



Corporate Social Responsibility (CSR) Policy

VERSION 1.0



1. SHORT TITLE AND APPLICABILITY

- 1.1. This policy, which encompasses the philosophy of **Excelencia iTech Consulting Pvt Ltd. ("Company")** for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare and sustainable development of the community at large, is titled as the 'CSR Policy'.
- 1.2. This policy shall apply to all Corporate Social Responsibility ("CSR") initiatives and activities to be undertaken by the Company.
- 1.3. This CSR Policy shall operate as the Corporate Social Responsibility Policy of the Company for the purposes of Section 135 of the Companies Act, 2013, and the Rules made thereunder, as amended from time to time.

2. VISION

In alignment with the vision of the Company, the Company, through its CSR initiatives is committed to continue to enhance value creation in the society and in the community in which it operates, through its services, conduct and initiatives, so as to promote sustained growth for the society and community, in fulfilment of its role as a socially responsible corporate.

3. OBJECTIVES OF THE CSR POLICY:

- 3.1. Ensure an increased commitment at all levels in the organisation, to operate its business in an economically, socially and environmentally sustainable manner, while recognizing the interests of all its stakeholders.
- 3.2. To directly or indirectly take up activities, projects and programmes that benefit the communities in and around its work centres, which comprise the weaker section of rural and tribal India with no access to basic amenities, which would result over a period of time in enhancing the quality of life and economic well-being of the local populace.
- 3.3. To generate, through its CSR initiatives, a community goodwill for the Company and help reinforce a positive image of the Company as a socially responsible corporate entity.

4. CSR PROJECTS / PROGRAMES

- 4.1. The Company proposes to serve the society by undertaking CSR projects / programs by proactively responding to the needs of the community.

4.2. The Company shall adopt one or more of the following CSR projects / programs / activities, which are as prescribed by applicable laws, including Schedule VII of the Companies Act, 2013, as amended from time to time:

- Promoting education, including special education and employment enhancing vocational skills, especially among children, women, elderly persons and the differently abled persons and provide livelihood enhancement projects to improve & facilitate literacy levels of various sections of society.
- Providing facilities to communities and other sections of the society in the form of primary health care support through diagnosis and treatments, promoting preventive healthcare, building awareness about sanitation and providing monetary support, setting up and managing rehabilitation centres, medical camps, creating awareness through various programs;

4.3. The CSR activities shall be undertaken within the territory of the Republic of India.

5. CSR COMMITTEE

5.1. The CSR Committee of the Company shall comprise of three or more Directors, of which at least one shall be an Independent Director, if applicable to the Company, otherwise the Company shall have in its CSR Committee two or more directors.

5.2. The CSR Policy and programs shall be implemented, managed and supervised by the CSR Committee appointed by the Board of Directors of the Company (“CSR Committee”).

6. ROLES AND RESPONSIBILITIES OF THE CSR COMMITTEE

6.1. The CSR Committee shall:

- a. Formulate and recommend to the Board of Directors, the CSR Policy of the Company and indicate to it the projects, programs and activities to be undertaken by the Company;
- b. Decide the CSR projects, programs and activities to be undertaken by the Company, either directly or through other agencies permitted under Companies Act, 2013;
- c. Place before the Board for its approval the CSR activities, projects, programs proposed to be undertaken by the Company in each financial year, along with the proposed expenditure in respect of each activity, project and program for the said financial year;
- d. Oversee the progress of the CSR activities, projects and programs rolled out under the said Policy on a quarterly basis;

- e. Define and monitor the budgets for the carrying out the CSR activities, projects and programs;
 - f. Determine the amount of expenditure for each CSR activity, project and program and recommend the same to the Board;
 - g. Submit a Report to the Board of Directors on quarterly basis of all CSR Activities undertaken by the Company during the financial year;
 - h. Implement, monitor and review the CSR Policy of the Company.
- 6.2. 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, namely:-
- a. The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - b. The manner of execution of such projects or programmes
 - c. The modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - d. Monitoring and reporting mechanism for the projects or programmes; and
 - e. Details of need and impact assessment, if any, for the projects undertaken by the company

7. ROLE AND RESPONSIBILITIES OF THE BOARD

- 7.1. The Board shall consider the CSR Policy formulated by the CSR Committee and approve the same with or without modifications, if any.
- 7.2. The Board shall take into account recommendations of the CSR Committee and provide appropriate instructions / directions to the CSR Committee when required.
- 7.3. The Board shall ensure that the CSR activities included by the Company in the CSR Policy are in accordance with Schedule VII of the Companies Act, 2013, as amended from time to time.
- 7.4. The Board shall consider the budgetary allocation proposed by the CSR Committee and approve the same with or without modifications.
- 7.5. The Board shall ensure that the CSR activities undertaken by the Company are in accordance with the CSR Policy of the Company.
- 7.6. The Board shall monitor the CSR activities of the Company in order to ensure that the same are in accordance with the Company's CSR Policy and the applicable law.

