



Sammaan Capital Limited
(Formerly known as Indiabulls Housing Finance Limited)

Corporate Social Responsibility
(Reviewed and Approved by the Board in its meeting held on 15/05/2026)

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1 Introduction and Overview

1.1 Purpose and Objective

Company ("COMPANY"), a well-established and successful corporate conglomerate, has since long been involved in activities of social welfare.

This Corporate Social Responsibility (CSR) policy of Company ("the Company" or "Company") will ensure an effective and sustained CSR program which will manifest in the form of a progressive, socially responsible and enlightened attitude. CSR activities will be environment friendly and conducive to growth.

1.2 Target Audience

The contents of this policy are applicable in its entirety, to all the personnel of the Company. This policy will be the primary responsibility of the CSR Committee constituted by the Board of Directors of the Company ("Board"). A copy of this policy shall be available on the web-site of the Company.

1.3 Applicability and Validity of the Policy

This policy will become applicable from such date as approved by the Board of Directors.

The CSR Committee will review, validate, update and the Board of Directors will approve the policy at least annually. Any revision in specific aspects of this policy may be communicated through mandates issued by the relevant authority and will become part of this policy from the date they become effective.

1.4 Regulatory and Statutory Reference

With the promulgation of the Companies Act, 2013 (hereinafter referred to as "Act") on September 2013 and the notification of Section 135 of the Act read with Schedule VII of the Act, dealing with the aspect of corporate social responsibility as also of the Rules laid down to such effect to the Act, which have come into force on the 1st day of April, 2014 (the CSR Rules), it has become mandatory for the corporate entities falling within the purview of the limits as to Net worth, Turnover or Profitability as laid down in the said section read with the CSR Rules, to undertake any one or more of the activities as laid

down thereunder, discharge of their responsibility towards the society in general (the "Corporate Social Responsibility" or briefly "CSR").

The Company being a corporate entity falling within the purview of Section 135 of the Act read with CSR Rules, has constituted the CSR Committee and formulated a board approved CSR Policy of the Company.

2 Focus Areas for CSR Initiatives

Corporate Social Responsibility Activities (CSR Activities) shall mean any one or more of the following objectives / purposes, being pursued / undertaken / to be undertaken by the Company, either directly or in collaboration with other companies or through any other registered trust or society or a Company set up for the purpose of undertaking similar programs or projects, within the purview of CSR Rules:

- i. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by 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 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. Measure for the benefit of armed force 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 Olympics sports;
- viii. contribution to the Prime Minister's National Relief Fund or Prime Minister's Central 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) 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; and

(b) 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 Defense 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).

- 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.
- xiii. Any other activity, as may be notified by the Central Government from time to time.
- xiv. The Company has adopted a detailed Healthcare CSR Implementation Framework (Annexure A / Schedule I) which provides comprehensive guidelines for:
 - Hospital Support Program - infrastructure, equipment, and operational support to healthcare institutions
 - Individual Patient Funding Program - financial assistance to financially constrained patients for critical medical treatments
 - Eligibility criteria, due diligence requirements, funding mechanisms, disbursement protocols, and monitoring procedures

The Healthcare Framework shall be read in conjunction with this CSR Policy and forms an integral part hereof.

The above list of CSR activities is indicative and not exhaustive. The Company may undertake any other activity included in Schedule VII of the Companies Act, 2013 as amended from time to time. In the event of any amendment to Schedule VII, such amended activities shall be deemed to be automatically included in this policy without requiring specific Board amendment, provided the CSR Committee approves the activity and recommends to the Board.

The Company may undertake CSR activities through:

- (a) its own entity;
- (b) a registered trust, registered society or a company established under Section 8 of the Act by the Company, either singly or along with its subsidiary or associate company, or along with any other company, provided such entity has an established track record of undertaking similar activities;
- (c) a registered trust or registered society or a company established under Section 8 of the Act, established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature;

(d) any other entity established under an Act of Parliament or a State legislature; or

(e) in collaboration with other companies, provided the CSR Committees of respective companies are in a position to report separately on such projects or programmes.

