

ACKO TECHNOLOGY & SERVICES PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY (“CSR”) POLICY

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1. PREFACE

Corporate Social Responsibility (CSR) is the way and means through which corporates can repay the society, by contributing the resources in its various forms as required for the efficient operation of the business. An organization must maintain highest standards of corporate behavior towards its employees, consumers and societies in which it operates.

Ministry of Corporate Affairs pursuant to Section 135 of the Companies Act, 2013, has mandated every company having net worth of rupees five hundred crore or more, or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during the immediately preceding financial year shall constitute a Corporate Social Responsibility Committee and formulate a Corporate Social Responsibility Policy ('Policy'). Hence the Company has formulated this Policy, as the networth of the company has crossed rupees five hundred crores.

2. OBJECTIVE

The objective of this policy is to identify and implement initiatives in both letter and spirit that can benefit the society at large.

3. GOVERNANCE AND APPLICABILITY

The CSR Policy has been formulated in consonance with section 135 of the Companies Act 2013 ("Act") read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (CSR Rules) notified by the Ministry of Corporate Affairs, Government of India and as amended from time to time.

This Policy shall be applicable in the event of eligibility of Company to undertake CSR activities and/or to all CSR initiatives and activities undertaken by the Company, for the benefit of different segments of society.

4. CSR COMMITTEE

The CSR Committee (Committee) shall consist of two or more Directors, as may be deemed fit by the Board of Directors of the Company (Board). The Committee shall meet, whenever required, to identify, discuss and review CSR activities and policy. However, the Committee shall meet at least once in a financial year. The Committee shall have the authority to invite such employee(s), senior official(s) and or external experts, as it may deem fit, to attend the CSR Committee Meeting(s).

5. CSR BUDGET

The total budget (if applicable) for the CSR projects shall be decided by the CSR Committee in accordance with applicable provisions of the Act and the CSR Rules. The CSR Committee shall propose to distribute the budget among the areas to emphasize or such of them as the CSR Committee may deem fit in each financial year, in such proportion and in a manner that meets the objectives of the CSR Policy and recommend them for the approval of Board

6. IDENTIFICATION & IMPLEMENTATION

The CSR committee shall identify projects and oversee, supervise and provide guidance for their implementation. The Committee shall give preference to local areas and areas around it where it operates, while considering new CSR activities. The Committee shall explore various activities and filter and shortlist projects for CSR activities and recommend them for the approval of the Board.

7. MONITORING & REPORTING

The CSR Committee shall monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports etc. Mechanisms to track data and monitor projects will be established to ensure the transparency and efficiency of the implementation process. The projects will be evaluated

against the milestones defined in the implementation plan of the project. The Committee shall appraise the Board the details and progress of the implementation from time to time.

The CSR Committee shall annually publish report on the CSR projects as a part of the Board's report. The report shall disclose information in the format as prescribed by the Section 135 of the Companies Act 2013.

The Chief Financial Officer or the person responsible for financial management shall certify that the funds so disbursed for CSR projects has been utilized for the purpose and in the manner as approved by the Board of Directors.

8. CSR ACTIVITIES/PROGRAMMES/PROJECTS

The Company will endeavour to contribute and spend at least 2% of the average net profits of the Company made during the three immediately preceding financial years or such higher amount as may be recommended by the CSR Committee from time to time in pursuance of this Policy.

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged section of the society by one or more of the focus areas as outlined below.

The CSR Committee shall consider and approve CSR activities / programmes / projects to be undertaken during the year, including but not limited, from the below mentioned areas.

- a. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the central government for the promotion of sanitation and making available safe drinking water;

- b. Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- c. Promoting gender equality, empowering women, setting up homes and hotels 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;
- d. 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 set-up by the Central Government for rejuvenation of river Ganga;
- e. 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;
- f. 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 their dependents including widows;
- g. Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
- h. Contribution to Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund), or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Schedule Castes, the Scheduled Tribes, other backward classes, minorities and women;
- i. 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
- j. 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).]

- k. rural development projects]
- l. slum area development.

Explanation.- For the purposes of this item, the term '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.]

- m. disaster management, including relief, rehabilitation and reconstruction activities.
- n. Any other activity as specified under the Act, as amended from time to time.

9. CSR ANNUAL ACTION PLAN

The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR Policy, which shall include the following:

- The list of CSR projects or programmes that are approved to be undertaken in the areas or subjects specified in Schedule VII of the Act;
- The manner of execution of such projects or programmes;
- The modalities of utilization of funds and implementation schedules for the projects or programmes;
- Monitoring and reporting mechanism for the projects or programmes;
- details of need and impact assessment, if any, for the projects undertaken by the company.'

10. IMPACT ASSESSMENT:

Impact assessment, as and when mandated, will be undertaken by an independent agency and such impact assessment report shall be placed before the Board and annexed to the annual report of CSR.

11. DISPLAY ON WEBSITE

The composition of CSR Committee, CSR Policy and Projects approved by the Board shall be displayed on the company's website.

12. AMENDMENT

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this Policy, as and when required or deemed fit. The provisions of this CSR Policy would be subject to revision/amendment in accordance with the provisions of the Act, as may be issued from relevant statutory authorities, from time to time. In the event of any inconsistency between this Policy and the applicable laws, the applicable laws will prevail.
