

Iberia Pharmaceuticals India Limited
CORPORATE SOCIAL RESPONSIBILITY POLICY

PREAMBLE

Pursuant to Section 135 of the Companies Act, 2013 (“Act”), read with Schedule VII to the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time (“CSR Rules”), Iberia Pharmaceuticals India Limited (“the Company”) has formulated this Corporate Social Responsibility Policy (“the Policy”).

The Company recognises its responsibility towards society and the environment and is committed to conducting its business in a responsible and sustainable manner. The Company shall undertake Corporate Social Responsibility (“CSR”) activities in accordance with the applicable provisions of the Act, Schedule VII, the CSR Rules and other applicable laws.

The Policy establishes the principles and framework for identification, selection, implementation, monitoring and reporting of CSR activities undertaken by the Company.

1. OBJECTIVE

1.1 The objective of this Policy is to establish a framework for the Company's CSR activities and to ensure that such activities are undertaken in a responsible, transparent and sustainable manner.

1.2 The Company shall endeavor to undertake CSR initiatives that contribute to the social, economic and environmental development of the communities and beneficiaries intended to be served.

1.3 The Company shall undertake CSR activities in the areas or subjects specified in Schedule VII to the Act, as amended from time to time.

2. APPLICABILITY

2.1 This Policy shall apply to all CSR activities undertaken by the Company pursuant to Section 135 of the Act and the CSR Rules.

2.2 The Policy shall be applicable to the Company and its CSR Committee, Board of Directors, management, employees and such implementing agencies as may be engaged for carrying out CSR activities, to the extent applicable.

2.3 CSR activities shall be undertaken only in accordance with the Act, Schedule VII, the CSR Rules and other applicable laws.

3. DEFINITIONS

3.1 “Act” means the Companies Act, 2013, including the rules made thereunder, as amended from time to time.

3.2 “Board” means the Board of Directors of Iberia Pharmaceuticals India Limited.

3.3 “CSR” means Corporate Social Responsibility as defined and governed by Section 135 of the Act and the CSR Rules.

3.4 “CSR Committee” means the Corporate Social Responsibility Committee constituted by the Board under Section 135 of the Act, wherever applicable.

3.5 “CSR Policy” or “Policy” means this Corporate Social Responsibility Policy of the Company.

3.6 “CSR Project/Programme” means a project or programme undertaken by the Company in accordance with the Act, Schedule VII and the CSR Rules.

3.7 “Implementing Agency” means an entity eligible to undertake CSR activities on behalf of the Company in accordance with the CSR Rules.

3.8 Words and expressions used but not defined in this Policy shall have the meanings respectively assigned to them under the Act, the CSR Rules, Schedule VII and other applicable laws, as amended from time to time.

4. CSR GOVERNANCE

4.1 Board of Directors

The Board shall have overall responsibility for ensuring compliance with the Company's CSR obligations under the Act and the CSR Rules.

The Board shall, inter alia:

- approve the CSR Policy;
- approve the annual action plan recommended by the CSR Committee;

- approve CSR projects and programmes in accordance with applicable law;
- ensure that the Company spends the prescribed CSR amount in accordance with Section 135 of the Act;
- satisfy itself regarding the utilisation of CSR funds;
- monitor the implementation of CSR activities; and
- make such disclosures and undertake such reporting as may be required under applicable law.

4.2 Corporate Social Responsibility Committee

The CSR Committee shall function in accordance with Section 135 of the Act and the CSR Rules and shall assist the Board in implementing the Company's CSR framework.

The CSR Committee shall, inter alia:

- formulate and recommend the CSR Policy to the Board;
- recommend amendments or modifications to the CSR Policy;
- formulate and recommend the annual action plan;
- identify and recommend CSR projects and programmes;
- recommend the amount of CSR expenditure;
- monitor the implementation of CSR projects and programmes;
- review the utilisation of CSR funds;
- review the progress and effectiveness of CSR activities; and
- perform such other functions as may be prescribed under applicable law or delegated by the Board.

