HORIBA INDIA PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Content

HORIBA

I. Document Control

Document number	HIN – CSR - Policy – 01
Issue number	01
Issue Date	06.06.2025
Version	01
Dated	06.06.2025
Prepared by	Kanika Thakur
Reviewed by	Sanjay Dubey
Approved by	Dr. Rajeev Gautam

Revision History

Revision no.	Revision date	Revision author	Remarks
NA	NA	NA	Initial release

HORIBA India Corporate Social Responsibility Policy

II. Introduction

HORIBA India Private Limited (hereinafter referred to as "**HORIBA India**" or "**the Company**") is committed to contributing positively to society through its Corporate Social Responsibility ("**CSR**") initiatives, aimed at enhancing the well-being and quality of life of communities. Our CSR philosophy stems from HORIBA India's vision to drive meaningful social impact while fostering sustainable growth, and is anchored in our motto, "Together we grow". This CSR Policy ("**Policy**"), effective from **20 February 2025**, has been designed to align with the principles outlined under Section 135 of the Companies Act, 2013 and the Companies (CSR) Rules, 2014 ("**CSR Rules**") prescribed thereunder.

Through its CSR initiatives, HORIBA India aims to develop and support programs that address key societal needs, with a strong focus on Sustainable Development Goals (SDGs). These efforts reflect the Company's commitment to encourage inclusive development and providing platforms for communities to thrive.

This Policy provides the guiding framework for the identification, execution, and governance of HORIBA India's CSR initiatives. With a structured approach to program implementation, the Policy outlines mechanisms for engaging with communities, selecting impactful projects, and achieving sustainable outcomes. All CSR activities undertaken by HORIBA India will prioritize transparency, accountability, and community-centric values to ensure positive and long-lasting change.

The Policy shall be effective immediately upon approval by the Board and will supersede and replace the existing policy if any. As per the provisions of the Companies Act, 2013, the Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities.

III. Statutory Provisions

The provisions of Section 135 of the Companies Act, 2013 read with the CSR Rules as amended from time to time, require every Company:

a) Having net worth of rupees five hundred crore or more, or;
b) Turnover of rupees one thousand crore or more or;
c) Net profit of rupees five crore or more
during the immediately preceding financial year to undertake Corporate Social Responsibility (CSR) activities as specified under Schedule VII of the Act.

As per the provisions of Section 135(5) of the Companies Act, 2013, the Company shall spend, in every financial year, **at least two percent of the average net profits of the Company** made during the three immediately preceding financial years in pursuance of its CSR Policy.

IV. Objective

The Policy, aligned with the Company's Vision, outlines the guidelines and mechanisms for executing CSR Projects and Programs. These initiatives will be designed and implemented with a targeted approach to maximize their impact on the intended beneficiaries. The Company may collaborate with reputable implementing agencies to carry out its CSR Projects and Programs.

V. Scope and Applicability

This Policy applies to all CSR initiatives and projects undertaken by HORIBA India. The Policy encompasses projects and programs that the Company implements independently or in collaboration with other organizations, companies, or partner entities. All CSR activities are aligned with the goals and guidelines set forth in this Policy, ensuring consistency and impact across all initiatives. Whether conducted within the Company's operational areas or in broader communities, all CSR projects adhere to the regulatory framework defined in Schedule VII of the Companies Act, 2013. This Policy serves as a guiding document for HORIBA India's CSR activities, facilitating sustainable development and creating value for society in alignment with the Company's vision and core values.

VI. Definitions

- **"Corporate Social Responsibility" (CSR)** means the activities undertaken by the Company in pursuance of its statutory obligation laid down in Section 135 of the Companies Act, 2013, in accordance with the provisions contained in the CSR Rules, but shall not include the following, namely:

– activities undertaken in pursuance of normal course of business of the Company.

– 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.

– contribution of any amount directly or indirectly to any political party.

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

– activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services.

