

Infocepts Technologies Pvt. Ltd.

CSR Policy

Version 2.1

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1. Introduction

Infocepts Technology Private Limited (ITPL) is a premier data analytics & AI consulting firm, empowering data-driven decision-making for some of the world's largest organizations. Leveraging over two decades of experience and a global team of over 2000 Data & AI Experts, we specialize in tackling complex enterprise challenges such as enhancing customer experiences, optimizing supply chains, accelerating innovation, improving customer retention, and mitigating risks with our AI-driven data analytics solutions.

Infocepts Technology Private Limited has been a socially responsible company since its inception and has been contributing towards CSR activities to benefit socioeconomically disadvantaged communities in India.

Infocepts Foundation is a wholly owned subsidiary of Infocepts Technology Private Limited and was incorporated as a Section 8 company in November 2021 under the Companies Act, 2013 (Rule 18 of 2013). Infocepts Foundation has filed Form CSR-1 with the Ministry of Corporate Affairs and registered itself for undertaking CSR Activities. It has been established as a distinct entity to ensure the effective and professional implementation of the Corporate Social Responsibility activities of Infocepts Technology Private Limited.

2. Abstract

The document outlines the Vision and Policy of Infocepts Technology Private Limited toward Corporate Social Responsibility, per Section 135 of the Companies Act 2013 and the Rules there under. It also incorporates the provisions of the amendments made to the said Act & the Rules made thereunder by the Government of India including the Amendments made in January 2021.

3. Scope

This Policy is titled as the 'ITPL CSR Policy' and it shall apply to all social responsibility initiatives and activities taken up by the Company & its subsidiaries in India for the larger benefit of the society.

4. Vision

The CSR vision is rooted in Infocepts core principle of ***"Care for Our Communities"*** and our desire to strengthen the present & future through different initiatives focused on Education and Skill Development, Health and wellness, and Community Development. Creating positive impact and social transformation through various initiatives while contributing to the sustainable development of the communities and environment to make our planet a better place.

5. Objective of the Policy

5.1 Demonstrate commitment to the common good through responsible business practices and governance.

5.2 Support and be aligned to the State's development agenda and the Sustainable Development Goals

(SDG) adopted by the United Nations Member.

6. Scope of Activities

The scope of the CSR Activities of ITPL will include, but not limited to, the following:

- 6.1 Promoting education via Scholarships for Technical courses, Vocational Skill Development Programs, Teacher Training Programs, and support to specially abled.
- 6.2 Promoting community health including preventive healthcare camps.
- 6.3 Encourage environment including self-sustainable Tree Plantation, Development of Oxygen Parks, Installation of compost machines, and Beach Cleaning initiatives.

The above list is illustrative and not exhaustive. The CSR Committee constituted by the Board of Directors is authorized to consider CSR activities as per schedule VII, which are not listed above

It is clarified that all the activities or programs shall be undertaken in India only and that such programs and activities shall not be designed to benefit the employees of the Company and their families.

7. Funding and Allocation

- 7.1 For achieving its CSR objectives, Infocepts Technology Private Limited shall allocate such amount of its average Net Profits as may be approved by the Board of Directors, but not less than 2% of the average net profits of the previous three financial years as prescribed by Section 135 of the Companies Act 2013, as its annual CSR budget in each Financial Year

7.2 Unspent CSR Amount

For Ongoing Projects: Unspent funds will be transferred to a designated account within 30 days of the financial year-end and utilised within three years.

For Non-Ongoing Projects: Unspent funds will be transferred to a Schedule VII fund within six months of the financial year-end.

Reporting: The company will disclose unspent amounts and reasons in its Board's Report and CSR disclosures

- 7.3 Funding for outside Vide CSR -1 Status

- (i) **Legal Compliance:** Align CSR activities with Schedule VII of the Companies Act.
- (ii) **Transparent Donations:** Ensure a clear process for receiving donations and issuing receipts (*refer to CSR SOP for ready reference*)
- (iii) **Fund Allocation:** Use funds solely for CSR focus areas.
- (iv) **Impact Alignment:** Link activities to the organization's social impact goals.