3 CSR Contribution and CSR Spend

The contribution by the Company in every financial year towards CSR Activities / programs / projects shall be a minimum of 2% of its average Net Profits for three immediately preceding financial years.

CSR spend shall be governed by the following principles:

- i. It is hereby explicitly stated that any surplus arising out of the CSR Activities shall not form a part of the business profits of the Company.
- ii. In case of unspent/unutilized CSR expenditure.
 - For ongoing projects: The amount shall be transferred to a special bank account (Unspent CSR Account) within 30 days from the end of the financial year. Such amount shall be spent within three financial years from the date of transfer, failing which it shall be transferred to a Fund specified in Schedule VII of the Act within 30 days from the date of completion of the third financial year.
 - For other than ongoing projects: The amount shall be transferred to a Fund specified in Schedule VII of the Act within six months from the end of the financial year.

The CSR Committee shall define and identify 'ongoing projects' based on their multi-year implementation timeline and monitor the same.

- iii. CSR programs / projects / activities meant exclusively for employees and their families will not qualify under CSR spent.
- iv. Contribution of any amount directly or indirectly to any politically party shall not be considered as CSR program / project / activity.
- v. CSR Expenditure shall not include any expenditure on any program or project or activities which is not in conformity with the Company's CSR Policy and the activities include activities, areas or subjects specified in Schedule VII of the Act.

4 Composition of the CSR Committee

The Company has a duly constituted CSR Committee comprising of three directors, two directors being Non-Executive Independent Directors and one being an Executive Director. The Chairman of the Committee is a Non-Executive Independent Director.

The Company Secretary acts as the Secretary to the CSR Committee.

5 Functioning of the CSR Committee

The CSR Committee formed towards effectuation and implementation of the CSR Activities shall identify and recommend the specific CSR activity (ies), which shall include the list of CSR projects or programmes that are approved to be undertaken, the manner of execution, the modalities of

utilization of funds, implementation schedules and monitoring and reporting mechanism, to the Board of Directors of the Company for its consideration and approval, subject to any alteration or modification at any time during the financial year based on the recommendation of the CSR Committee. Based on the Board's approval the required funds shall be infused into approved CSR activities. The same shall constitute the CSR Contribution of the Company for the relevant financial year.

The Committee shall institute a transparent monitoring mechanism for implementation of the CSR activities such as:

- i. CSR Committee shall meet up at least once every quarter to discuss, review and monitor the CSR activities of the Company. Additional meetings may be convened as and when required. The quorum for CSR Committee meetings shall be at least two members or one-third of the total strength, whichever is higher.
- ii. CSR Committee shall obtain and review the relevant progress reports and impact of various CSR programs / projects / activities implemented and to identify gaps / slippages therein and to plan corrective measures as may be required for the purpose.
- iii. CSR Committee shall ensure that the projects / programs / activities that are undertaken by the Company are in compliance with various applicable laws / regulations of the areas as identified for CSR expenditure.
- iv. CSR Committee shall ensure that appropriate documentation of all the programs / projects / activities, statements of the budget & expenditure are being undertaken on regular basis.
- v. including implementation of sector-specific frameworks such as the Healthcare CSR Implementation Framework, ensuring compliance with defined eligibility criteria, due diligence processes, documentation requirements, and impact assessment protocols.
- vi. CSR Committee shall submit progress updates on CSR activities undertaken to the Board of Directors, from time to time.
- vii. The Board shall ensure that the Annual Report on CSR is prepared and forms part of the Board's Report for each financial year, disclosing: (a) a brief outline of the CSR Policy; (b) composition of the CSR Committee; (c) average net profit for three preceding financial years; (d) prescribed CSR expenditure (2% of average net profit); (e) details of CSR amount spent during the financial year; (f) manner in which the amount was spent; (g) reasons for not spending, if applicable; (h) CSR Committee's responsibility statement. The format shall be as prescribed in Annexure I or Annexure II to the CSR Rules, as applicable.

