
CORPORATE SOCIAL RESPONSIBILITY

CSR Policy under the Companies Act, 2013 (18 of 2013) and Companies (Corporate Social Responsibility Policy) Rules, 2014

*** This policy has been updated as on 3rd August, 2022*

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1. INTRODUCTION

Extentia Information Technology Private Limited (hereinafter referred to as “Extentia” or “Company”) has been involved in Community Development activities through its platform Sakaar, to make a difference within the community.

Since the launch of Sakaar in 2001, whether it’s promoting various career development programs, running healthcare boot camps, or contributing to donation drives, we ensure that our corporate social responsibility programs add value to the community one step at a time.

The initiatives taken by Extentia are in consonance with projects and programs relating to activities specified under Schedule VII to the Companies Act, 2013 (“Act”) and Companies (Corporate Social Responsibility Policy) Rules, 2014 (“Rules”).

2. OBJECTIVE OF THE POLICY

The key purpose of this Policy is to:

- Outline the development areas in which the Company shall get involved in.
- Define governance structure for CSR management within the Company.
- Serve as a guiding document aiding in identification, execution and monitoring the CSR projects.
- Describe the treatment of surpluses from CSR activities.
- Define the approach and direction given by the Board of Directors the Company.
- Provide guiding principles for selection, implementation and monitoring of activities
- Formulate an Annual Action Plan every year as per applicable rules.

3. SCOPE OF THE POLICY:

This policy applies to all CSR Projects that will be undertaken by the Company and shall fulfill all the requirements of Section 135 of the Companies Act, 2013 and Rules made thereunder. Company shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act, 2013 as annexed herewith. This policy will be periodically reviewed and updated in line with the relevant codes of legislation and best practices can be adopted by the Company.

4. THE GOVERNANCE MODEL

4.1. Dissolution of the CSR Committee:

By virtue of an amendment to Section 135, effective from 22nd January, 2021, the company is currently not required to work through CSR committee, since its mandatory CSR spending does not exceed Rs.50.00 Lakhs. Also, the average CSR obligation of the company for immediately preceding three (3) financial years does not exceed Rs.10.00 crores. Therefore the impact assessment analysis is not mandatory for the company.

Hence the CSR Committee has been officially dissolved and henceforth onwards all CSR activities shall be monitored by the Board of Directors.

4.2. Role of Board of Directors:

The Board of Directors are responsible for administering CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013 and rules made thereunder.

The role of the Board of Directors will be:

- a) To approve the amount of expenditure to be incurred on the CSR activities;
- b) To formulate the CSR Budget based on the CSR activities planned for the year;
- c) To create an effective due diligence and monitoring mechanism for implementation of the approved CSR activities;
- d) To approve the projects and locations for CSR activities.

4.3 CSR Team:

Dedicated CSR team shall be constituted from among the employees at the Company, for implementing the CSR Policy and shall work under the guidance of the Board of Directors and will be mainly responsible for:

- Execution of the CSR Policy.
- Identify projects and key initiatives pursuant to CSR Policy.
- Facilitating allocation of funds to the projects as identified for CSR activities.
- Monitoring CSR Projects to establish effectiveness of CSR efforts and appraise the same to the Board of Directors.
- Compilation of information & preparation of Annual Reports on CSR activities and presenting the same to the Board of Directors.
- Any other activity necessary to ensure achievement of CSR objectives.

5. PROGRAMS UNDER THE POLICY:

The Company will broadly focus on the four areas under its CSR activities, as under:

Education:

- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.

Environment Sustainability:

- 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;
- 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

Medical and other Welfare:

- Providing medical relief and rehabilitation to communities who either don't have access to quality health care or cannot afford it;
- Eradicating hunger, poverty and malnutrition, promoting health care, preventive health care and sanitation and making available safe drinking water;
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- Measures for the benefit of armed forces veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- 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 scheduled castes, the scheduled tribes, other backward classes, minorities and women;
- Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- Rural development projects;
- 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.]

Emergencies and Natural Calamities:

- Company shall provide relief, support, rehabilitation, reconstruction activities etc. for disaster management in case of natural calamities or emergencies etc.

In addition to the Areas to Emphasize specified above, the Company may select any area/ sector/ activity or head of activities, as may be specified in Schedule VII to the Companies Act, 2013 including any amendments or modifications as may be introduced from time to time.

6. IMPLEMENTATION AND MONITORING OF THE CSR PROGRAMS

6.1 CSR Contributions:

The Company will endeavor 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 amount as may be approved by the Board of Directors of the Company from time to time in pursuance of this Policy.

6.2 Progress, Monitoring and Reporting:

- a) The CSR Team will plan, implement, monitor and manage all CSR projects & activities for the Company and will work closely with the Board of the Directors of the Company.
- b) The Board of Directors will review the project proposal and monitor the implementation of the projects on regular basis and establish evaluation framework for supported causes; lay down organizational supervision and oversight requirements before the release of funds.
- c) The Board will disclose information on the CSR Projects undertaken in the format as prescribed by Section 135 of the Companies Act 2013 and rules made thereunder which will form part of the directors' report.

The CSR Policy on being approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

7. BUDGET AND EXPENDITURES:

7.1 General:

Extentia shall allocate a budget towards each of the CSR activities falling within the purview of the objectives of this policy. The CSR expenditure shall include all actual expenditures including contribution to corpus or on projects or programs relating to CSR

activities approved by the Board of Directors but shall not include any expenditure that does not fall within the purview of Schedule VII of the Act.

If the Company spends an amount in excess of the requirements provided under the Act, then the Company may set off such excess amount against the requirement to spend under sub-section 5 of Section 135 for such number of succeeding financial years and in such manner, as may be prescribed under the Act and rules made thereunder.

7.2 Treatment of Surplus:

Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy or transfer such surplus amount to a Fund specified in Schedule VII, within such period and with such terms and conditions as may be prescribed under Section 135 of the Act read with relevant rules applicable.

8.ANNEXURE

Schedule VII of the Companies Act, 2013

- 1) Eradicating hunger, poverty and malnutrition, promoting preventive health care and 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 centres 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;
- 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 arts 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 Scheduled Castes, the Scheduled 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;
- 11) Any other measures with the approval of Board of Directors on the recommendation of CSR Committee subject to the provisions of Section 135 of Companies Act, 2013 and rules made there-under.
