

Corporate Social Responsibility Policy of EzeSoftware India Private Limited (the “Company”)

In accordance with Section 135 of the Companies Act, 2013 and the rules promulgated thereunder (**collectively, the “CSR Requirements”**), the Board of Directors of the Company (**the “Board”**) has adopted this Corporate Social Responsibility Policy (**the “CSR Policy”**).

CSR Projects and Programmes

The Company shall undertake specific Corporate Social Responsibility (**“CSR”**) projects and programmes, as approved from time to time by the Board in its capacity as the CSR Committee of the Company (**the “Committee”**), within the objects set out under Schedule VII of the Companies Act, 2013.

In furtherance of specific CSR projects or programmes, the Company may collaborate with nonprofit entities independent of governmental influence (**“NGO(s)”**) and other like-minded stakeholders, including other companies, registered trusts and societies, to leverage upon the collective expertise, wisdom and experience that such relationships may bring.

Set forth in **Annexure A** to this CSR Policy are the specific projects and programmes approved by the Board in furtherance of the above CSR Requirements in line with Schedule VII of the Companies Act, 2013. **Annexure A** shall be updated from time to time as necessary to reflect additions and revisions in line with Schedule VII of the Companies Act, 2013.

Exclusion from CSR

The following activities shall not form part of the CSR activities of the Company:

- ❖ The projects or programmes undertaken in pursuance of normal course of business of the Company.
- ❖ CSR projects or programmes that benefit only the employees of the Company and their families.
- ❖ Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
- ❖ Any CSR projects or programmes undertaken outside India.

Budget

The Company shall endeavor to spend, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years towards CSR projects or programmes.

In case the Company fails to spend the above targeted amount in that particular financial year, the Committee shall submit a report in writing to the Board specifying the reasons for not spending the amount which in turn shall be reported by the Board in their Directors’ Report for that particular Financial Year. Surplus arising out of the CSR projects shall not form part of the business profits of the Company.

CSR Governance

Roles and Responsibilities

The Board:

The Board will be responsible for:

- ❖ approval of the CSR Policy of the Company.
- ❖ disclosing the content of the CSR Policy in its report and placing the CSR Policy on the Company's website in such manner as prescribed under the CSR Requirements.
- ❖ ensuring that the projects included in the CSR Policy are undertaken by the Company.
- ❖ ensuring that the Company endeavors to spend, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years in pursuance of the CSR projects.
- ❖ ensuring that the Company gives preference to the local areas around its operations for spending the amount earmarked for CSR projects.
- ❖ ensuring that it specifies the reasons in its report for not spending the allocated amount in case the Company fails to spend such amount.

CSR Committee:

Composition of the Committee: The composition of the Committee is as under:

S. No.	Name	Role in the Committee
1	Ugandar Mamidipoodi	Chairman
2	Jeffrey Dirk Shoreman	Member
3	Tseten Choden	Member

The Board shall have the power to make any change(s) in the constitution of the Committee.

Responsibility of the Committee:

- ❖ formulate and recommend the CSR Policy to the Board for approval.
- ❖ monitor the CSR Policy from time to time and recommend changes to the Board.
- ❖ recommend CSR projects, which are in line with the activities specified in Schedule VII, to be undertaken by the Company.
- ❖ recommend the amount of expenditure to be incurred on CSR projects.
- ❖ constitute a transparent monitoring mechanism for ensuring implementation of the CSR projects undertaken by the Company.

Monitoring and Reporting

- ❖ The Company will monitor progress on CSR projects and CSR spending and report to the Committee and the Board on a half yearly basis.
- ❖ The Company will report CSR performance in its annual report in the structure and format prescribed in the CSR Requirements implementing Section 135 of the Companies Act 2013.

Publication of the CSR Policy

As per the CSR Requirements, the contents of the CSR Policy shall be included in the Directors' Report and the same shall be displayed on the Company's website, if any.

Policy Review & Future Amendment

The Committee may review its CSR Policy and make suitable changes as may be required and submit the same for the approval of the Board.

Annexure A

Activities which may be included by companies in their Corporate Social Responsibility Policies
Activities relating to:

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation (including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation) and making available safe drinking water;
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- (iii) 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;
- (iv) 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);
- (v) 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 art and handicrafts;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- (viii) contribution to the prime minister's national relief fund or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- (ix) contributions or funds provided to technology incubators located within academic institutions which are approved by the central government;
- (x) rural development projects;
- (xi) slum area development (Explanation - 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); and
- (xii) disaster management, including relief, rehabilitation and reconstruction activities.