6 Overall Improvement in Functioning and Discharge of CSR

The Committee shall from time to time explore the ways and means whereby improvements that need to be brought about towards the discharge of CSR by the Company are identified and steps taken to ensure that measures necessary to effectuate the areas of improvement so identified are taken in the right earnest.

7 Impact Assessment

Where the Company has average CSR obligation of Rs. 10 crore or more in the three immediately preceding financial years, the Company shall undertake impact assessment through an independent

agency for CSR projects having outlays of Rs. 1 crore or more and which have been completed not less than one year before undertaking the impact assessment. The impact assessment reports shall be placed before the Board and annexed to the Annual Report on CSR. The expenditure towards impact assessment shall be treated as part of CSR expenditure, subject to the condition that it shall not exceed five percent of the total CSR expenditure for that financial year or Rs. 50 lakhs, whichever is less.

8 Administrative overheads

Administrative overheads for general management and administration of CSR functions (excluding expenses for a specific CSR project or programme) not exceeding five percent of total CSR expenditure of the Company for the financial year may be included as part of CSR expenditure. The CSR Committee shall ensure proper monitoring and disclosure of such overheads.

9 Annual Certification

In accordance with the CSR Rules, the Chief Financial Officer shall:

- (a) ensure that amounts earmarked for CSR expenditure are utilized for the approved projects/programmes only;
- (b) certify that the funds disbursed have been utilized for the purposes and in the manner approved by the Board;
- (c) ensure proper accounting and disclosure of CSR expenditure, including administrative overheads separately;
- (d) coordinate with the Company Secretary for timely reporting in Board's Report and on the website.

10 Abbreviations

Abbreviations	Details
CSR	Corporate Social Responsibility

Annexure A - Healthcare CSR Implementation Framework" to the main CSR Policy

1. Purpose

This Policy outlines the framework under which the Company shall undertake CSR activities in the healthcare sector through:

1. Financial and infrastructure support to hospitals and medical institutions.
2. Financial assistance to economically weaker and/or financially constrained patients.

This Policy is in accordance with Section 135 of the Companies Act, 2013 and Schedule VII (promoting healthcare including preventive healthcare).

2. Guiding Principles

The Company shall:

- Promote equitable access to healthcare.
- Support financially constrained people
- Ensure transparency in selection and funding.
- Avoid conflict of interest or personal benefit.
- Ensure activities are not in the normal course of business.
- No member of the Board, CSR Committee, or their immediate family members (spouse, children, parents, siblings) shall be eligible for financial assistance under the Individual Patient Funding Program. Any proposal involving medical treatment for employees or their family members shall be disclosed to the CSR Committee with full details and shall be approved only after documented assessment demonstrating genuine financial hardship and arm's length evaluation. The concerned employee shall not be involved in the approval / payment process.

I. PART A – HOSPITAL SUPPORT PROGRAM

3. **Scope of Hospital Support** The objectives of the Program are:

- To improve healthcare infrastructure in underserved areas.
- To support hospitals serving economically weaker sections or financially constrained persons.
- To enhance diagnostic, treatment, and emergency response capacity.
- To promote affordable and accessible healthcare.

CSR support may include:

A. Infrastructure Support

- Construction / renovation of hospital wards.
- ICU / NICU setup.
- Operation theatres.
- Rural health centers.
- Patient waiting areas.

B. Medical Equipment Support

- Ventilators.
- Dialysis machines.
- Ultrasound machines.
- X-ray units.
- CT / MRI support (subject to approvals).
- Laboratory equipment.

C. Diagnostic & Preventive Health Support

- Diagnostic camps.
- Mobile medical units.
- Screening programs (cancer, diabetes, cardiac).
- Vaccination drives.

D. Capital Support

- Medical equipment (ICU beds, ventilators, dialysis machines, diagnostic equipment).
- Ambulances.
- Setting up diagnostic labs.
- Infrastructure development/renovation in all kinds of hospitals including government or charitable hospitals.
- Any other health care or medical support purpose as may be approved by CSR committee of the Company.