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

- **"CSR Activities"** means the activities to be undertaken by HORIBA India in areas or subject specified in Schedule VII to the Companies Act, 2013 and specified under this Policy.

- "**CSR Committee**" includes a committee established by the Board of Directors to oversee CSR governance.

- "**CSR Expenditure**" includes total spend on approved CSR projects.

- **"CSR Policy/ Policy"** means Corporate Social Responsibility Policy of HORIBA India.

- **"CSR Rules"** means the Companies (Corporate Social Responsibility Policy) Rules, 2014.

- "**Ongoing Project**" includes CSR projects exceeding one year in duration but limited to three years, excluding the commencement year.

VII. CSR Programs and Projects

The Company will conduct its CSR activities in accordance with the areas and subjects specified under Schedule VII of the Companies Act,2013, as amended from time to time. A representative list of these areas and subjects is provided below:

- 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.

- Promoting education, including special education and employment enhancing vocation skills, especially among children, women, elderly, and the differently abled and livelihood enhancement projects.

HORIBA

- Promoting gender equality empowering women, setting up homes and hostels for women and orphans; setting up old age homes, daycare centres, and such other facilities for senior citizens, and measures for reducing inequalities faced by socially and economically backward groups.

- 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 Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.

- 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.

- Measures for the benefit of armed forces veterans, war widows, and their dependents; Central Armed Police Forces (CAPF) and Central Paramilitary Forces (CPMF) veterans, and their dependents including widows.

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

- 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.

- Contribution 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 or Public Sector Undertaking or any agency of the Central Government or State Government

- Contributions to 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 Defence Research and Development Organisation (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).

- Rural development projects.

- Slum area development.

- Disaster management, including relief, rehabilitation, and reconstruction activities.

- Any other activity as may be specified under the Companies Act, 2013 or the CSR Rules from time to time.

VIII. Implementation

HORIBA India will implement the CSR initiatives either through direct action or in collaboration with other organizations, companies, or partner entities such as credible NGOs or registered public charitable trusts as prescribed under Rule 4(1) of CSR Rules.

IX. CSR Committee and Responsibility

HORIBA India is dedicated to managing its CSR initiatives with transparency, accountability, and strategic oversight. To achieve this, the Board of Directors has constituted a CSR Committee, whose members bear the responsibility of guiding and supervising the Company's CSR activities to ensure effective implementation and impactful outcomes.

The primary responsibilities of the CSR Committee include the following:

- The CSR Committee is entrusted with formulating a comprehensive Policy that aligns with HORIBA India's values and meets statutory guidelines. This includes identifying core focus areas, defining overarching CSR objectives, and recommending any related initiatives to the Board of Directors for approval. The Policy will be periodically reviewed to ensure relevance and alignment with emerging social needs.

- Each financial year, the CSR Committee will define specific CSR project plans, outlining detailed objectives, scope, and expected outcomes for each initiative. The Committee will prepare an annual budget for CSR activities, ensuring adequate allocation of funds to meet statutory requirements and project goals. Additionally, the CSR Committee will establish clear implementation strategies, timelines, and partnership frameworks to ensure smooth and effective project execution.

- The CSR Committee will actively oversee the progress of CSR projects, tracking key performance indicators to measure the effectiveness and impact of each initiative. Regular monitoring will help ensure that projects remain aligned with the defined objectives, comply with statutory requirements, and deliver measurable benefits to society. The CSR Committee will also address any deviations or challenges to maintain adherence to CSR goals.

- At the end of each financial year, the CSR Committee will compile a comprehensive report detailing the activities, achievements, and outcomes of HORIBA India's CSR initiatives. This report will provide insights into the social and environmental impact of the Company's efforts and highlight areas for future improvement. The CSR Committee will present the report to the Board of Directors for review and approval, ensuring transparency in CSR performance and accountability to stakeholders.

