



American Express Banking Corp. Policy

Policy Reference & Name : AEBC 42 India Corporate Social Responsibility (“CSR”) Policy

Effective Date : 30th October 2025



1.0 OVERVIEW AND PURPOSE

American Express Banking Corp. India (“AEBC” or the “Bank”) believes that serving our communities is not only integral to running a business successfully; it is part of our individual responsibilities as corporate citizens. The mission of our program is to bring to life the AEBC value of good corporate citizenship by supporting diverse communities in ways that enhance the bank's reputation with employees, customers, business partners and other stakeholders.

The purpose of this India Corporate Social Responsibility Policy (hereinafter referred to as “India CSR Policy” or “the Policy”) is to ensure that the India CSR obligations of the Bank are executed in accordance with the provisions of the Companies Act, 2013, contributions are consistent with the objectives of American Express Company community investment and disbursed under the approval of the AEBC India Corporate Social Responsibility Committee .

2.0 POLICY SCOPE

This Policy is applicable to AEBC India for compliance of its CSR obligation in accordance with the provisions of the Companies Act 2013

3.0 KEY DEFINITIONS

In this Policy, unless the context otherwise requires

- ‘Act’ means Companies Act, 2013;
- ‘Corporate Social Responsibility’ means Corporate Social Responsibility (CSR) as defined in Section 135 of the Companies Act 2013 and implementing rules;
- ‘Ministry’ means the Ministry of Corporate Affairs;
- ‘Net Profit’ in accordance with Section 135.the term net profit is defined as the net profit before tax , as reflected in the company’s books of accounts computed as per the adjustments in accordance with section 198. Specifically, this definition excludes profits derived from branches located outside India.2% CSR spending would be computed as 2% of the average net profits made by the bank during every block of three years. For the first CSR reporting period, the Net Profit shall mean average of the annual net profit of the preceding three financial years ending on or before 31 March 2014.
- Tax treatment of CSR spend will be in accordance with the Income Tax(IT) Act as may be notified by Central Board of Direct Taxation (CBDT).
- “CSR Committee” means India Corporate Social Responsibility Committee of AEBC, formed in compliance with section 135 of the Act and implementing rules.
- Words and expressions used in this Policy and not defined herein but defined in the Act shall have the meaning respectively assigned to them in the Act.



- Charitable Organization, Charity or charities: An organization which qualifies and fulfills the requirements under the Companies Act, 2013 including applicable Rules made thereunder for the time being in force and is eligible to receive funds for CSR activities under the Act.
- Ongoing Projects means a multi-year project having timelines not exceeding 03 years excluding the financial year in which it was commenced.

4.0 ROLES AND RESPONSIBILITIES

4.1 The AEBC India CSR Committee

The AEBC India CSR Committee has the following roles and responsibilities:

- i. CSR Committee shall formulate and recommend to the AEBC Board, an annual action plan in pursuance of the CSR policy and the applicable CSR rules and regulations
- ii. Review and approve all requests for charitable contributions and ensure that the recipient organizations are eligible for receiving funds for CSR activities as required under the provisions of the Companies Act, 2013.
- iii. Ensure compliance with the CSR rules and regulations as applicable and amended from time to time.
- iv. Ensure that contributions are aligned with the American Express's community reinvestment programs and in accordance with the provisions of Companies Act, 2013.
- v. Ensure that all payments to charities, whether charitable contributions or not, are properly accounted for.
- vi. Recommend the amount of expenditure to be incurred on CSR activities.

4.2 The AEBC Board

The AEBC Board shall be responsible to satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it.

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

4.3 Chief Financial Officer (CFO) or the person responsible for financial management

The CFO or the person responsible for the financial management shall certify that funds so disbursed have been utilized for the purposes and in the manner as approved



5.0 POLICY REQUIREMENTS

5.1 India CSR Committee, CSR Spend and CSR Reporting Requirements

India CSR Committee: AEBC India CSR Committee constituted in accordance with the Provisions of the Companies Act, 2013 including any other applicable provisions, rules or guidance for the time being in force shall have the responsibilities of oversight and compliance of the provisions relating to CSR. The constitution of the India CSR Committee members is described in AEBC India Corporate Social Responsibility (CSR) Charter.

Annual CSR Spend: The India CSR Committee shall finalize the amount required to be spent on CSR activities and projects including the manner of expenditure in that financial year. The amount so required, currently 2% of average net profit of last three years to be spent shall be calculated in accordance with the provisions of the Companies Act, 2013 or any rules made there under and for the time being in force.

India CSR Committee Meetings: The India CSR Committee shall meet as and when required but at least once in each financial year. The India CSR Committee shall, inter alia, review the ongoing CSR spends, projects, compliance with India CSR Policy, Compliances and reporting requirements under the provisions of the Companies Act, 2013.

