

CSR-1 Registration — How NGOs Access Corporate CSR Funds Legally

CSR-1 is the registration number issued by the Ministry of Corporate Affairs (MCA) to eligible NGOs, trusts, and Section 8 Companies that want to receive CSR (Corporate Social Responsibility) funds directly from Indian companies.

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compliance-primer

Published: June 2026 · Last reviewed: June 2026

Under Section 135 of the Companies Act, 2013, qualifying Indian companies must spend 2% of their average net profit on CSR activities. This creates a legally mandated flow of corporate spending toward social causes — estimated at over Rs. 25,000 crore annually across India, with Odisha receiving a growing share due to its large mining and industrial sector.

Without CSR-1: A company cannot legally count a donation to your NGO as CSR expenditure under Schedule VII. Without this count, the CSR head of any serious company will not engage with your organisation for CSR purposes — their compliance obligation requires verified, CSR-1-registered implementing agencies.

With CSR-1: Your organisation is formally registered in the MCA database as a legitimate CSR implementing organisation. Companies can transfer funds to you and record the expenditure against their Schedule VII CSR mandate.

Important: CSR-1 registration does not guarantee any company will give you CSR funds. It is the eligibility prerequisite — you still need to pitch, build relationships, and demonstrate programmatic credibility. But without CSR-1, those conversations cannot lead to a legal CSR transfer.

Who Is Eligible for CSR-1?

Eligibility has two tests — entity type and track record. Both must be satisfied simultaneously.

Test 1 — Entity Type

Under the Companies (CSR Policy) Rules, 2014, as amended, eligible entities include:

- Section 8 Companies
- Registered public trusts (registered under the Indian Trusts Act or state Public Trust Acts)
- Registered societies (registered under the Societies Registration Act, 1860)

Additionally, the entity must have RNPO registration under the Income Tax Act — specifically, both:

- RNPO registration (Section 332, IT Act 2025 — old 12A/12AB equivalent), AND
- Section 354 approval (old 80G equivalent)

Test 2 — Track Record

The entity must have an established **track record of at least 3 years** of undertaking social, developmental, or charitable activities.

The July 2025 change: From 14 July 2025, the MCA revised Form CSR-1 to require:

- Mandatory disclosure of RNPO (12A and 80G) registration details at the time of filing
- All details of CSR projects undertaken in previous years
- NGO DARPAN ID (mandatory field)
- Fully web-based submission (no downloadable PDF form — must be filed online on MCA21 portal)

This means a new trust registered in 2026 **cannot apply for CSR-1** until approximately 2029 — when it will have both the 3-year track record and the RNPO

registration to satisfy both tests.

How CSR Funding Actually Works — The Three Pathways

Before understanding CSR-1, understand how a company can deploy its CSR mandate:

Pathway A — Direct Implementation: The company runs its own CSR programmes through an internal team or through a Company Foundation. No external NGO involved. No CSR-1 required from the company's side.

Pathway B — Implementing Agency (CSR-1): The company funds an NGO (with CSR-1 registration) to implement programmes on its behalf. The NGO is the implementing agency. This is the most common pathway for mid-sized and large Odisha companies (NALCO Foundation, Vedanta's social arm, JSPL Foundation, NTPC's CSR, etc.).

Pathway C — PM Fund / CMRF / Central/State Government Fund: Companies transfer CSR funds to Prime Minister's Relief Fund, CM Relief Fund, or certain Central Government funds — automatically qualifies as CSR spend without any external NGO involvement.

For NGOs, Pathway B is the target. CSR-1 is the gateway to Pathway B.

How to Apply for CSR-1 — When You Are Eligible

Pre-requisites checklist before filing:

- Entity registered (Trust / Society / Section 8 Company)
- PAN obtained
- DARPAN ID (mandatory field)
- RNPO registration under Section 332, IT Act 2025 (12A equivalent) — certificate (Form 10AC) in hand
- Section 354 approval (80G equivalent) — certificate in hand

- At least 3 years of documented charitable activities
- Audited accounts for at least 3 years
- Bank account in the organisation's name

Where: MCA21 portal — mca.gov.in → MCA Services → e-Filing → Forms and Downloads → CSR-1

The process (fully online since July 2025):

