Policy Title: Corporate Social Responsibility and Sustainability Policy ("**CSR Policy**")
Entity: Bagmane Realty Investment Manager Private Limited (acting as Investment Manager to Bagmane Prime Office REIT)
Approval Date: September 08, 2025
Amendment Date: December 11, 2025 (Amended pursuant to constitution of CSR Committee)
Approved by Authority: Board of Directors of Bagmane Realty Investment Manager Private Limited (acting as Investment Manager to Bagmane Prime Office REIT) ("**The Company**")

Introduction:

The Company is the Investment Manager of Bagmane Prime Office REIT. The CSR Policy is applicable to the Company.

The CSR Policy has been developed in accordance with Section 135 of the Companies Act, 2013 and in accordance with the Company CSR Policy Rules, 2014 ("**CSR Rules**") made thereunder.

The CSR Policy shall apply to all corporate social responsibility ("**CSR**") activities undertaken by the Company in India as per Schedule VII to the Companies Act, 2013

The CSR activities shall not include activities undertaken by the Company in pursuance of the normal course of its business. Further, projects, programs or activities that solely benefit the employees of the Company and their families shall not be considered as CSR Activities under this CSR Policy.

Objectives:

The Company recognizes and is committed towards creating common good for all. The Company shall implement its CSR Activities to integrate economic, environmental and social objectives with its operations and growth for common good which include initiatives and endeavours for the benefit and development of the community and society.

The Company is committed towards making visible and tangible contribution to communities and environment. The Company shall identify projects/ programs/ activities both in urban/ rural areas that will improve quality of life.

The broad objectives of this CSR Policy is to:

(i) demonstrate commitment to the common good through responsible business practices and good governance; (ii) actively support the country's development agenda to ensure sustainable change; (iii) set high standards of quality in the delivery of services in the social sector by creating robust processes and replicable models; and (iv) Generate community goodwill for the Company and help reinforce a positive and socially responsible image, through our CSR Activities.

CSR Committee:

The Board of Directors of the Company ("**Board**") will be responsible for the constitution of the CSR Committee.

In compliance with the requirements of Section 135(1) of the Act, a CSR Committee has been constituted by the Board. The CSR Committee at all times shall comprise a minimum of 2 directors.

The quorum for a meeting of the CSR Committee would be two members. The meetings shall be held at the registered office of the Company or at such place as may be agreed to by the members of the CSR Committee.

Any changes to the membership of the CSR Committee, and any modification to the powers and the functions of the CSR Committee will require the approval of the Board.

The CSR Committee shall be responsible for monitoring the CSR Policy from time to time. The CSR Committee shall approve and recommend to the Board, the projects or programmes to be undertaken, the modalities of execution and implementation schedule from time to time and the amount of CSR Expenditure in a year to be spent in accordance with the Companies Act, 2013 and the CSR Rules.

The CSR Committee shall institute transparent monitoring mechanism for implementation of the CSR Activities undertaken by the Company.

Terms of reference of CSR Committee:

- Formulate and recommend to the board of directors, a “Corporate Social Responsibility and Sustainability Policy” which shall indicate the activities to be undertaken by the Bagmane REIT, in accordance with applicable laws
- Recommend the amount of expenditure to be incurred on the activities referred to in the above clause
- Monitor the Corporate Social Responsibility and Sustainability policy and its implementation from time to time; and
- Any other matter as the CSR and Sustainability Committee may deem appropriate after approval of the board of directors or as may be directed by the board from time to time and/or as may be required under applicable law, as and when amended from time to time.

CSR Activities:

The Company will undertake its CSR Activities in the following areas:

1. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
3. 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;
4. Ensuring environmental sustainability, ecological balance, 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.
5. 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 art and handicrafts;
6. Measures for the benefit of armed forces veterans, war widows and their dependents;

7. Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports;
8. Contribution to the prime minister's national relief fund or any other fund set up by the Central Government for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
10. Rural development projects including community/social/infrastructure creation intended for the general well being of society at large;
11. Slum area development including social infrastructure projects in urban areas aimed at improving the well being and safety of the general public in such urban areas; and
12. Disaster management, including relief, rehabilitation and reconstruction activities.