Miscellaneous: The India CSR Committee shall act in accordance with the requirements of the Companies Act, 2013, other applicable internal policies including any incidental and ancillary matters as may be deemed necessary and required.

Annual CSR Reporting: The India CSR Committee shall prepare and provide an annual report with the India CEC and the AEBC Board in the format as per Companies Act, 2013 and the CSR Rules for the time being in force

5.2 CSR Activities and Contributions

See Appendix I

5.3 India CSR Committee Composition

See Appendix II

5.4 Surplus



Any surplus arising from any CSR projects, programs or activities shall not form part of business profits of the Bank. Such surplus shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy / 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

5.5 Transfer of Unspent CSR Amount

Until a fund is specified in Schedule VII for the purposes of subsection (5) and (6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act.”.

5.6 Set off of excess amount spend towards CSR

Where a company spends an amount more than requirement, such excess amount may be set off against the requirement to spend in the immediate succeeding three financial years subject to the conditions that –

- (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any,
- (ii) the AEBC Board of the company shall pass a resolution to that effect.

5.7 Building CSR Capacities

The Bank may build CSR capacities of its own personnel as well as those of its implementing agencies through institutions with established track records of at least three financial years in accordance with the provisions of the Companies Act, 2013 including any rules made thereunder for the time being in force. Any such expenditure shall be eligible as CSR expenditure subject to a maximum of 5% of the total CSR expenditure of the Bank in one Financial Year or such amount or percentage of total CSR expenditure as may be prescribed under the Companies Act, 2013 from time to time.

5.8 Expenses that will not qualify as CSR contributions

Following shall not be considered as CSR activity:

- Contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- Contribution or Expenditure of any amount directly or indirectly that benefits only the employees of AEBC or their families;



- Contribution or Expenditure of any amount directly or indirectly for any CSR projects, programs or activities undertaken outside India.
- Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services. Activities carried out for fulfillment of any other statutory obligations under any law in force in India

5.9 Administrative Overheads

- Only the expenses incurred by the company for ‘general management and administration’ of Corporate Social Responsibility functions classified as administrative overheads.
- The expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or program specifically excluded.
- The administrative overheads not to exceed five percent of total CSR expenditure of the company for the financial year.

5.10 Implementation of CSR Programs

In order to implement the approved CSR projects, the CSR Committee may involve specialized agencies, which may include NGOs, Trusts, Self-Help Groups, Govt./Semi-Govt./Autonomous Organizations, Professional Consultancy Organizations, Registered Voluntary Organizations, or any other appropriate agency/authorities which meets the criteria prescribed under the Companies Act, 2013 or the Rules framed thereunder or any other applicable law for the time being in force

A company may engage international organizations for designing, monitoring and evaluation of the CSR projects or programs as per its CSR policy as well as for capacity building of their own personnel for CSR. Only Central Government notified organizations shall qualify as International Organization

A company may also collaborate with other group companies for undertaking projects or programs or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programs in accordance with these rules.

5.11 Impact Assessment

A company having the obligation of spending average CSR amount of Rs 10 Crore or more in the three immediately preceding financial years shall undertake impact assessment. As may be required under the provisions of the Companies Act, 2013 read with applicable Rules, the Company shall appoint and engage eligible independent agency(ies) to review and present an impact assessment report of the CSR project(s) undertaken by the Company. Such Report(s) to be reviewed in accordance with the Companies Act 2013 and the CSR Rules for the time being in force. Any Expense incurred on obtaining Impact Assessment Report shall be treated as CSR expense subject to its eligibility and as provided under the provisions of the Companies Act, 2013 read with the Rules framed thereunder for the time being in force.



5.12 Website disclosures

Required to disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the AEBC Board on its website.

6.0 POLICY EXCEPTION/CONFLICT/INTERPRETATION RESOLUTION

It is the responsibility of American Express employee subject to this policy to escalate to the Policy Sponsor or Policy Overseer any conflicts, interpretation issues, or policy gaps/inadequacies associated with AEBC Policies. The Policy Custodian may provide policy interpretation and guidance as needed; but when potential issues have contradictory interpretations for existing practices the Custodian should facilitate a discussion with the Policy Sponsor and Overseer to develop appropriate resolution plans.

All requests for exceptions to policies, or the related procedures, must be formally approved by the Policy Approvers, as outlined in Section 7 of this Policy. Exception requests must include an Action Plan and Rationale and must carry either an Expiration or Review Date. Any identified exception to a policy that has not yet been approved must be escalated to the respective Policy Overseer immediately. Approved policy exceptions do not constitute policy non-compliance. It is the responsibility of the Policy Sponsors to define their Policy's Exception / Conflict / Interpretation Resolution Requirements. The Policy Custodian will maintain documentation of all exceptions and will regularly review these exceptions to assess whether a policy change is required and to ensure ongoing policy compliance.

