

PERNOD RICARD INDIA PRIVATE LIMITED CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Approved by: Board of Directors on September 15, 2025

CONTENTS

S. No	Contents	Page No.
1.	Introduction	3
2.	Policy Framework and Purpose	3
3.	PRIPL's CSR Philosophy	3
4.	Focus Areas	4
5.	Mode of Implementation	5
6.	Governance Structure	6
7.	CSR Expenditure	8
8.	CSR Partnership and Programme Management Framework	9
9.	Disclosure	11
10.	Review of CSR Policy	11

1. INTRODUCTION:

Pernod Ricard India Private Limited (“**PRIPL**” or “**Company**”) is a leading multinational alcohol-beverage company committed to delivering quality products across India.

PRIPL’s CSR vision is to transform communities and accelerate local development by fostering sustainable and inclusive growth for all. Our mission is to restore ecosystems, and enhance well-being, while embracing diversity and driving solutions that create resilient and thriving communities. PRIPL drives meaningful change by actively engaging stakeholders and recognizing the importance of sustainable and holistic practices for impactful contributions.

2. POLICY FRAMEWORK AND PURPOSE:

PRIPL’s Corporate Social Responsibility (“**CSR**”) policy (“**Policy**”) has been developed in consonance with Section 135 and Schedule VII of the Companies Act, 2013 (“**the Act**”) and in accordance with Companies (Corporate Social Responsibility Policy) Rules, 2014 (“**Rules**”) as amended from time to time. It shall apply to all CSR projects / programmes / activities undertaken by the Company as per liberal interpretation of activities listed in Schedule VII of the Act as amended from time to time.

The Policy aims to establish guidelines for implementing effective, CSR programmes/projects/ activities that positively contribute to society. It aligns with the Company’s vision, detailing the mechanisms and strategies for executing CSR programmes/projects.

3. PRIPL’S CSR PHILOSOPHY:

PRIPL’s vision is to transform communities and accelerate local development. With this at the core, PRIPL is committed to creating meaningful, lasting impact, and becoming an important stakeholder in local development. Through our CSR strategy we create sustainable outcomes and a shared future of dignity, prosperity, and opportunity for the communities we serve.

We believe that,

- (a) As a responsible organization, our programmes are aligned to community needs, national priorities, sustainable development goals, and company’s development priorities focusing sustainability, inclusivity and empowerment.

- (b) Our success is tied to the success of the communities where we operate, so we are committed to working for their development and realizing shared goals.
- (c) We are driven by a belief in inclusive growth, where no one is left behind. Our programmes prioritize the most marginalized, including women, youth, and vulnerable groups, with the intent to build resilient and self-reliant communities.
- (d) We measure our impact not just in numbers but in lives changed. Our focus is on long-term engagement rather than short-term outputs, guided by data, community feedback, and continuous learning.

4. **FOCUS AREAS:**

- (a) PRIPL is committed to prioritizing its CSR initiatives in the local areas surrounding its business operations, and beyond. Our goal is to create lasting impact and contribute to the region's overall development by supporting causes that benefit communities nationwide.
- (b) The CSR focus areas of PRIPL are aligned with the following:
 - (i) PRIPL's CSR priorities (as outlined in table below), including those of the global sustainability and responsibility pillars as guided by PRIPL's ultimate holding company;
 - (ii) Identified needs of the local community; and
 - (iii) National priorities set by NITI Aayog and United Nations Sustainable Development Goals (SDGs).

Provided that all the projects/programmes/activities undertaken will be within Schedule VII of the Act and Rules thereunder, as amended from time to time.

- (c) The CSR programmes/ projects/ activities supported by PRIPL are categorized under the following themes:

S. No.	Thematic Area	Description
1.	Water, Agriculture, Livelihood (WAL) and Environment Conservation	Projects focused on water conservation, fostering water-resilient communities, promoting sustainable and advanced agricultural practices, augmenting livelihood opportunities. Promoting environmental conservation, addressing climate change, protecting and preserving biodiversity, and rejuvenating degraded land, and afforestation.
2.	Diversity & Inclusion (D&I)	Supporting diverse communities and promoting inclusion by initiatives on enhancing educational opportunities, developing skills, promoting sports, and preserving cultural heritage.
3.	Quality Healthcare and Water, Sanitation and Hygiene (WASH)	Initiatives aimed at improving access to quality healthcare and promoting water, sanitation, and hygiene (WASH) practices to improve overall well-being.
4.	Social Transformation & Innovation (ST&I)	Supporting innovation and incubation of scalable innovation aligned to national and local agenda. Develop and build entrepreneurial capacities of local community-based organizations.