1. Log in to the MCA21 portal using the organisation's credentials
2. Access Form CSR-1 under the CSR section
3. Fill all mandatory fields: entity type, PAN, registration details, DARPAN ID, RNPO registration details (Section 332 certificate number), Section 354 details, bank account
4. Upload: Registration certificate, RNPO certificate, 80G/Section 354 certificate, latest audited accounts, DARPAN certificate
5. Digitally sign (DSC of the Managing Trustee / Director) — a Digital Signature Certificate is required for MCA filings
6. Submit

CSR-1 number format: CSR[year][sequential number] — e.g., CSR00028xxx. This number is cited by the company in its CSR expenditure report.

Fee: No government fee for CSR-1 registration itself. However, obtaining and using a DSC has associated costs.

Processing time: CSR-1 is typically auto-processed — the MCA system validates the PAN, DARPAN ID, and RNPO registration electronically. If all validations pass, the CSR-1 number is issued immediately or within 2-3 working days.

After CSR-1 — How the Funding Relationship Works

Once you have CSR-1, here is how the formal CSR funding relationship operates with a company:

- 1. Agreement:** The company and your NGO sign a CSR Implementation Agreement specifying: project objectives, budget, timeline, deliverables, monitoring and reporting requirements, and fund release schedule.
 - 2. Fund release:** The company transfers funds to your NGO's bank account. The transfer must reference the CSR project and your CSR-1 number.
 - 3. Utilisation and reporting:** Your NGO implements the project and provides utilisation certificates (UCs) to the company at agreed milestones. The company's CSR team or a monitoring agency may conduct field visits.
 - 4. Annual disclosure:** The company is required under Section 135 to disclose all CSR spending in its Annual Report — including the names of implementing agencies (your organisation) and their CSR-1 numbers. Your NGO's CSR work becomes public record.
 - 5. Impact documentation:** Companies increasingly require documented impact evidence — beneficiary data, photographs, third-party assessments. Build this documentation from Day 1 of any CSR programme.
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The NGO's Responsibility Once Receiving CSR Funds

Receiving CSR funds creates specific obligations beyond regular donation management:

Utilisation Certificates (UCs): Issue UCs to the company at every fund release milestone. UCs are signed by your Managing Trustee/CEO and your CA, certifying that the funds have been used for the stated purposes.

Separate accounting for CSR funds: While not mandated by a single law, best practice (and most CSR agreements) require separate accounting for each CSR project — so the company can trace their specific expenditure.

No cross-utilisation: Funds received for Project A cannot be diverted to Project B without written approval from the company. This is an FCRA-like discipline applied to domestic CSR funds by the companies themselves.

Annual impact report: Provide the company with an annual impact report within 90 days of the financial year end — beneficiaries reached, outputs delivered, outcomes evidenced.

Compliance record: If the company is audited by the SEBI, MCA, or CAG for CSR compliance, they will produce your UCs and agreements as evidence. Your documentation must be clean.

What Happens After 3 Years — When JaBaSu Becomes CSR-1 Eligible

JaBaSu Trust, registered in 2026, will be eligible to apply for CSR-1 in approximately 2029 — after three years of documented charitable activities and with active RNPO (Section 332 + Section 354) registration.

In the meantime, JaBaSu can:

1. Receive 80G-eligible donations from companies (these do not count as CSR expenditure for the company, but they are tax-deductible under Section 80G for the company as an income tax deduction — different from Schedule VII CSR)
2. Partner with CSR-1-registered NGOs as a sub-implementing agency — receiving funds from the registered NGO for specific activities, with that NGO's CSR-1 covering the compliance requirement

3. Build documented programme work that creates the 3-year track record required for CSR-1

For Odisha NGOs that already have 3+ years of operations and RNPO registration: apply for CSR-1 now. It is free, takes 2-3 days, and opens the largest discretionary funding pool available for domestic Indian NGOs.

Last verified: June 2026. CSR-1 form revised July 14, 2025 — now fully web-based on MCA21 portal. Eligibility: 3 years track record + RNPO (Section 332) + Section 354 (80G equivalent) + DARPAN ID. No government fee. Digital Signature Certificate required for MCA filing. Portal: mca.gov.in.

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