- 7.7. The Board shall satisfy itself that the funds disbursed have been utilised for the purposes and in the manner as approved by it.

8. FINANCIAL OUTLAY FOR CSR ACTIVITIES

- 8.1. Every year, the Company shall with the approval of its Board of Directors make a budgetary allocation for CSR activities, projects, programs for the year. The budgetary allocation will be based on the profitability of the Company and the requirements of applicable law.
- 8.2. The Company expects to spend the budgeted amount allocated for CSR activities, projects and programs planned for each financial year, within that year. The CSR Committee and the Board of Directors will disclose the reasons for not being able to spend the entire budgeted
- 8.3. Any surplus arising out of the CSR activities, projects or programs shall not form part of the business profits of the Company.

9. PROJECT IDENTIFICATION AND SELECTION CRITERIA

- 9.1. Projects to be undertaken shall be in line with Section 135 read with Schedule VII of the Act. and the Rules made thereunder.
- 9.2. For selection of any project, the scope, vicinity of Company operations / projects, environmental impact, cost, timelines, sustainability, visibility of the Company and other relevant factors needs to be evaluated.
- 9.3. A detailed proposal has to be submitted before the CSR Committee for consideration regarding the projects and selection of partner agency/NGOs to implement the project(s).
- 9.4. The CSR Committee, after due evaluation of the projects and competency, cost, credibility etc. of implementing agency/NGOs, will take the decision regarding the recommendation to be made to the Board.

10. IMPLEMENTATION

- 10.1. For effective implementation, long-term CSR plans will be broken down into medium-term and short-term plans. Each plan recommended by the CSR Committee should specify the CSR activities planned to be undertaken for each year, the budget

required for the same, define the responsibilities of the designated authorities to be engaged in the said task, and also prescribe the measurable and the expected outcome and social/ environmental impact of the CSR activity.

- 10.2. The Company recognises that the period of implementation of its long term CSR projects can extend over several years depending upon the expected outcome/ impact thereof. While planning for such long term projects the CSR Committee should estimate the total cost of each project and recommend to the Board of Directors of the Company that the Company should commit such amount for long term expenditure till completion of the said project.
- 10.3. The Company may take up the implementation of CSR projects with its own manpower and resources, if the CSR Committee is confident of its organizational capability to execute such projects.
- 10.4. Employees of the Company shall be encouraged to support the CSR activities, projects, programs of the Company by contributing and sharing their time and skills towards the causes they feel passionate about.

11. MONITORING

- 11.1. The Company recognises that monitoring is critical for assessment of the progress as regards timelines, budgetary expenditure and achievement of targets. Monitoring may be done periodically with the help of identified key performance indicators, the periodicity being determined primarily by the nature of key performance indicators.
- 11.2. Monitoring will be done in project mode with continuous feedback mechanism, and recourse always available for mid-course correction in implementation, whenever required.
- 11.3. The performance of the Company's CSR activities would be monitored on the basis of their achievement of annual targets and the utilization of their annual budgets for the activities planned and the targets set for each year.
- 11.4. Implementation and monitoring of the CSR activities will be overseen by the CSR Committee. The monitoring and evaluation may however be assigned by the CSR Committee to an independent external agency for the sake of objectivity and transparency.
- 11.5. If the projects are being implemented by external agencies, the Company may in consultation with CSR Committee designate special executives of the Company for this purpose.

12. The CSR Policy of the Company shall be posted on the web-site of the Company and appropriate disclosures shall be made in the Annual Report of the Company in accordance with the Companies Act, 2013.
13. The interpretation and decision of the CSR Committee shall be final. All provisions of the CSR Policy would be subject to revision/amendment in accordance with applicable laws.

Revision of the policy

The Company is committed to continuously reviewing and updating its policies and procedures. Therefore, said CSR Policy would be subject to modification. Any amendment of any provision of the said Policy shall be approved in writing by the Company's Board as per the recommendations of the CSR Committee and promptly disclosed on the Company's website and in applicable regulatory filings pursuant to applicable laws and regulations, together with details about the nature of the amendment.