In addition to the above, PRIPL may take any other activity, in alignment with Schedule VII of the Act and Rules.

5. **MODE OF IMPLEMENTATION**

PRIPL shall implement its CSR projects/programmes through one or a combination of the following:

- (a) Directly by PRIPL.
- (b) Through “Pernod Ricard India Foundation” (PRIF), wholly owned subsidiary company established by PRIPL, under section 8 of the Act.
- (c) a company established under [section 8](#) of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and

- approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company.
- (d) through a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government.
 - (e) through any entity established under an Act of Parliament or a State legislature.
 - (f) a company established under [section 8](#) of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.
 - (g) Collaboration with other companies for undertaking CSR projects or programmes in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes.
 - (h) Company may engage organisations (including international organisations) to design, monitor and evaluate the CSR projects or programmes as well as for capacity building of their own personnel for CSR.

6. GOVERNANCE STRUCTURE

PRIPL's CSR structure has been designed to ensure efficient implementation through clearly defined roles and responsibilities. The Company will adopt a three-tier governance framework as outlined below:

- (a) **Board:** Board shall perform functions as required under the Act, including constituting a CSR Committee consisting of at least two directors. The functions of the Board shall inter-alia include the following:
 - (i) Approve the CSR Policy of the Company after considering the recommendations given by the CSR Committee.
 - (ii) Ensure that the latest CSR Policy of the Company is placed on the Company's website and disclose the contents of such policy in the Boards' report.
 - (iii) Ensure that the Company undertakes CSR programmes/projects/activities in compliance with this Policy.
 - (iv) Approve the annual action plan and thereafter may alter the same at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

- (v) Ensure that the statutory specified amount is spent by the Company. If the entire amount is not spent within the financial year, the Board shall in its report specify the reasons for not spending the said amount and transfer the unspent CSR amount as per **CSR Expenditure** section of this Policy.
 - (vi) The Board shall satisfy itself that the funds so disbursed have been utilized for purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify the effect.
 - (vii) Approve annual report on CSR programmes at the end of each financial year.
 - (viii) For ongoing projects, the Board shall monitor implementation against the approved timelines and yearly budget allocation and may make adjustments as needed to ensure smooth execution within the permissible timeframe.
 - (ix) The Board shall ensure that the administrative overheads shall not exceed five percent (5%) of total CSR expenditure of the Company for the financial year.
 - (x) If the Company spends an amount in excess of mandated amount under the Act, such excess amount may be set off against the requirement to spend up to immediate succeeding three financial years.
 - (xi) Any other functions that may be required under the Act and the rules made thereunder.
- (b) **CSR Committee of the Board:** The functions of the CSR Committee shall inter-alia include the following:
- (i) Formulate and recommend CSR Policy to the Board.
 - (ii) Review and recommend the CSR annual action plan including amendments (if required) along with reasonable justification to the Board.
 - (iii) Review and recommend the CSR projects, programmes, and activities to the Board.
 - (iv) Periodically review/monitor the CSR Policy/projects/programmes/activities to be undertaken by the Company. The CSR Committee will then make recommendations to the Board.
 - (v) Take appropriate measures to ensure effective implementation of CSR projects/programmes successfully.
 - (vi) Recommendation for the Annual Report on CSR programmes/projects/ activities to the Board.
 - (vii) To review and submit impact assessment reports to the Board.
 - (viii) Such other functions as mandated by the Board of Directors or as mandated under the Act and the rules made thereunder.

The CSR Committee shall meet at least twice a year to perform such functions as provided above.

(c) **CSR Leadership**

The functions of the CSR leadership of the Company shall inter-alia include the following:

- (i) Review and monitor **end-to-end lifecycle of CSR projects**—from identification and selection to execution and impact assessment.
- (ii) Work closely with the CSR Committee and periodically present status on CSR Programmes/ Projects and progress to the CSR Committee and the Board of the Company.
- (iii) Provide strategic and operational guidance to ensure effective on-ground implementation of CSR programmes.
- (iv) Ensure adherence to CSR related regulatory requirements and internal reporting standards, thereby upholding transparency, compliance, and accountability.

The CSR leadership shall review and monitor the CSR projects/ programmes/ activities on a continuous basis.

