

**SUVIDHAA INFOSERVE LIMITED****CORPORATE SOCIAL RESPONSIBILITY POLICY**

**[Pursuant to section 135 of Companies Act 2013 read with Companies (Corporate Social Responsibility) Rules, 2014]**

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**1. INTRODUCTION:**

At the outset, Corporate Social Responsibility (“CSR”) activities at Suvidhaa Infoserve Limited (“Suvidhaa”) is already in existence for the benefit of the employees and their immediate family members in the areas of extending loans to the employees, advance against salary, participation in festivals and best employee awards etc.

It is recognised that integrating social, environmental and ethical responsibilities into the governance of business ensures the long term success, competitiveness and sustainability.

Companies with effective CSR have image of social responsible companies, achieve sustainable growth in their operations in the long run and their products and services are preferred by the customers.

**2. TITLE AND APPLICABILITY:**

The document describes the Corporate Social Responsibility Policy (“CSR Policy”) of Suvidhaa Infoserve Limited (hereinafter referred as “Suvidhaa” or “Company”). The CSR policy shall be guided by Suvidhaa’s corporate philosophy of respect for the individual and society at large.

The CSR policy has been formulated in accordance with provisions of Section 135 of Companies Act 2013 and the Companies (Corporate Social Responsibility) Rules, 2014 and the relevant amendments/notifications/circulars etc..

The CSR policy shall apply to all CSR programmes conducted by Suvidhaa.

**3. OBJECTIVE:**

The main objective of CSR policy is to make CSR a key business process for sustainable development of the Society and Suvidhaa will act as a good corporate citizen and aims at supplementing the role of Government in enhancing the welfare measures of the society within the framework of its policy.

#### **4. CSR COMMITTEE:**

A Corporate Social Responsibility Committee (“CSR Committee”) has been constituted by the Board of Directors to oversee the CSR agenda of the company. The committee has been formed as per the requirements of Section 135 of Companies Act and Companies (Corporate Social Responsibility) Rules 2014.

Further, According to the Companies (Amendment) Act, 2020, Notification dated 28<sup>th</sup> September, 2020, and as per Section 135(9) of Companies Act, 2013, Where the amount to be spent by a Company under sub-section (5) does not exceed fifty lakh rupees, the requirement under sub-section (1) for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee provided under this section shall, in such cases, be discharged by the Board of Directors of such company.

Board of Directors shall be empowered to take decision for making or effecting changes in the constitution of the CSR Committee from time to time.

##### **4.1. Responsibilities of CSR Committee**

- i.** To formulate & recommend to the Board of Directors, a CSR policy indicating the activities to be undertaken as specified in schedule VII of the Companies Act 2013 and modify / amend the same as required from time to time;
- ii.** To review and approve annual budgets with respect to CSR programmes;
- iii.** To develop and institutionalize a CSR reporting mechanism in light with provisions of Section 135 of Companies Act 2013 and Rule 8 of Companies (CSR) Rules, 2014;
- iv.** To monitor the CSR policy, projects and programmes from time to time;

##### **4.2. Meeting of CSR Committee**

The CSR committee shall meet at least once in six months. The meeting shall be held either at registered office of company or any other place as may be decided by members. Physical presence of a minimum two members of the committee shall constitute the quorum.

#### **5. AREAS OF CSR ACTIVITIES:**

The Company is hereby devoted to direct its CSR resources, to reasonable extent for improving the quality of life of the people by focusing on social causes, including but not limited to the following areas:

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventing 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 specially among children, women, elderly and 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 home, 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 arts and handicrafts;
- vi. Measure for the benefit of armed forces veterans, war widows and their dependents;
- vii. Training to promote rural sports, nationally recognised 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 Government for socio-economic development and relief and welfare of the scheduled caste and the scheduled tribes and other backward classes, minorities and women;
- ix. Contributions or funds provided to the research & technology incubators located within academic institutions in the field of science, technology, engineering and medicine which are approved by the Central Government or state government;
- x. Rural Development Projects;
- xi. Slum area development;
- xii. Disaster management, including relief, rehabilitation and construction activities;
- xiii. Activities related to promotion of road safety as suggested vide General Circular No. 21/2014 dated 18/06/2014 issued by Ministry of Corporate Affairs.
- xiv. 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.

## **6. IMPLEMENTATION OF MECHANISM:**

- i. The company may conduct CSR programmes by itself and/or through registered trusts, societies and/or section 8 companies with an established track record

carrying on activities in the related areas or as suggested by the Ministry of Corporate Affairs vide circulars / notification.

- ii. The company may collaborate or pool resources with other companies to undertake CSR activities and may expenditure incurred on such collaborative efforts would qualify for computing the CSR spending.

## **7. BUDGETS:**

- i. A specific budget is allocated for CSR activities and spending on CSR activities shall not be less than 2% of the average net profits of the company made during the three immediately preceding Financial Years, in pursuance of this policy.
- ii. In case company fails to spend such amount, the Board shall specify the reasons for not spending the amount.
- iii. Approving authority for the CSR amount to be spent would be any one director or Managing Director (“MD”) or Chief Financial Officer (“CFO”) of the company after due recommendation of CSR Committee and approval of the Board of Directors of the Company.
- iv. The CSR projects or programmes or activities carried out/undertaken in India only shall amount to CSR expenditure.
- v. CSR expenditure shall include all expenditure including contribution to corpus, for projects or programmes relating to CSR activities approved by the Board on the recommendation of the CSR committee, but does not include any expenditure on any item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Companies Act 2013.
- vi. Tax treatment of CSR spent will be in accordance with the Income Tax Act as may be notified by CBDT.

## **8. IN CASE OF FAILURE TO SPEND CSR AMOUNT:**

In case any amount remain unspent pursuant to any ongoing project, fulfilling such conditions as may be prescribed, undertaken by a company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the company within a period of thirty days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

#### **9. DISQUALIFYING ACTIVITIES FOR CSR:**

The Company shall not spend the amount earmarked for the CSR towards:

- i. Any contribution to a political party, directly or indirectly.
- ii. In any CSR projects for the welfare of its own employees and their families.
- iii. Any CSR expenditure incurred outside India.

#### **10. CSR REPORTING:**

The Company shall annex with its Board Report an annual report on CSR in format as prescribed under CSR Rules.

The CSR Committee to prepare report that are required to be placed before the Board. The format of the Report shall be the format prescribed under the CSR Rules.

#### **11. AMENDMENT TO THE CSR POLICY:**

- i. CSR committee will review the policy from time to time based on the changing needs and aspirations of the target beneficiaries and make suitable modifications as may be necessary.
- ii. CSR policy may be updated to align it with changing requirement or changes in the legal and regulatory framework. Any revision in the policy shall be approved by the Board of Directors.

#### **12. WEBSITE:**

This Policy shall be disclosed on the website of the Company.