5. CSR ACTIVITIES

5.1 The Company shall undertake CSR activities falling within the areas or subjects specified in Schedule VII to the Act, as amended from time to time.

5.2 CSR activities may include, inter alia:

- eradicating hunger, poverty and malnutrition and promoting health care, including preventive health care and sanitation;
- promoting education, including special education and employment-enhancing vocational skills;
- promoting gender equality, empowering women and supporting senior citizens and other disadvantaged groups;

- ensuring environmental sustainability, ecological balance and conservation of natural resources;
- protection of national heritage, art and culture;
- measures for the benefit of armed forces veterans and their dependants;
- contributions to eligible funds and institutions specified in Schedule VII;
- rural development projects;
- slum area development;
- disaster management, including relief, rehabilitation and reconstruction; and
- such other activities as may be included in Schedule VII from time to time.

5.3 The above activities are illustrative and shall be interpreted in accordance with Schedule VII as amended from time to time.

6. IDENTIFICATION AND SELECTION OF CSR PROJECTS

6.1 CSR projects and programmes may be identified by the CSR Committee, the management of the Company or through appropriate consultation with stakeholders and eligible implementing agencies.

6.2 While selecting CSR projects, the Company may consider:

- the needs of the intended beneficiaries;
- the potential social and environmental impact;
- sustainability and scalability;
- the Company's available resources;
- the capabilities and credentials of implementing agencies;
- geographical considerations; and
- the feasibility of monitoring and evaluation.

6.3 Preference may be given to the local area and areas around which the Company operates, to the extent practicable and in accordance with applicable law.

7. ANNUAL ACTION PLAN

7.1 The CSR Committee shall formulate and recommend to the Board an annual action plan for each financial year in accordance with applicable law.

7.2 The annual action plan shall include, inter alia:

- the list of CSR projects or programmes approved to be undertaken;
- the manner of execution of such projects or programmes;
- the modalities of utilisation of CSR funds;
- implementation schedules;
- monitoring and reporting mechanisms;
- details of need and impact assessment, wherever applicable; and
- such other matters as may be prescribed under the CSR Rules.

7.3 The Board may alter the annual action plan during the financial year in accordance with applicable law and based on the recommendation of the CSR Committee.

8. IMPLEMENTATION OF CSR ACTIVITIES

8.1 CSR activities may be undertaken directly by the Company or through eligible implementing agencies in accordance with the CSR Rules.

8.2 The Company may undertake CSR projects independently or in collaboration with other companies or organisations where permitted under applicable law.

8.3 Before appointing an implementing agency, the Company may undertake appropriate due diligence regarding its eligibility, credentials, experience, financial capacity and ability to implement the proposed CSR project.

8.4 Appropriate agreements, project documents, milestones, utilisation requirements, reporting obligations and monitoring mechanisms may be established with implementing agencies.

9. CSR EXPENDITURE

9.1 The Company shall endeavour to spend the prescribed CSR amount in each financial year in accordance with Section 135 of the Act and the CSR Rules.

9.2 CSR expenditure shall be incurred only on activities qualifying as CSR under applicable law.

9.3 The calculation of the amount required to be spent on CSR shall be made in accordance with the Act and the CSR Rules.

9.4 Administrative overheads, capital assets, surplus arising from CSR activities and other CSR expenditure shall be dealt with in accordance with the CSR Rules.

9.5 Any unspent CSR amount shall be dealt with in accordance with Section 135 of the Act and the CSR Rules, including the provisions applicable to ongoing projects.

10. MONITORING AND EVALUATION

10.1 The CSR Committee shall monitor the implementation of CSR projects and programmes and review the utilisation of CSR funds.

10.2 Monitoring may include:

- periodic progress reports;
- financial utilisation statements;
- utilisation certificates;
- project milestones;
- site visits;
- beneficiary feedback;
- performance indicators;
- independent evaluation; and
- impact assessment, wherever applicable.

10.3 The CSR Committee shall report the progress of CSR activities to the Board at such intervals as may be considered appropriate or prescribed under applicable law.

