/Category	CSR Committee
1.	Sh. Abhishek Sharma	Whole-time Director	Chairperson
2.	Smt. Anju Gupta	Independent Director	Member
3.	Sh. Tirender Wig	Whole-time Director	Member
4.	Sh. Priyank Jain	Nominee -Non Executive Director	Member

The Board shall have the power to make any change(s) in the constitition of the Committee.

6. IMPLEMENTATION OF THE CSR POLICY

1. The Board shall be responsible for implementing the mandate of the CSR Policy and shall ensure that the CSR Activities are carried out in accordance with the CSR Policy read with the Act and CSR Rules and the annual action plan formulated and recommended by the CSR Committee.

2. The CSR Committee shall approve reconstitution of an implementation group for the purposes of implementation of the CSR Activities approved by the Board from time to time (the "Implementation Group") and submitting report of the progress on the CSR Activities to the CSR Committee, which shall be further laid before the Board.

3. Mode of Implementation: The CSR Activities may be undertaken by the Company directly with the prior approval of the Board, or through any of the following

entities as “Implementation Agency” being duly registered with the Central Government and having a unique CSR Registration Number:

(i) Company established under section 8 of the Companies Act 2013, or Trust, or Society registered under section 12-A and 80-G of the Income Tax Act 1961, being established by the Company, either singly or along with any other Company;

(ii) Company established under section 8 of the Companies Act 2013, or registered Trust, or registered Society, being established by (Indian) Central Government or (Indian) State Government;

(iii) Company established under section 8 of the Companies Act 2013, or Trust, or Society registered under section 12-A and 80-G of the (Indian) Income Tax Act 1961, and having an established track record of at least three years in undertaking similar CSR activities; or

(iv) Any entity established under an Act of (Indian) Parliament or a (Indian) State Legislature.

4. The Company shall conduct due diligence prior to selection of an entity as its implementation agency, to inter alia verify the credentials and ensure that the proposed implementation agency is eligible and capable of being appointed as such.

5. The Company may engage international organizations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR policy as well as for capacity building of their own personnel for CSR.

The Company may also collaborate with other Companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective Companies are in a position to report separately on such projects or programmes in accordance with these rules.

6. The Board shall empower the Implementation Group to finalize, approve and execute various agreements, deeds, writings, confirmations, undertakings or other documents, as may be necessary, under the Common Seal of the Company or otherwise, with any party including Implementing Agencies and/or others for the purposes of the CSR Policy and accept modifications, changes and amendments to any such documents/ agreements as it may deem fit.

7. In case of failure to ensure the minimum CSR Expenditure i.e. 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years, detailed reasons for the same should be submitted by the Implementation Group to the CSR Committee and the Board. Further the Board shall duly include such explanation in their annual Board of Directors' report.

7. CSR COMMITTEE

1. The CSR Committee shall be responsible for providing recommendations to the Board with respect to CSR Activities that may be undertaken by the Company in accordance with the CSR Policy as well as the Act and the CSR Rules.

2. Without prejudice to the generality of the foregoing, the CSR Committee shall be responsible for the following activities:
   (i) Formulating and recommending CSR activities to the board of directors;
   (ii) Recommend amount of expenditure;
   (iii) Monitor CSR policy of the Company; and
   (iv) Formulate annual action plan in pursuance of the CSR policy in accordance with the applicable law, and inclusive of the following items:
      (a) the list of CSR projects or programmes 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 programmes;
      (c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
      (d) monitoring and reporting mechanism for the projects or programmes; and
      (e) details of need and impact assessment, if any, for the projects undertaken by the company.

3. The CSR Committee shall consist of at least three Directors of the Company, out of which at least one Director shall be an Independent Director. The number of members of the CSR Committee and their powers and functions can be specified, varied, altered or modified from time to time by the Board, subject to the provisions of the applicable law.

4. The CSR Committee shall hold meetings which shall be attended by minimum of two members of the Committee or one-third of its total strength (rounding up fractions), whichever is higher. The meetings may be held at the registered office or at any other place as may be agreed by the members of the Committee through physical or audio-video mode.

5. All questions of interpretation or discrepancies which shall arise under, or as a result of, or pursuant to, or in connection with the implementation of the CSR Policy or any initiative or activities undertaken by the Company in terms of the CSR Policy, shall be referred to the CSR Committee for their inputs and the final decision/determination/ interpretation shall rest with the Board.

6. No member of the CSR Committee shall be personally liable for any decision or action taken in good faith with respect to the CSR Policy.