The AEBC CRO retains the authority to resolve conflicts only surrounding policy framework related matters, with appropriate senior leadership, should they arise.

7.0 POLICY APPROVAL REQUIREMENTS

This policy must be reviewed and approved by the AEBC Board of Directors at least annually. Additional reviews could be triggered by major changes in corporate strategy, the regulatory environment or financial market conditions.

Prior to each review by the AEBC Board, this policy, and any proposed changes in this policy, should be reviewed by:

Approval Level

Level 1	AEBC Board of Directors
Level 2	India CEC
Level 3	N/A
Level 4	Policy Sponsor – AEBC Controller

8.0 ENFORCEMENT OF ISSUED POLICIES AND PROCEDURES

All employees and agents of AEBC are responsible for complying with applicable official policy, procedure or a standard/program. AEBC Senior Management and Officers are ultimately responsible for ensuring adherence to policy within AEBC. Internal auditors and control groups, as applicable, will review compliance with policy and



procedure. **Noncompliance with issued policies or procedures is a breach of the terms of employment and may lead to disciplinary actions which may include termination of employment, or third-party agreement.**

AEBC Policies do not take precedence over local law yet still must be aligned to management policy requirements.

9.0 POLICY IMPLEMENTATION

Management will oversee that procedures necessary to implement this policy are established for AEBC India.

The policy is effective as of the date on the cover page.

10.0 RELATED POLICIES, GUIDELINES AND SUPPORTING DOCUMENTS

The following is a list of related policies and related guidelines: □

Section 135(1), Companies Act 2013



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□ Companies (Corporate Social Responsibility Policy) Rules, 2014

11.0 POLICY REVISION HISTORY

Previous Approval Dates:

May 2025
May 2024
Mar 2023
May 2022
September 2021
February 2021
March 2020
March 2019
February 2018
March 2017
February 2015

Current Approval Date: October 2025

12.0 POLICY APPENDICES

Appendix I: CSR Activities and Contributions

At American Express Banking Corp, the powerful backing we provide our customers is at the heart of our brand promise. Our service ethos has been central to who we are since our founding, and it extends beyond our customers to include the way we treat our colleagues, the communities in which we live and work, and the planet we all call home. In conducting our business around the world, we work hard to be environmentally conscious, socially responsible, a compassionate employer, and, most of all, a company that people can trust to do what's right

The Bank's CSR focus areas are detailed as under:

1. Hunger, Poverty, Malnutrition & Health



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- Eradicating hunger, poverty, and malnutrition.
- Promoting healthcare, including **preventive healthcare**.
- Promoting **sanitation**, including contribution to the **Swachh Bharat Kosh**.
- Providing **safe drinking water**.

2. Education

- Promoting education, including **special education**.
- Enhancing **employment-enhancing vocation skills**, especially for:
 - Children
 - Women
 - Elderly
 - Differently-abled
- Initiatives for **livelihood enhancement projects**.

3. Gender Equality and Women Empowerment

- Promoting **gender equality**.
- Setting up homes and hostels for **women and orphans**.
- Establishing **old age homes, day-care centres, and facilities for senior citizens**.
- Measures for reducing **inequalities faced by socially and economically backward groups**.

4. Environmental Sustainability

- Ensuring **environmental sustainability, ecological balance**.
- Protection of **flora and fauna**.
- Animal welfare, agroforestry, conservation of natural resources.
- Maintaining quality of **soil, air, and water**.
- Contributions to the **Clean Ganga Fund**.

5. Protection of National Heritage, Art, and Culture

- Protection of **national heritage, art, and culture**.
- Restoration of buildings, sites of historical importance, and works of art.
- Setting up public libraries.
- Promotion and development of **traditional arts and handicrafts**.

6. Support for Armed Forces Veterans

- Measures for the benefit of **armed forces veterans**, war widows, and their dependents.
- Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans and dependents.

7. Training and Promotion of Sports



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- Training to promote **rural sports**, nationally recognized sports, Paralympic sports, and Olympic sports.

8. Contribution to Government Funds

- Prime Minister's National Relief Fund (PMNRF).
- PM CARES Fund.
- Funds set up by the **Central Government** for:
 - Socio-economic development and relief
 - Welfare of Scheduled Castes, Scheduled Tribes, OBCs, minorities, and women.
- Funds for **CAPF & CPMF veterans, dependents, and widows.**

9. Rural Development Projects

- **Rural development projects.**
- **Slum area development**

10. Disaster Management

- Disaster relief, rehabilitation, and reconstruction activities.

Appendix II: India CSR Committee Composition

The AEBC India CSR Committee comprises the following voting members:

- AEBC India Market Controller (Chair)
- AEBC Chief Financial Officer (CFO)/Representative
- AEBC India Treasurer/Representative
- AEBC India Branch Manager
- AEBC India Head Global Commercial Services
- AEBC India CRO Team - Director