

# *Coca-Cola India*

**Coca-Cola India Private Limited**  
**CSR Policy 2022**

## **Purpose:**

The purpose of this Policy is to outline the approach of company on CSR

## **Background:**

In conformity with requirements laid down under The Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as “the **CSR Rules**”) issued by the Ministry of Corporate Affairs (“MCA”), under Section 135 of the Companies Act, 2013 (“**the 2013 Act**”) a CSR Policy, was adopted by the Board of Directors on June 26, 2014. Subsequently, over a period, the Board adopted revised CSR Policies to conform to the notifications issued by MCA. The sweeping amendments made by MCA to the 2013 Act, vide the Companies (Amendment) Act, 2020, (“CAA, 2020”), and CSR Rules vide the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (“CAR 2021”), were incorporated in the Policy adopted by the Board on June 28, 2021. This Policy was adopted by the Board on **June 27 2022**, on the recommendation of CSR Committee. The Policy can be downloaded from the website of Company at [www.coca-colaindia.com](http://www.coca-colaindia.com)

## **Preamble:**

Coca-Cola India Private Limited (hereinafter referred to as “the company”), recognizes the impact it has on communities in which it operates and believes that it has a tremendous opportunity to change lives of these communities and aims to be a trusted partner contributing to the social, economic and environmental progress of India. As part of its dedicated approach to create economic opportunity in the communities in which it operates, the Company has been undertaking a series of initiatives that are locally relevant and has been partnering with various stakeholders including, Governments, NGOs, CSOs, authorised bottlers of The Coca-Cola company and the company’s customers, hospitals, district administration, farmers and others.

## **Objectives and approach on CSR:**

**Focus areas:** As a responsible corporate citizen, the company is committed to sustainable development and inclusive growth and has been focusing on a wide range of issues in relation to water, environment, healthy living, music, grass roots education, social advancement and promoting gender equality and empowerment of women. Over the years, the company has undertaken CSR Projects in areas of providing access to water, promoting education (including special education) and employment enhancing vocation skills, ensuring environmental sustainability and rural development projects.

Whilst the company will continue to primarily support activities in Schedule VII to the 2013 Act listed below, it will also simultaneously focus its activities in the areas of Water, Agriculture and Waste Management.

- i. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the “Swachh Bharat Kosh” set-up by the Central Government for 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 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 centers 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, and 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” setup by the 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. Measures for the benefit of 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 Olympic sports.
- viii. Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled 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 ('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. Contribution made to State Disaster Management Authorities to combat COVID-19 or other Pandemics of similar nature.

**New areas of focus:**

In the recent past, the company has initiated work in the area of nutrition, in sync with the government of India's call for public private partnership and action towards “Kuposhan Mukh Bharat” (mal-nutrition free India). The company believes that it should also focus on alleviating rural poverty and improving income and livelihood of rural farmers through various methods including by way of training and building their capacities on innovative agricultural practices leading to greater productivity and efficiency. As rural income can be boosted only by boosting agricultural income, by increasing productivity and profit per unit of land, the company considers that there is a dire need for innovation and private participation in consultation with government agencies and implementation partners focused at small and marginal farmers, whose upliftment would be the backbone of food security mission of India. Towards this, the company has been undertaking various CSR initiatives relating to agriculture, horticulture, and educating/ training

farmers in the use of modern technologies and innovative practices in horticulture and agriculture, to enable farmers to grow high yielding crops aimed at improving the income and livelihood of farmers, from the year 2018, under its Fruit Circular Economy (“FCE”) Initiatives.

#### CSR through wholly owned subsidiary:

In 2008, the company set up Coca-Cola India Foundation (hereinafter referred as “**CCIF**”) a ‘not for profit’ section 25 company under the Companies Act, 1956 as its wholly owned subsidiary, with the aim to promote inclusive growth and sustainable development through empowering backward districts of India with focus on water sustainability and environment. CCIF’s focus areas include watershed management protection and development, purification of riverine systems, creation of integrated water bodies, restoration of old water bodies, rural electrification through solar energy and other similar areas. CCIF has been implementing projects in various states in India. CCIF is registered as an Implementing Agency (“IA”) with the MCA in compliance with the requirements laid down in the amended CSR rules.

#### CSR through facilitating direct funding by The Coca-Cola Foundation, Atlanta:

Additionally, both the company and CCIF have been facilitating ‘direct funding’ by the global foundation set up by The Coca-Cola Company (“TCCC”), Atlanta, namely, The Coca-Cola Foundation, (hereinafter referred as “**TCCF**”) to reputed Implementing Partners in India, engaged in community development projects in various parts of the country. Projects funded by TCCF are not considered in calculating the mandated 2% spends of the company on CSR.

### **Governance**

**Board of Directors:** The Board reviews the impact of CSR activities, provides inputs and satisfies itself that the CSR spends are aligned to the CSR Policy and has been utilized for the purposes and in the manner as approved by it. In addition, at the end of financial year, the CFO shall certify to the Board that CSR spends have been utilized for the purposes and in the manner approved by the Board.

#### CSR Committee:

CSR Committee provides guidance on CSR activities and monitors compliance with CSR Policy, commitments, and applicable CSR provisions. The scope and role of CSR Committee shall be as set out in the 2013 Act and the CSR Rules and as laid down in the Charter of CSR Committee.

#### Governing Council:

The cross functional Governing Council (“**GC**”) constituted by the Board in 2009 to support its efforts on CSR and make recommendations to the CSR Committee/Board on various aspects concerning CSR, carries out a detailed financial and legal due diligence of Implementing Agencies before recommending their appointment. A technical feasibility study is also conducted of projects before the GC recommends them to the CSR Committee /Board for approval.