8. CSR EXPENDITURE

1. The Company shall spend, in every financial year, at least 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years in accordance with the provisions of the Act and the Rules and its CSR Policy.

2. The CSR Committee shall recommend the manner in which the CSR Expenditure shall be incurred in a year, in accordance with the Act and the Rules and the CSR Policy.

3. The Board shall be responsible for sanctioning the CSR Expenditure along with the CSR Committee for taking steps to ensure that the amount for the CSR Expenditure is available to the Implementation Group for application towards the CSR Activities.

4. Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company and may only be re-allocated/ ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of this CSR Policy and the annual action plan for the financial year in which such surplus has arisen 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.

5. In order to count towards CSR Expenditure, CSR Activities must be undertaken in compliance with the applicable laws and shall not include the following:

   (i) activities undertaken in pursuance of normal course of business of the Company;

   (ii) any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;

   (iii) contribution of any amount directly or indirectly to any political party under Section 182 of the Act;

(iv) activities benefitting employees of the Company as defined in clause (k) of Section 2 of the Code on Wages, 2019 (29 of 2019);

(v) activities supported by the Companies on sponsorship basis for deriving marketing benefits for its products or services; and

(vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India.

6. The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.

7. All the expenditure relating to CSR shall be pre-approved by the CSR Committee. The Chief Financial Officer (CFO) or the person responsible for financial management shall monitor the utilization of funds for the purposes set forth and certify to this effect, which may be placed at Board meeting where Board's Report containing annual report on CSR is placed for its approval.

8. Unspent CSR amount, if any, shall be transferred to separate account in accordance with the applicable CSR Rules from time to time.

9. MONITORING PROCESS

1. To ensure that the objectives of CSR Policy are being met in an efficient and effective manner, the utilisation of the amount sanctioned towards CSR Activities should be reported by the Implementation Group to the Board as well the CSR Committee on a quarterly/six months basis or in such manner as the CSR Committee may direct.

2. In the event any of the CSR Activities are undertaken through an Implementing Agency, the Implementation Group should obtain relevant information from the Implementing Agency and ensure that the progress on such CSR Activity is submitted to the Board as well the CSR Committee on a quarterly/six months basis or in such manner as the CSR Committee may direct.

3. For the purposes of monitoring, the Implementation Group may visit the Implementation Agency site to review CSR project and carry out inspections as recommended by the CSR Committee from time to time.

4. Upon receipt of such progress report by the Implementation Group, the CSR Committee may review and deliberate upon such reports and provide such inputs or recommendations, as it may deem necessary, to the Board.

5. Notwithstanding anything to the contrary, the Board shall not be obliged to comply with the recommendations of the CSR Committee.

10. REPORTING AND RECORD KEEPING

1. The CSR Committee shall maintain proper minutes of all its meetings.

2. The Board's report of the Company shall include an annual report on CSR containing the particulars set out in Annexure A to this CSR Policy and such other details as may be prescribed from time to time under the Act and the CSR Rules.

3. In respect of the reporting, the Board will be responsible to ensure that:

   (i) The report of the Board includes the annual report on CSR Activities of the Company and sets out the requisite information in terms of the Act and the Rules;

   (ii) The contents of the latest and updated version of the CSR Policy is included in the report of the Board;

   (iii) The contents of the CSR Policy along with composition of the CSR committee, and projects approved by the Board are also made available on the website of the Company.

   (iv) In case of failure to ensure the minimum CSR Expenditure, detailed reasons for the same shall be adequately disclosed in the Board Report.

   (v) Every Company having average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

   (b) The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.

   (c) A Company undertaking impact assessment may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed 2 [two percent] of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is higher.

11. AMENDMENT

1. The CSR Committee shall be fully responsible for the monitoring and review of the implementation of this policy in accordance with applicable laws from time to time. The CSR Committee shall provide recommendations as and when it deems necessary to the Board so as to amend/ modify/ revise the CSR Policy.

2. The Board of the Company may, subject to compliance with applicable law, at any time alter, amend or modify the CSR Policy as it deems fit to comply with the statutory obligation of the Company to undertake the CSR Activities.

