

VEDANTA ALUMINIUM METAL LIMITED

Document Title	Corporate Social Responsibility Policy (CSR Policy)
Approved By	Board of Directors
Effective Date	May 1, 2026

TABLE OF CONTENTS

S. No.	Particulars
1	Policy Objective
2	VAML's CSR Philosophy
3	Thematic Focus Areas
4	Guiding Principles for Projects Selection and Implementation
5	Governance – Review, Monitoring Mechanism and Formulation of Annual Action Plan
6	Impact Assessment of Projects/Programs
7	Audit
8	Communication
9	Responsibility
10	Review of Policy
11	Amendments in Law
12	Annexure I – CSR Activities at VAML

VEDANTA ALUMINIUM METAL LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. POLICY OBJECTIVE

Vedanta Aluminium Metal Limited ("VAML" 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.

2. VEDANTA ALUMINIUM METAL LIMITED CSR PHILOSOPHY

VAML is committed to reinvesting 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."

- VAML believes in contributing positively to integrated and inclusive development through partnerships with Central and State Governments, corporates, civil society organizations, academic institutions, multilateral agencies, and community-based institutions.
- The long-term sustainability of VAML's business is intrinsically linked to enduring and mutually beneficial relationships with stakeholders, especially communities.
- Employees play a vital role in strengthening resilient communities alongside driving business excellence.

3. THEMATIC FOCUS AREAS

CSR programs are anchored in poverty alleviation and integrated development, based on CSR Strategy 2030, derived from independent baseline and need assessments, and aligned with national and global development priorities. Within the below mentioned thematic areas, the company may undertake, scale and position select initiatives as marquee/flagship CSR Projects to create high impact, sustainable and scalable outcomes.

- Children's Well-being & Education

- Women's Empowerment

- Health Care
- Water & Sanitation
- Sustainable Agriculture & Animal Welfare
- Market-linked Skilling
- Environmental Protection & Restoration
- Sports & Culture
- Development of Community Infrastructure
- Participation in programs of national importance including disaster mitigation, relief, rehabilitation

The CSR activities detailed in the Annexure 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.

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 based on the CSR Strategy 2030 and recommendations of the need assessment and baseline survey report conducted every three years by an Independent Agency.

VAML shall adopt the following implementation models for delivering its CSR programs:

- **Partnerships:** Collaboration with third parties such as Section 8 companies/civil society/NGOs including multilateral & international agencies, academic and training institutions, corporates, government bodies and Community led Institutions.
- **Direct Engagement:** In-house implementation by VAML and/or through foundations established for this purpose, encompassing project design and delivery.

The Annual Action plan shall be formulated based on the project identified in line with the CSR Strategy 2030 and outcomes of independent need assessments and baseline survey report. The CSR Committee shall review and determine the CSR activities and recommend the Annual Action Plan to the Board of Directors for approval.

5. GOVERNANCE, REVIEW AND MONITORING

VAML aligns its CSR processes with Vedanta Technical standards across the project life cycle. A multi-tiered governance mechanism enables 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, review of audit reports and its compliances, and assessment of CSR processes and its outcomes.
- Review and approval of annual CSR plans and budgets by the CSR Executive Committee and Management Committee (CSR Exco & Mancom), along with quarterly monitoring of program progress
- Oversight by the CSR Committee of the company, which shall meet at least twice a year to approve the annual CSR plan and budget, ensure alignment of CSR activities with Board approved CSR Policy, and review the program progress.

The Board of Directors shall satisfy itself that the CSR funds have been utilized for the approved purposes and in the prescribed manner. The Chief Financial Officer or the person responsible for financial management shall certify to the effect.

Any surplus, arising from CSR initiatives of the Company shall not form part of the Company's business profits. Any unspent amounts after adjustment of any excess expenditure from previous financial years, shall be classified as relating to ongoing or non-ongoing projects and transferred to the designated escrow account or fund, in accordance with applicable legal requirements.

Further, any CSR expenditure more than the prescribed two percent obligation, may be carried forward and set off against the CSR obligation of up to the immediate succeeding 3 financial years, in line with Section 135(5) of Companies Act, 2013.

6. IMPACT ASSESSMENT

VAML shall undertake the impact assessment wherever applicable as per the below requirement under Companies Act, 2013:

Every Company having average CSR obligation of ₹ 10 Crore or more in pursuance of Section 135(5) of the 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 assessment of other projects, once every three years.

7. AUDIT

All CSR activities and expenditures shall be subject to audit by independent external agencies.

The CSR Committee shall review compliance with applicable legal and regulatory requirements.

8. COMMUNICATION

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

9. 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.

10. REVIEW OF POLICY

The CSR Policy shall be reviewed as may be deemed necessary by the CSR Committee and the Board of VAML.

11. 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 VAML

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 **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 like **Bhoremdev Vidya Pit** to prepare and support students for higher education in civil services such as CGPHS and Chhattisgarh Vayapam through programs like, 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 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, 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, 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** and other women-led collectives and enterprises.

7. Sports

- Sports development initiatives, including football and archery programs such as **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 & Culture

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

9. Livelihood

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

9. Skill Development

- Initiatives focused on skilling, upskilling, and reskilling of youth through institutions such as **Vedanta Skill School, Vedakshata** and other market-linked vocational, technical, and professional training interventions.

10. 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.