

DONATION/CORPORATE SOCIAL RESPONSIBILITY(CSR) POLICY 2023-2024

1. Preamble:

As a responsible corporate citizen, it is felt desirable that Bank should actively contribute to the social wellbeing of the society. Bank has large resources in the form of over 9100 branches and over 70000 employees, even in the remote rural areas, which can be leveraged for enhancing the development of the well-being of less fortunate/under-privileged members of the society. Besides, helping in social uplift, it will also help the bank to enhance its image as a brand that believes in inclusive growth. In view of the above, the Bank proposes to formulate and put in place its donation/CSR Policy. The policy will provide a structured framework for the donation/CSR activities to be conducted by the Bank. The Policy shall be reviewed and updated on an annual basis.

It may also be stated that the directives of RBI vide its communication No. 237/2205-06 DBOD.No.Dir.BC 50/13.01.01/2005-06 dated 21st December, 2005 are voluntary in nature. Also, since the Public Sector Banks are not registered under the Companies Act, the provisions of Sec. 135 of Companies Act, 2013 on CSR are not applicable for the Bank.

The donation/CSR activity is proposed to be undertaken by the Bank as a pro-active and voluntary step for development of the well-being of less fortunate/under-privileged members of the society, keeping in view the philosophy of giving back to the society.

2. Policy Statement:

Making seamless efforts to maximize the social outreach through both financial and non financial resources to less fortunate/under-privileged members of the society to enhance their standard of living.

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3. Objectives:

- i. Strive for economic development that positively impacts the society at large with minimal resource footprint.
- ii. Embrace responsibility for sustainable growth and integrate donation/CSR in its business development strategies with values & Bank's commitment to society.
- iii. CSR shall be used as a tool to invoke participation in the social causes for addressing larger issues viz. poverty, hunger, healthcare, skill updation, community development.
- iv. Involve its staff members as well in discharging its social responsibility to make a greater sustainable impact.

4. Undertaking Donation/CSR Activity:

- i. Bank will engage directly or through Union Bank Social Foundation (UBSF) or any reputed Government as well as non-Government Organizations, voluntary agencies, civil society organizations, not for profit companies, community-based organizations, Trusts/Missions, Self Help Groups, Academic Institutes for furthering the cause within the domain of CSR activities. Union Bank Social Foundation is a Trust founded by the Bank which is Registered under Indian Trust Act, 1882 and having approval under Section 80G(5)(vi) of the Income Tax Act, 1961.
- ii. Donations should be made only to Institutions/NGOs qualifying under tax exemption having requisite certificate under Section 80 (G) /Section 35 AC of Income Tax Act.
- iii. Donations to Institutions having distinct Caste/ religious/ communal bias and or political overtones should not be considered. However, donations to reputed Institutions/organizations etc. engaged in community development programs and conducting activities in larger interest of general public e.g. Hospital, Health care, Education etc. can be considered on case to case basis.
- iv. Donations as contribution towards corpus funds should be granted in very exceptional and deserving cases like for augmentation funds to Government Developmental/ Agencies for carrying out social welfare programs.
- v. Donations normally should not be given to individuals except for creation of endowment funds for awarding scholarships to meritorious and economically weaker students pursuing higher/ technical/ management education at reputed institutions like IIMs, IITs, NIBM etc. and for nurturing talents in excelling in Sports activities at National level. Such donations should be granted on extremely

selective basis.

- vi. Donation/CSR activity cannot be undertaken which gives rise to any sort of conflict of interest. The activities which directly benefit only the serving / retired employees / directors and their immediate relatives (as per the definition of SEBI guidelines) shall not be considered for extending the financial assistance under donation/CSR. Further the entities where the serving / retired staff / Executives / Directors are having management control / controlling stake shall not be eligible to be considered under donation/CSR.

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5. Focus Areas:

Historically, efforts undertaken in our country for the benefit of disadvantaged, marginalized and excluded sectors of the society have succeeded in only partially addressing the problems in isolated areas. The glaring imbalances still remain requiring urgent attention. As a result, the need for adopting a comprehensive outlook has arisen. Taking into consideration the complexities, divergence of areas, literacy, financial status, patterns both geographical and societal, inter-alia, the following broad sectors have been identified by the Bank as focus areas within India under Bank's donation/CSR activities:

- Physical/Mental Disability.
- Rural Development.
- Health Care.
- Education and skill development (the bank shall endeavor to offer financial assistance for beneficiaries of its skill development programs for setting up their own business).
- Girl Child & Women Empowerment.
- Development of Adarsh Grams/Digi-Gaon by strengthening infrastructure, sanitation, basic amenities, conveniences, towards community development, financial literacy etc. (the bank shall provide all banking services in the identified village and also use this as an opportunity to fulfill its obligations under various RBI guidelines /Govt. sponsored schemes)
- Natural calamities, disasters.
- Environment Protection.
- Protection of national heritage, monuments at historic places, centers of art and culture.
- Promotion of digital payments as an eligible activity under donation/CSR activities so as to enable procurement of POS devices by banks from donation/CSR funds. • All other activities specified in schedule VII to the Companies Act, 2013 will also be covered as eligible activities under donation/CSR.
- Primacy is accorded to supporting national priorities declared by Government of India time to time.