E. Operational Support

- Support for free or subsidized treatment programs
- Sponsorship of specific wards (e.g., oncology, pediatric care)
- Mobile medical units
- Telemedicine initiatives
- Any other health care initiatives as may be approved by the CSR committee.

4. Eligible Institutions-

Funding may be provided to:

- Government hospitals
- Registered charitable hospitals
- Trusts/Societies/Section 8 Companies registered under CSR rules
- Medical institutions with proven track record
- Any other medical establishments or institutes as may be considered fit by the CSR committee

The hospital must:

- Be registered under applicable laws
- Provide utilization certificate
- Provide impact reporting
- Not distribute profits to members

5. Due Diligence Requirements-

Before funding, the Company shall:

- Verify legal registration and CSR-1 (if applicable)
- Review financial statements (last 2–3 years)
- Review utilization history (if previously funded)
- Obtain project proposal with budget breakdown
- Such other action as may be considered necessary.

6. Funding Mechanism

- Funds shall be disbursed directly to the hospital/institution.
- Tranche-based disbursement linked to milestones may be adopted.
- Utilization certificate and impact report required.
- Such other action as may be considered necessary.

7. Monitoring & Reporting

- Periodic review by CSR Committee
- Site visits where feasible
- Annual impact assessment (if threshold met under CSR Rules)
- Disclosure in Board's Report, as applicable.

II. Sammaan Capital Limited -Health Care Policy (continued) -PART B – INDIVIDUAL PATIENT FUNDING PROGRAM

1. Objective

The objective of this Policy is:

- To provide financial assistance to financially constrained individuals for medical treatment.
- To reduce financial hardship due to hospitalization, surgery, or life-threatening illness.
- To support preventive and life-saving healthcare interventions.
- Healthcare support will prioritize financially constrained persons, ensuring fair and non-discriminatory access regardless of gender, religion, caste, or background.

2. Applicability-

This Program applies to: Individuals who are financially constrained (within the meaning of the definition of financially constrained person), requiring financial support for medical treatment at hospitals.

3. Eligible Medical Support

The Company shall prioritize life-threatening, critical, emergency, pediatric, and high-cost chronic illnesses where financial hardship prevents access to essential treatment. Financial assistance may be provided for critical illnesses including but not limited to:

- Critical surgeries
- Cancer treatment.
- Organ transplant support.
- Accident-related emergency care.
- Life-saving treatments.
- Treatment of rare diseases
- Chronic illnesses.
- Cardiac diseases requiring surgery (bypass, valve replacement), Cancer (chemotherapy, radiation, surgery), Stroke, Kidney failure (dialysis, transplant-related treatment), Liver failure, severe respiratory failure, major organ dysfunction, orthopedic surgeries (fractures, joint replacement in severe cases), Neurosurgery, Emergency abdominal surgery, Trauma and accident-related surgeries, Thalassemia (blood transfusion support), Hemophilia, Severe diabetes complications, Tuberculosis (drug-resistant cases), Autoimmune disorders requiring long-term treatment, Congenital heart defects, Neonatal ICU cases, Pediatric cancers, Cleft lip / palate surgery, Severe developmental medical conditions, any other illnesses not included above as may be considered by the CSR Committee.

Exclusions:

- Cosmetic procedures
- Treatment outside India (unless specifically approved)
- Political or religious healthcare activities
- Cosmetic or aesthetic procedures
- Fertility treatments (unless medically necessary)
- Experimental / unapproved therapies
- Lifestyle enhancement procedures
- Non-medical wellness treatments

The financial assistance may include payment for -

- Hospitalization expenses

- Surgery costs
- Critical care treatment
- Medicines and diagnostics tests
- Emergency procedures
- Life-saving devices
- Post-operative essential treatments
- Doctors' fees and nursing care.
- Any other costs not specifically mentioned above as may be required or incidental for the medical treatment in accordance with the objectives of this policy.