X. Meetings of CSR Committee

For smooth functioning of the Committee, the members shall meet as below to discuss such matters and to take such decisions as may be necessary.

a. The CSR Committee shall hold at least one meeting per year.

b. The members of the Committee may mutually agree between them regarding time and place for the said meetings.

c. The quorum for the CSR Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.

d. The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio-visual means as may be convenient.

XI. Budget and Financial Outlay

HORIBA India is committed to ensuring effective financial management of its CSR initiatives. To fulfil this commitment, the Company will allocate an annual budget for CSR activities, ensuring compliance with statutory obligations as outlined in the Companies Act, 2013 and associated regulations. The financial framework for CSR activities will include the following key components:

- Each financial year, HORIBA India will allocate a dedicated budget for CSR initiatives based on the statutory requirements, which stipulate that a minimum percentage of the Company's average net profits for the preceding three financial years must be set aside for CSR activities. This budget will cover all approved projects and programs, enabling effective planning and execution of initiatives that align with the Company's CSR objectives.

- If there are unspent funds allocated for ongoing CSR projects at the end of a financial year, these funds will be transferred to an "Unspent CSR Account." This account is designated for the specific purpose of carrying forward the unspent amount, with the intention of utilizing these funds for the ongoing projects within a period of three years from the date of allocation. This ensures that the funds are effectively utilized for their intended purpose.

- For any unspent funds related to activities outside of ongoing projects, HORIBA India will adhere to the guidelines. Such unspent amounts will be directed to a Fund specified in Schedule VII of the Companies Act, 2013 within a period of 6 months of the expiry of the financial year.

- In cases where CSR projects generate surplus funds, HORIBA India will make a strategic decision regarding the utilization of these surpluses. Surplus funds may either be reinvested into existing CSR initiatives to enhance their impact or directed to other approved CSR funds, as stipulated in the CSR Rules. This approach ensures that any additional resources generated from CSR activities continue to support the Company's commitment to social responsibility and community development.

By implementing this comprehensive budgeting and financial management framework, HORIBA India aims to ensure that its CSR initiatives are not only compliant with statutory obligations but also effective in delivering meaningful benefits to society. The Company's commitment to responsible financial stewardship will facilitate the successful execution of its CSR objectives and enhance its overall impact on the communities it serves.

XII. Monitoring and Reporting

Effective monitoring will be maintained through a timely review of CSR project metrics, fund utilization, and progress reports. The CSR Committee may assign monitoring tasks to external agencies for objective assessment and may conduct impact assessments for projects as required by law.

XIII. Mandatory Impact Assessment

If at any time Company's average CSR expenditure obligation for immediately three preceding financial years is ten crore rupees or more, it shall conduct an impact assessment through an independent agency for CSR projects with an outlay of one crore rupees or more, provided these projects have been completed for at least one year. The Company may also choose, on a voluntary basis, to carry out an impact assessment of its CSR initiatives to evaluate the tangible benefits realized by the beneficiaries.

The impact assessment reports shall be presented to the Board and included as an annexure to the annual CSR report.

Any expenditure incurred for impact assessment may be accounted for under Corporate Social Responsibility for the respective financial year, subject to a limit of either two percent of the total CSR expenditure for the year or fifty lakh rupees, whichever is higher.

XIV. Employee Volunteerism

Employees and workers are encouraged to participate in CSR activities on a voluntary basis, with opportunities provided to engage in social development projects aligned with the Company's focus areas.

XV. Disclosure and Transparency

HORIBA India will comply with statutory disclosure requirements, ensuring transparency in reporting CSR initiatives in the annual report and on the Company's website.

HORIBA

XVI. Communication of the Policy

This Policy will be available on the Company website: in.horiba.com

XVII. Review

The CSR Committee shall be responsible for reviewing this Policy from time to time, as may be required in response to evolving needs, amendments to applicable laws and regulations, or the introduction of any new relevant legislation. Any revisions to the Policy shall be subject to approval by the Board.