

Landbase India Limited

Corporate Social Responsibility Policy*

This Corporate Social Responsibility (hereinafter referred to as 'CSR') Policy is framed in terms of the Companies Act, 2013 (hereinafter referred to as 'the Act') read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as 'the CSR Rules'), as amended from time to time.

Philosophy

Landbase India Limited ('the Company'), being a wholly owned subsidiary of ITC Hotels Limited ('ITCHL'), will discharge its responsibility by aligning itself with the CSR Policy of ITCHL and by undertaking CSR activities in areas or subjects which are independent of the normal conduct of the Company's business and are covered under the activities listed in Schedule VII read with Section 135 of the Act and the CSR Rules.

Programmes, projects and activities (hereinafter collectively referred to as 'CSR Programmes') carried out in this regard are the subject matter of this Policy.

Implementation

The Company's CSR Programmes will be implemented (i) directly, or (ii) through a registered public trust or a registered society or foundation or a company under Section 8 of the Act, established by the Company or otherwise as prescribed under the Act and the CSR Rules, or (iii) through other eligible implementing agencies.

The Company may also collaborate with ITCHL or other companies for undertaking CSR programmes in such a manner that the respective companies are in a position to report separately on the CSR activities being undertaken.

The programmes to be undertaken by ITCHL Entities or other eligible implementing agencies will be specified, and it will be ensured that such programmes are covered in the Objects laid down in the respective Trust Deeds / Memorandum and Articles of Association of ITCHL entities and the other eligible implementing agencies.

Governance

- i. Every financial year, the Manager / Managing Director and the Chief Financial Officer (Responsible KMPs) of the Company, will place for the approval of the Board of Directors of the Company (hereinafter referred to as 'the Board'), an Annual CSR Action Plan (hereinafter referred to as 'Annual CSR Plan') delineating the CSR Programmes to be carried out during the financial year, including its potential impact, the budgets thereof, their manner of execution, modalities of utilization of funds, implementation schedules, monitoring & reporting mechanism and other matters which are required under applicable law, in respect of CSR Programmes. The Board will consider and approve the Annual CSR Plan with such modification that may be deemed necessary; the Annual CSR Plan may also be modified by the Board during the financial year, on the recommendation of the Responsible KMPs.

- ii. The Board will assign the task of administering the implementation of the Annual CSR Plan within specified budgets and timeframes to such persons or bodies as it may deem fit.
- iii. The Responsible KMPs will keep the Board apprised on the status of implementation of the CSR Programmes based on the report-back received from the persons or bodies who have been entrusted with the task, as stated under (ii) above or otherwise.
- iv. The Board will review the report back stated under (iii) above and issue directions as may be necessary to ensure orderly and efficient execution of the CSR Programmes in accordance with this Policy. In case of ongoing CSR Programmes (having time schedule of three years or more), the aforesaid report back will also include progress of their implementation with reference to approved timelines and year-wise allocation.
- v. The aforesaid report-back will also include confirmation from the Chief Financial Officer that the funds disbursed for the CSR Programmes are being utilized for the stated purpose and in the specified manner.
- vi. At the end of every financial year, the Responsible KMPs will submit to the Board an Annual Report on CSR activities, which will be disclosed as part of the Report of the Board of Directors of the Company.



Classic Golf & Country Club

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Corporate Identity Number : U74899HR1952PLC052412

CSR expenditure

- i. It will be the Company's endeavor to spend in every financial year, at least two percent of its average net profits made during the three immediately preceding financial years (or such other limit as may be prescribed under the Act), on CSR Programmes in pursuance of this Policy.
- ii. The CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the Annual CSR Plan within the limits as may be prescribed under the Act and applicable Rules.
- iii. Surplus, if any, arising out of the CSR Programmes shall not form part of the business profit of the Company and shall be ploughed back into the CSR activities within six months from the end of the relevant financial year. Any income arising from CSR Programmes will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.
- iv. If CSR expenditure in a financial year exceeds the statutory limit, such excess may be set-off against CSR expenditure for the next three financial years with the approval of the Board.



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LAND BASE
LANDBASE INDIA LIMITED
(A WHOLLY OWNED SUBSIDIARY OF ITC HOTELS LIMITED)

This Policy will be uploaded on the Company's website <https://cgronline.com/> and web link thereto will be provided in the Report of the Board of Directors of the Company.

In the event of any inconsistency between this Policy and the applicable laws, the applicable laws will prevail.

This Policy will be reviewed by the Board, on the recommendation of the Responsible KMPs, as and when deemed necessary.

**This Policy was approved by the Board on 15th October, 2025 and last amended on 7th October, 2022.*



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