Exclusions:

Following activities will not be undertaken as part of donation/CSR of the Bank:

- Bank will not advocate or support any single religion, caste, creed etc. and shall maintain secular business relationship with all.
- Bank will not support political party sponsored projects for donation/CSR development.

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- Bank will not consider any proposal which seeks to benefit only the employees of the Bank and their family members.
- No donations shall be made to benefit any official of the Bank or relative of the official of the Bank. The definition of relative shall be as prescribed under SEBI guidelines (list annexed as per Annexure 'A')

6. Board Level Committee for approval of donation/CSR:

6.1 Composition, Quorum and frequency of meeting

- 6.1.1. Bank has constituted a Stakeholder Relationship Committee. The composition of the Committee is as follows:
- a. Managing Director & CEO
 - b. Executive Directors
 - c. One Part-Time Non-Official Director nominated under Section 9(3)(h) of the Act*.
 - d. One Shareholder Director elected under Section 9(3)(i) of the Act*
- *The Banking Companies (Acquisition & Transfer of Undertakings) Act, 1970.

6.1.2. Members of Stakeholder Relationship Committee under Part-Time Non-Official Director and Shareholders Directors category shall be rotated on a yearly basis.

6.1.3. Quorum of meeting shall be three members.

6.1.4. The meeting should be held at least once in a quarter.

6.1.5. Convener of the meeting will be General Manager / Vertical Head SSD & Corporate Communications.

6.2 Scope

6.2.1. Formulating and recommending to the Board of Directors the donation/CSR Policy and indicating the activities to be undertaken.

6.2.2 Approval of projects requiring outlay beyond Rs.10 lakhs either to Union Bank Social Foundation Trust or such other entity/organization as approved by the Committee within the overall guidance laid down in this policy.

6.2.3. Reviewing usage of delegated authority by GM/ED/MD&CEO on quarterly basis.

6.2.4. Reviewing performance of Union Bank Social Foundation Trust on quarterly basis.

6.2.5. Minutes of the Stakeholder Relationship Committee shall be presented to Board on quarterly basis.

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7. Union Bank Social Foundation Trust:

- 7.1. Union Bank Social Foundation (UBSFT) is a Trust founded by the Bank and Registered under the Indian Trust Act, 1882 and got registered under Section 12A of Income Tax Act 1961 having tax exemption approval under Section 80G(5)(vi) of the Income Tax Act, 1961. The Trust has a separate Board of Trustees comprising of up to 15 trustees with MD & CEO as ex officio Chairman, all Executive Directors as ex-officio Vice Chairman. The other members of the trust board including independent trustee are to be nominated by MD & CEO.
- 7.2. The Board of Trustees examine the projects received from various offices of Union Bank of India (pan India) and if found acceptable on the basis of need, cost vs. donation sought and feasibility of implementation & approve the same.
- 7.3. The Board of Trustees meet on a quarterly basis and review the sanctioned projects as also approves new projects, if any, based on the feasibility and availability of funds.

8. Budget for CSR:

As per Reserve Bank of India directives, vide its communication No. 237/2205-06 DBOD.No.Dir.BC-50/13.01.01/2005-06 dated 21st December, 2005:

- 8.1. Bank may make Donations during a financial year aggregating upto one percent of published profits of the Bank for the previous year. In case of loss, the Bank can spend up to Rs.5.00 lac per annum.
- 8.2. The contributions made by Bank to Prime Minister's Relief Fund and subscriptions to Professional Bodies/Institutions like Indian Bank's Association, National Institute of Bank Management, Indian Institute of Banking and Finance, Institute of Banking Personnel Selection and Foreign Exchange Dealer Association of India are exempted from the above ceiling.
- 8.3. The unutilized portion of the limit of one percent will not be carried forward to the next year.
- 8.4 In view of the aforesaid RBI guidelines, we propose that Annual Budget for

Donation/ CSR be limited to 1 % of published net profits of the Bank for the previous year or upto Rs.5.00 lacs per annum in case of loss.

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9. Funding, Selection and Monitoring Process:

9.1 Delegated Authority for approval of donation/CSR for the Project/Programme:

Sr.no	Amount	Delegatee
1	Up to Rs.10.00 lakh	General Manager / Vertical Head,SSD & Corp.Comm.Dept.
2	Above Rs.10.00 lakh to Rs.25.00 lakhs	Executive Director
3	Above Rs.25.00 lakh to Rs.50.00 lakhs	Managing Director & CEO
4	Above Rs.50.00 lakhs	Stakeholder Relationship Committee of Directors

9.2 Union Bank Social Foundation (UBSFT) or the Bank directly, will receive requests for funding of projects from pan India. The CEO of foundation (UBSFT) / General Manager / Vertical Head SSD & Corporate Communication will evaluate the proposals received under the Bank's focus areas and the projects will be prioritized by assessing their likely impact. The parameters for evaluation are stated in Annexure B, B1 & B2. The proposals will be recommended to respective delegated authority for approval.