11. IMPACT ASSESSMENT

11.1 Where impact assessment is applicable under the CSR Rules, the Company shall undertake such assessment in the manner prescribed under applicable law.

11.2 The Company may also undertake independent or voluntary impact assessment of CSR projects where considered appropriate by the Board or the CSR Committee.

11.3 The findings of impact assessment may be considered while designing and selecting future CSR projects.

12. SURPLUS ARISING FROM CSR ACTIVITIES

Any surplus arising out of CSR activities shall not form part of the business profits of the Company and shall be dealt with in accordance with the CSR Rules and other applicable provisions of law.

13. ACTIVITIES NOT CONSIDERED AS CSR

The Company shall not treat as CSR expenditure any activity excluded under applicable law, including, to the extent prescribed:

- activities undertaken in pursuance of the normal course of business of the Company, except as specifically permitted by law;
- activities undertaken outside India, except as specifically permitted under the CSR Rules;
- contributions to political parties;
- activities benefitting employees of the Company, except as specifically permitted under applicable law;
- activities undertaken as sponsorships for deriving marketing benefits for products or services; and
- activities undertaken merely to fulfil any other statutory obligation under any law in force in India.

14. CSR IMPLEMENTATION PARTNERS

14.1 Where CSR activities are undertaken through an implementing agency, the Company shall ensure that the agency satisfies the eligibility requirements prescribed under the CSR Rules.

14.2 The Company may require implementing agencies to provide periodic progress reports, utilisation certificates, audited statements, photographs, supporting documents and such other information as may be considered necessary.

14.3 The Company shall monitor the performance of implementing agencies and may take appropriate corrective action where CSR funds are not utilised for the approved purpose.

15. RECORDS AND DOCUMENTATION

The Company shall maintain appropriate records relating to CSR activities, including, as applicable:

- CSR Policy;
- annual action plans;
- CSR Committee and Board approvals;
- project proposals;
- agreements with implementing agencies;

- budgets and expenditure records;
- utilisation certificates;
- progress reports;
- impact assessment reports;
- statutory filings and disclosures; and
- other records required under applicable law.

16. REPORTING AND DISCLOSURES

16.1 The Company shall make CSR disclosures and reporting in accordance with the Act, the CSR Rules and other applicable requirements.

16.2 The Company shall include the prescribed CSR disclosures in its Board's Report.

16.3 The Company shall place the CSR Policy and such other CSR information on its website as may be required under applicable law.

16.4 The Company shall make such statutory filings with the Ministry of Corporate Affairs, Registrar of Companies or other authorities as may be prescribed.

17. TRANSPARENCY AND ACCOUNTABILITY

The Company shall endeavour to maintain transparency and accountability in the identification, approval, implementation, monitoring and reporting of CSR activities.

The CSR Committee and the Board may require additional information, documentation, certification or reports in relation to CSR projects as considered necessary.

18. REVIEW AND AMENDMENT

18.1 This Policy shall be reviewed periodically and whenever there is any change in the applicable provisions of the Act, Schedule VII, the CSR Rules or other applicable laws.

18.2 The Policy may be amended, modified, substituted or replaced by the Board on the recommendation of the CSR Committee, in accordance with applicable law.

18.3 In the event of any conflict between this Policy and applicable law, the provisions of applicable law shall prevail to the extent of such conflict.

19. EFFECTIVE DATE

This Policy shall be effective from February 24, 2026, being the date of its re-adoption and approval by the Board of Directors of the Company.

20. VALIDITY AND ENFORCEABILITY

If any provision of this Policy is held to be invalid, unlawful or unenforceable, such provision shall be deemed to be severed from the Policy to the extent of such invalidity, unlawfulness or unenforceability, without affecting the validity and enforceability of the remaining provisions.

Particular	Details
Policy Name	Corporate Social Responsibility Policy
Regulatory Reference	Section 135 of the Companies Act, 2013, Schedule VII and Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time
Effective Date	24-Feb-2026
Re-adopted / Approved On	24-Feb-2026
Version	Version 2.0
Drafted By	CS & Legal Department
Approved By	Board of Directors