The CSR Committee will be entitled to include other projects/ programs/ activities or any social development initiatives as may be approved by the CSR Committee/Board which is in accordance with the Act read with Schedule VII.

The Company shall give preference to the local area and areas around it where it operates, for undertaking/implementing/executing/collaborating for CSR Activities.

CSR Implementation:

The Board along with the CSR Committee shall be responsible for implementation of this CSR Policy. We may undertake the CSR Activities either ourselves or through other qualifying entities as specified under law from time to time. The projects, programs or activities identified by the CSR Committee and approved by the Board shall be implemented in a project mode which will entail charting the stages of execution through planned processes, measurable targets, mobilization and allocation of budgets and prescribed timelines. It also involves assigning of responsibility and accountability. Suitable documents/ agreements shall be entered into with entities for the purposes of implementation of the CSR Activity, in case the CSR Activity is proposed to be implemented through the third party agencies. The conditions of grant of amounts for all CSR Activities and the break-up of the allocations shall be set out and evaluated from time to time.

If the Company fails to spend the amount, reasons for not spending to be specified in the annual report of the Company.

The Board shall satisfy itself that the funds disbursed for CSR activities have been utilized for the purposes and in the manner as approved by it. The Chief Financial Officer or the person responsible for financial management will be required to certify it to the effect.

An update on CSR implementation shall be submitted to the Board by the CSR Committee, periodically.

Monitoring Mechanism:

The CSR Committee will ensure a transparent monitoring mechanism for ensuring effective implementation of the CSR Activities proposed to be undertaken by the Company. The CSR Committee will ensure that the CSR Activities are undertaken in compliance with this CSR Policy and in a project or program mode with clearly defined project deliverables, implementation schedules, processes and budgets as mentioned above. The CSR Committee will monitor the programs and projects to ensure that they are being carried out in compliance with this CSR Policy and the Act and in accordance with the approved budget.

The CSR Committee shall recommend the amount of CSR Expenditure in a year to be spent in accordance with the Companies Act, 2013 and the CSR Rules. For this purpose the Board shall ensure that a designated officer of the Company will provide the relevant finance data and such other necessary details to the CSR Committee.

The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of the CSR Policy and such plan shall include relevant details as specified under law from time to time.

In case of an ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and will be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

Other Key Responsibilities:

The Company may build CSR capacities by providing suitable training to their own personnel as well as those of implementing agencies through institutions with established track record of at least three financial years. However, such expenditure including expenditure on administration overheads shall not exceed 5% of the total CSR expenditure of the Company in one financial year.

The CSR Committee shall undertake impact assessment, through an independent agency if the thresholds provided under the applicable law are met and the impact assessment reports so prepared shall be placed before the Board and shall be annexed to the annual report on CSR.

Tax treatment of CSR spent will be in accordance with Income Tax Act, 1961 as notified by Central Board of Direct Taxes.

Record Keeping:

The CSR Committee shall maintain proper minutes of all its meetings.

The CSR Committee shall prepare an annual report on CSR with such information and particulars as may be required under law and such report shall be included in the Board's report annexed to the financial statements.

The annual report of the Company shall include an annual report on CSR containing such details as may be prescribed from time to time under law.

The Board will be responsible to ensure that the statutory requirements as may be prescribed from time to time under law are complied with.

Disclosures:

The CSR Committee shall prepare an annual report on CSR, in the format prescribed under the Act and such report shall be included in the Board's report annexed to the financial statements. The report shall be signed by the Chairman of the CSR Committee, CEO/Director of the Company and such other person as may be prescribed. The Company shall host the contents of the CSR Policy on its website in such manner as may be prescribed.

A responsibility statement shall be issued by the CSR Committee that the implementation and monitoring of CSR Policy is in compliance with CSR objectives and policy of the Company, at the end of each financial year.

Amendments:

The CSR Committee is empowered to recommend amendments or modifications to the CSR Policy and such changes shall be placed before the Board for approval. Where the CSR Policy is in variance with the requirements of the Act, the provision of the Act shall prevail.

General:

In case of any doubt with regard to any provision of the CSR Policy and also in respect of matters not covered herein, a reference to be made to the CSR Committee or to the Chairman of the CSR Committee. In all such matters, the interpretation and decision of the Chairman of the CSR Committee shall be final.