9.3 Discretion shall be exercised judiciously to ensure that assistance is extended for worthy causes to well established institutions/NGOs with proven track record, for socially oriented projects. It should be ensured that donations are invariably made directly to institutions/NGOs without any involvement of agents/middlemen/consultants.

9.4 Institution should preferably be registered as a Society or a Charitable Trust. Donations should be made only to institutions/NGOs eligible for tax exemption, i.e. institution/NGOs should have income-tax exemption certificate under Section 80 (G)/35 of I.T. Act, so that the Bank can claim tax exemption.

9.5 Donations to institutions having their own resources and / or can raise funds, on their own, to meet costs of their project should be generally avoided.

9.6 As far as possible donations are to be granted for a range of activities and should have wide outreach throughout the geographies covering Bank's network in the country while according preference to Bank's Lead Districts.

9.7 Institutions with meager resources should be given preference.

9.8 No Donations to be made to individuals. However, in exceptional circumstances donations to individuals in deserving cases may be approved by the Board.

9.9 The monitoring of end use of funds will be done by the Regional Office, under whose jurisdiction the beneficiaries are impacted. The Corporate Office, will receive progress reports on quarterly basis, till the time the project is fully implemented. The quarterly reports on progress of various projects shall be placed to the Stakeholder Relationship Committee of Board for review in its quarterly meetings.

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10. Utilization & Release of Funds:

10.1 Disbursements will be ensured through Regional Offices/FGMOs. The approved Funds will be directly remitted to the Institutions/Vendors/NGOs based on the recommendation of FGM/RM or remitted to the respective Regional Offices/FGMOs as the case may be. FGMO, P&D-In-Charge will monitor the utilization of funds donated and ensure proper end use of funds which are approved either directly or through Regional Offices/Branches depending on the location. The FGMO shall get the donated assets/activities inspected through its Official or by Regional Office/Branch Officials. For projects relating to construction work, the assessment is to be done by Bank's Panel Architect and his/her certificate, certifying the estimate, actual expenses incurred etc. will be obtained.

10.2 FGMOs/Regions, which has made disbursement shall monitor the utilization of funds donated and ensure proper end use of funds for the purpose for which it is sanctioned. The FGMO/ Region shall get the assets created under donation inspected through a Senior Official of the Bank and shall keep the inspection report on record.

10.3 FGMO/ Region shall ensure that the Donee exhibits the Bank's name/logo on the premises where donated assets are kept and/or on donated assets itself.

10.4 The FGMO/Region shall ensure to obtain -

- Receipt for donated amount from Donee.
- Attested copy of certificate under section 80 (G) / 35 of Income Tax Act to claim exemption if applicable.
- Certificate of the Chartered Accountant of the Donee, certifying the end use of donated funds.
- In case of single donation to an organization exceeding Rs.25.00 lacs, the Zone/Region shall ensure to obtain verification of end use of donated funds through inspection by a Senior Bank Official.
- It should be ensured that donations are invariably made directly to Institutions/ NGOs without any involvement of agents/middlemen/consultants.

- FGM will ensure involvement of maximum number of staff wherever possible to ensure sustainability of efforts.

11. Accounting Procedure:

The expense under donation/CSR will be booked on actual payment basis and not on accrual basis.

12. Impact Analysis :

The Bank will conduct an impact analysis of its all donation/CSR activities involving an expenditure of above Rs.25 lakhs once in a period of three years through an independent agency.

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13. Terms of the Policy & Residual Issues:

- The Policy shall supersede the existing Donation/CSR Policy.
- The Policy shall take effect immediately and shall be subject to review annually.
- In case of any ambiguity/contradiction/clarification in regard to this Policy, the Managing Director & CEO shall be the final authority to resolve such issue.

This Policy shall be valid up to March 2024 and its continuity may be extended for a further period not exceeding 3 months with specific approval of the Managing Director & CEO.

(G.B.MISHRA)
GENERAL MANAGER

List of Annexures

- Annexure A - List of Relative as per SEBI Guidelines**
- Annexure B - Brief on Proposal/Project/Donation etc.**
- Annexure B-1 - Check List for Proposals seeking Donations.**
- Annexure B-2 - Due Diligence Report.**

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Union Bank of India Annexure 'A'

List of Relative as per SEBI guidelines:

Relative includes the following :

1. Member of HUF
2. Spouse
3. Father (including step-father)
4. Mother (including step-mother)
5. Brother (including step-brother)
6. Sister (including step-sister)
7. Son (including step-son)
8. Daughter
9. Son's Wife
10. Daughter's Husband

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