ANNEXURE A

ANNUAL REPORT OF THE CORPORATE SOCIAL RESPONSIBILITY (CSR) ACTIVITIES

1. **Brief outline of CSR Policy of the Company:**

2. **Composition of CSR Committee:**

S. No.	Name of Director	Designation/ Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year
1.				
2.				
3.				

3. **Provide the web-link(s) where Composition of CSR Committee, CSR Policy and CSR Projects approved by the board are disclosed on the website of the Company.**

   Composition of CSR Committee:
   CSR Policy:
   CSR Projects:

4. **Provide the executive summary along with the web-link(s) of Impact Assessment of CSR Projects carried out in pursuance of sub-rule (3) of rule 8, if applicable.**

5. (a) Average net profit of the Company as per sub-section (5) of section 135.

   (b) Two percent of average net profit of the Company as per sub-section (5) of section 135.

   (c) Surplus arising out of the CSR Projects or programs or activities of the previous financial years.

   (d) Amount required to be set off for the financial year, if any.

   (e) Total CSR obligation for the financial year [(b)+(c) -(d)].

6. (a) **Amount spent on CSR Projects (both Ongoing Project and other than Ongoing Project):**

(i) Details of CSR amount spent against ongoing projects for the financial year:

S. N.	Name of Project	Items from the list of Activities in Schedule VII to the Act	Local Area	Location of project	Project Duration	Project Duration	Amount spent in the current financial year (in Rs.)	Amount transferred to Unspent CSR account for the project as per Section 135(6) (in Rs.)	Mode of implementation - Direct (in Rs.)	Mode of implementation through implementation agency

(ii) Details of CSR amount spent against other than ongoing projects for the financial year:

S. N.	Name of the project	Items from the list of activities in schedule VII to the act.	Local area (Y/N)	Location of project	Amount spent on the project (in Rs.)	Mode of implementation Direct (Yes/No)	Mode of implementation through implementation agency	
							Name	CSR Registration No.

(b) Amount spent on administrative overheads.
(c) Amount spent on Impact Assessment, if applicable.
(d) Total amount spent for the Financial Year [(a)+(b) +(c)].
(e) CSR amount unspent for the Financial Year:

Total Amount Spent for the Financial Year. (in Rs.)	Amount Unspent (in Rs.)				
	Total Amount transferred to Unspent CSR Account as per sub-section (6) of section 135.		Amount transferred to any fund specified under Schedule VII as per second proviso to sub-section (5) of section 135.		
	Amount	Date of Transfer	Name of the Fund	Amount	Date of transfer

(f) Excess amount for set-off, if any:

Sl. No.	Particular	Amount (in Rs.)
i.	Two percent of average net profit of the company as per sub-section (5) of section 135	
ii.	Total amount spent for the Financial Year	
iii.	Excess amount spent for the Financial Year [(ii)-(i)]	
iv.	Surplus arising out of the CSR projects or programs or activities of the previous Financial Years, if any	
v.	Amount available for set off in succeeding Financial Years [(iii)-(iv)]	

7. **Details of Unspent Corporate Social Responsibility amount for the preceding three Financial Years:**

S. N.	Preceding Financial Year(s)	Amount transferred to Unspent CSR Account under sub-section (6) of section 135 (in Rs.)	Balance Amount in Unspent CSR Account under sub-section (6) of section 135 (in Rs.)	Amount Spent in the Financial Year (in Rs)	Amount transferred to a Fund as specified under Schedule VII as per second proviso to sub-section (5) of section 135, if any	Amount remaining to be spent in succeeding Financial Years (in Rs)	Deficiency, if any

					Amount (in Rs)	Date of Transfer		
1.	FY-1							
2.	FY-2							
3.	FY-3							

8. **Whether any capital assets have been created or acquired through Corporate Social Responsibility amount spent in the Financial Year:**

   Yes/ No

   If Yes, enter the number of Capital assets created/ acquired.

   Furnish the details relating to such asset(s) so created or acquired through Corporate Social Responsibility amount spent in the Financial Year:

S. N.	**Short particulars of the property or asset(s) [including complete address and location of the property]**	**Pin code of the property or asset(s)**	**Date of creation**	**Amount of CSR amount spent**	**Details of entity/ Authority/ beneficiary of the registered owner**		
					CSR Registration Number, if applicable	**Name**	**Registered address**

   (All the fields should be captured as appearing in the revenue record, flat no, house no, Municipal Office/Municipal Corporation/ Gram panchayat are to be specified and also the area of the immovable property as well as boundaries)

9. **Specify the reason(s), if the Company has failed to spend two per cent of the average net profit as per sub-section (5) of section 135.**

Sd/- (Chief Executive Officer or	Sd/- (Chairman CSR Committee).	Sd/- [Person specified under clause (d) of sub-section (1) of section 380] Managing Director or Director). (Wherever applicable)