#### **Activities not considered as CSR:**

The following shall “**not be**” considered as CSR activities:

- Activities undertaken in pursuance of normal course of business.
- Contributions made, if any, to any political party.
- Monies, if any, spent exclusively for the benefit of employees [as defined in clause (k) of section 2 of the Code on Wages, 2019) and their families].
- Activities, if any, undertaken outside India, except for training of Indian sports personnel representing any state or union territory at the national or international level
- Activities, if any, supported on “sponsorship basis” for deriving marketing benefits for its products or services.
- Activities for fulfilment of any statutory obligations under any law in force in India.

### **CSR spends:**

#### Annual CSR spends

The company is committed to spend **2%** of its average net profits made during the immediately preceding three financial years on CSR activities every financial year. If during any financial year the company spends an amount in excess of 2% of its average net profits, the same will be considered as excess CSR spends for the financial year and will be set-off in the immediately succeeding three financial years subject to fulfilment of conditions prescribed under the 2013 Act and the CSR Rules, if the Board decides to do so.

#### Limits on CSR spends:

Administrative overheads on CSR activities will not exceed 5% of total CSR spends in any financial year. Total spends incurred on conducting mandatory Impact Assessment Studies of CSR projects will not exceed 5% of total CSR spends of the company for a financial year or Rs. 50 Lacs, whichever is less. The company shall not acquire any capital asset out of its CSR spends. In case it does, the said capital asset will be held by Implementing Agency/ Beneficiaries of the Project/ Public Authority, in the manner specified in the 2013 Act and the CSR Rules.

#### Unspent CSR amount:

Unspent CSR amount, if any, at the end of a financial year, shall be segregated into those in relation to 'ongoing' and 'other' projects and will be dealt with in the manner prescribed under the 2013 Act and the CSR Rules.

#### Excess CSR spends:

If in any financial year the company spends on CSR activities more than the obligated 2% of average net profits, the Board may decide to set-off the same in the immediately succeeding three financial years, subject to conditions prescribed under the 2013 Act and the CSR Rules.

#### 'Income' or 'Surplus' arising out of CSR activities:

'Income', or 'Surplus', if any, arising out of CSR activities, shall not form part of company's business profits and shall be ploughed back in the same CSR project or transferred to "Unspent CSR Account" and spent in pursuance of CSR Policy and the Annual Action Plan on CSR activities.

### **Annual Action Plan on CSR Activities ("APP-CSR"):**

As prescribed under CSR Rules, at the beginning of every financial year, CSR Committee shall prepare a detailed Annual Action Plan on CSR activities hereinafter referred to as "**APP CSR**"), for the financial year, for approval of Board. On approval of the Board of Directors, any deviation from AAP CSR will only be made with prior approval of Board, on recommendation of CSR Committee. APP CSR shall contain detailed information on the following:

- List of CSR projects that are to be undertaken for the financial year
- Manner of execution of these CSR projects.
- Modalities of utilisation of funds, year-wise (in case of multi-year projects)
- Implementation Schedules for all CSR projects
- Monitoring and reporting mechanism for all CSR projects AND
- Details of need and impact assessment studies, if any, for CSR Projects undertaken earlier

AAP CSR of the company for financial year 2022-23 is attached as an **Annexure** to this Policy. The company may take up other CSR activities during the financial year, as may be considered appropriate in accordance with approval of CSR Committee and the Board.

### **Guiding Principles for selection of Projects:**

The company will strive to select CSR projects based on following guiding principles –

- **Right focus:** Concerted and focused efforts keeping in view social, economic, environmental well-being with a holistic approach on sustainable development of people and planet leading to projects that will have long lasting and systemic impact which are non-discriminatory in nature.

- **Right scale:** Focus on scalable projects which need significant coordination with large sections of civil society.
- **Right monitoring and strong governance:** Projects with evidence-based and measurable impacts along with focus on strong governance and monitoring mechanism.

### **Implementation and monitoring of CSR Projects:**

#### **Project Implementation:**

The company will implement CSR projects either by itself directly, or through its wholly owned subsidiary- CCIF, or other Implementing Agencies which fulfil the criteria laid down in 2013 Act and the CSR Rules and which are registered with MCA. Projects are implemented in strict compliance with requirements laid down in the CSR Rules and in accordance with the socio-economic needs of India. Implementation will be in adherence to approved APP-CSR for the financial year.

#### **Project Monitoring:**

The company has a dedicated team of project managers to monitor implementation of projects which hold regular discussion with Implementation Agencies, (“IAs”) undertake regular site visits and seek periodic reports from IAs. The GC and CSR Committee also ensure periodic monitoring of projects. Payments to IAs are made as per the milestones achieved by them in accordance with the agreement executed for projects. In addition, reputed external agencies are appointed to monitor implementation of projects on the ground, who are responsible to report end-to-end activities *vis a vis* objective of projects.

Need based impact assessment studies of certain projects was being conducted by the company through external agencies. Project managers ensure that IAs submit periodic pictures of project sites and videos (both before and after completion of projects, including satellite pictures), as well as feed-back of people living in the communities/ project beneficiaries. Going forward too, the company will continue to conduct need-based impact assessment studies of various CSR projects in addition to those where it is mandatory to do so.

#### **Amendments:**

Board of Directors shall have the power to revise/modify /amend this Policy from time to time, as it may think fit, based on recommendations of the CSR Committee. In the event of any conflict between the provisions of this Policy and applicable statutes, the applicable statutes will prevail and be applicable.

**June 27, 2022**

**Gurugram**

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**Harsh Bhutani** (Chairman- CSR Committee)