7. **CSR EXPENDITURE:**

- (a) It shall be Company's endeavor to spend in each financial year, at least two per cent of its average net profits (calculated as per Section 198 of the Act) accrued during the three immediately preceding financial years on CSR programmes in pursuance of this Policy.
- (b) In the event that the amount indicated above is not spent in its entirety in that financial year despite best efforts, the reasons thereof will be specified in the Board Report, and unless such unspent amount relates to any on-going project, it shall be transferred by the Company to any fund included in schedule VII of the Act within a period of six months of the expiry of that financial year. However, if the unspent amount relates to an ongoing project, it shall be transferred within 30 (thirty) days from the end of financial year to a separate bank account of the Company, to be designated as the "Unspent CSR Account".
- (c) For each financial year, the CSR Committee of the Board shall formulate and recommend to the Board an annual action plan specifying:
 - (i) identified projects/programmes to be undertaken in areas or subjects specified in Schedule VII of the Act;

- (ii) proposed manner of execution of the same along with budgets allocated for such projects/programmes;
 - (iii) the modalities of utilisation of funds and implementation schedules for the projects or programs
 - (iv) Monitoring and reporting mechanism for the projects/programmes;
 - (v) Details of need and impact assessment (if applicable) for the projects/programmes.
- (d) In an event where the Company makes any surplus or profit from pursuing its CSR project/programmes, these will not form part of the business profit but will, instead, be deployed back into the same CSR project/ programme/ activity.
- (e) The surplus if not deployed back into the same project/ programme/ activity shall be transferred to the unspent CSR Account and spent in pursuance of CSR Policy and annual action plan of the Company 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.
- (f) Any capital asset created or procured as a part of the CSR contribution shall be held by:
- (i) a company established under Section 8 of the Act, or a registered public trust or registered society, having charitable objectives and a valid CSR registration number; or
 - (ii) the beneficiaries of the CSR project, in the form of self-help groups, collectives, or other such entities; or
 - (iii) a public authority.

8. CSR PARTNERSHIP AND PROGRAMME MANAGEMENT FRAMEWORK

(a) Partner Selection:

PRIPL can execute its CSR projects and programmes either directly or through partners. When selecting the partners, PRIPL shall carry out a thorough due diligence to assess their fitment. This includes, but is not limited to technical and financial credibility, sector specific experience, track record, statutory compliance and other relevant criteria.

Due Diligence: Due diligence of shortlisted partners shall be conducted based on documents received from organization or on ground visit or both. PRIPL shall obtain the necessary documents from the shortlisted partners to facilitate the due diligence process.

(b) Programme Selection & Evaluation:

PRIPL may identify or select programmes in any of the following routes:

- (i) Company inviting proposals for different sectors.
- (ii) Proposals submitted directly by implementation/ execution vendors/ agencies or non-government/ non-profit organisations.
- (iii) Projects being co-created by PRIPL and partners based on identified local needs and gaps.

(c) Programme Evaluation:

Programme proposals will be assessed based on clearly defined selection criteria to evaluate their relevance, experience, feasibility,

alignment, sustainability, monitoring and reporting mechanism, risk assessment and potential for impact.

(d) Monitoring, Evaluation & Reporting Mechanism:

PRIPL shall ensure thorough monitoring and reporting of its CSR projects/programmes/ activities as specified in the annual action plan in the following manner:

- (i) Monitoring and Review Mechanism: All CSR programmes/ projects/ activities shall undergo periodic reviews, these include, but are not limited to:
 - a) Internal Reviews – monthly, annual, etc. focusing on key milestones, performance indicators, fund utilization, and management of capital assets.
 - b) Stakeholder interactions- regular engagement with internal teams, implementing partners, community members and representatives to ensure accountability and share learnings for continuous improvement.
 - c) Regular field visits - PRIPL's CSR team member(s) will conduct field visits to monitor project implementation and progress.
- (ii) In addition, monitoring and review, select CSR programmes will be subject to:
 - a) Impact Assessments: The Company shall undertake impact assessments, through an independent agency, of its CSR

Programmes/ Projects
having outlays of one crore rupees or more or any other
programme/ projects identified by the

Company, and which have been completed not less than one year before undertaking the impact assessment. The Company, after undertaking impact assessment, may book the expenditure towards CSR for that financial year, which shall not exceed two percent (2%) of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is higher.

- b) Financial and programmatic audits: Some CSR programmes/ projects may be subject to additional programmatic/ financial audits as per management's decision.

9. **DISCLOSURE**

PRIPL shall make disclosure of its CSR Policy, programmes/projects/ activities approved by the Board, as well as the composition of the CSR Committee of the Board and such other details, as required under the Act from time to time on the Company's website.

10. **REVIEW OF CSR POLICY**

This CSR Policy may be reviewed and revised as and when required by PRIPL.

Any subsequent amendment/modification in regard to CSR provisions in the Act/Rules notified by the Ministry of Corporate Affairs, shall automatically apply to this Policy. In case any provision(s) of this CSR Policy is contrary to or inconsistent with the provisions of the Act and the Rules framed thereunder ("Statutory Provisions"), the Statutory Provisions shall prevail.