4. Eligibility Criteria for Patients

A patient must:

1. Be an Indian resident.
2. Is a financially constrained person.
3. Any other case on merit not included above which is consistent with the policy objectives.

Definition

Financially Constrained Person" means an individual who, in the assessment of the Company lacks adequate financial capacity to bear medical expenses of the treatment without undergoing substantial hardship or who is not sufficiently covered under any medical insurance or government-funded healthcare schemes or has no medical insurance and lacks adequate financial capacity to bear medical treatment cost or has annual family disposable income below twenty five lakhs per annum or families affected by job loss/unemployment, loss of business, or any other causes effecting substantial loss of income and inability to bear medical costs or lower middle class families or otherwise economically vulnerable person who are not able to meet the cost of treatment without substantial hardship.

5. Funding Limits

- Maximum assistance per patient: Rs 25,00,000/- (Rupees Twenty-Five Lakhs Only) per annum.
- Funding shall generally be paid directly to the hospital, not to the individual.

6. Approval Process – All payment shall be made under this policy in accordance with Company's existing process.

7. Mandatory Documents – Individual Patient Funding Cases

- Patient ID proof
- Income proof / declaration
- Hospital estimate
- Doctor recommendation/ treatment plans
- Treatment outcome records (where available and with patient consent)
- Declaration of no or inadequate insurance coverage
- Documentation for Company's internal process approvals

Mandatory Documents – Hospital Projects

- Registration certificate (if applicable)
- CSR-1 (if applicable)
- Last 2–3 years financials
- MoU/ Agreements
- Detailed project proposal
- Budget breakdown
- Disbursement vouchers and fund transfer records

- Equipment installation certificates, photographs, and commissioning reports
- impact assessment reports
- Utilization certificate (post disbursement)

All records shall be maintained in physical and/or electronic format for a minimum period of eight years from the date of completion of the project/disbursement. Personal data shall be handled in accordance with applicable data protection laws and the Company's policy.

8. Disbursement Mechanism

- Payments shall be made directly to the hospital for the benefit of the patient.
- No cash shall be paid to beneficiaries.
- Advance payment or reimbursement may be permitted based on documentation.
- Stage-wise payment may also be allowed (advance + final settlement).

Safeguards-

- No cash disbursements is permitted.
- All payment will be made directly to hospitals

9. Monitoring & Documentation

For Hospital Support:

- Periodic site visits (if feasible)
- Equipment usage report
- Beneficiary data

For Patient Funding: Applicants must submit:

- Income proof
- Aadhaar or ID proof
- Medical diagnosis & cost estimate
- Self-declaration of financial hardship

10. Budget Allocation

Annual CSR budget allocation shall be approved by the Board upon recommendation of the CSR Committee.

11. Transparency & Accountability-

Financial assistance will be backed by proper documentation and audit trail to reduces misuse and ensures regulatory compliance. It includes -

- Direct payment to hospitals will be made (no cash disbursement)
- Hospital utilization certificate required.
- CSR team to maintain patient database.
- Periodic impact reporting to CSR Committee.
- Annual CSR disclosure in Board Report.
- All healthcare CSR activities shall align with: Section 135 of the Companies Act, 2013, Schedule VII (Promoting Healthcare), Applicable CSR Rules and amendments

12. Privacy and confidentiality

The Company shall:

- Respect patient privacy
- Maintain confidentiality of medical records

- Avoid publicity without consent
- CSR support should uphold human dignity.

13. Grievance redressal

The Company shall establish a mechanism for handling queries, complaints, or appeals regarding healthcare CSR assistance. Applicants whose requests are rejected may submit additional documentation or request reconsideration in case of changed circumstances. All grievances shall be acknowledged within 7 working days and resolved within 30 days. The CSR Committee may designate an officer for grievance redressal.

14. Amendments

The Board or the CSR committee as the case may be, may amend this Policy based on regulatory changes or strategic priorities.