8. Implementation

CSR Programs of Infocepts Technology Private Limited shall be undertaken by Infocepts Technology Private Limited directly, or by the Infocepts Foundation through its implementation agency by virtue of a joint MOU (Memorandum of Understanding) or as may be decided by the CSR Committee and the Board of Directors of the company.

9. Flagship Programs

9.1 The following table gives the details of Infocepts Foundation's various flagship programs and their mode of implementation:

Focus Area	Name of Program	Beneficiary Profile	Implementation Mode
Education	Infocepts Innovate for Impact Scholarship	For needy students who are pursuing engineering courses in computer science and related fields	Through Implementation Agency
Education	Skill and Entrepreneurship Development Institute (SEDI)	Unemployed Youth	Through Implementation Agency
Environment	Development & upkeep of Oxygen Park	Residing Communities/villagers	Through Implementation Agency / Self
Health care	Heath Awareness Camp	Residing Communities/villagers	Through Implementation Agency / Self

Under all these Programs, Infocepts Foundation implements several projects each year. The selection of projects will be based on a need assessment exercise carried out either internally by the Infocepts Foundation CSR or externally by the Project Implementation Agency selected for this purpose, depending on the size and scale of the project. The proposed projects to be implemented over a financial year will be included in the Annual Action Plan the Management of Infocepts Foundation prepared and submitted to the Board each year. This Annual Action Plan will include:

9.2 Proposed List of Projects (New or Renewal projects)

9.3 Mode of implementation– (Direct / Implementation Agency) Implementation schedules and details of Funds Utilization

9.4 Monitoring and reporting (Through Monthly & Quarterly Business Reports)

9.5 Project closure and impact assessment

10. Monitoring and Impact Assessment

10.1 Infocepts Foundation has always placed significant emphasis on high-quality monitoring of each of its projects. The Core Team is responsible for monitoring each project implemented. In addition, Infocepts Foundation invests in robust Management Information Systems to ensure a regular flow

and analysis of data and information from the projects so that relevant and timely decisions for the projects can be made.

10.2 The senior management of the team is closely involved in the monitoring of the projects through quarterly project reviews as well as regular visits to the field to get a first-hand impression.

10.3 Impact Assessment of Infocepts Foundation's projects are usually carried out by qualified third-party agencies selected through an objective and transparent process. As per the amendment to the Companies Act made in January 2021 (as & when applicable) the details of projects due for impact assessment would be detailed in the annual Action Plan and approved by the Board. The impact assessment reports are published on the Foundation's website.

10.4 The Board of Directors of Infocepts Technologies Private Limited will be the apex authority responsible for the implementation of CSR projects each year under the provisions of Section 135 of the Companies Act 2013 and the amendments thereof. A CSR Report will be published as part of the Annual Report of the company which will adhere to the format provided in Section 135. In this report, the annual CSR expenditure and the unspent amount will be certified by the CFO of the company or a suitable authority designated by the CFO.

The Board of Directors will constitute a CSR Committee, details of which will be published on the company website as well as in its Annual Reports.

11. Roles and Responsibilities

11.1 The Board of ITPL will be responsible for approving the CSR Policy as Formulated by the CSR committee

11.2 Approving the Annual Action Plan recommended by the CSR Committee, in pursuance of the CSR Policy.

11.3 In case of an ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

11.4 Ensuring that in each financial year, the Company spends at least 2% of the average net profit before taxation excluding profits arising from overseas branches made during the three immediately preceding financial years, and this is certified by the CFO or the person responsible for financial management.

11.5 Disclosing in its Annual Report the names of CSR Committee members, the content of the CSR policy, and ensuring annual reporting of its CSR activities on the Company website.

11.6 Ensuring annual reporting of CSR activities to the Ministry of Corporate Affairs, Government of India, as per the prescribed format.

12. CSR Committee

12.1 Composition of the CSR Committee: The Committee will consist of three or more directors, one of whom will be an independent director.

12.2 The CSR Committee of Infocepts Technology Private Limited will be responsible for:

- (i) Formulating the CSR policy in compliance with Section 135 of the Companies Act 2013
- (ii) Formulating and recommending to the Board, an Annual Action Plan in pursuance of the CSR policy
- (iii) Recommending to the Board the CSR expenditure to be incurred
- (iv) Making modifications to the CSR policy as and when required
- (v) Regularly monitoring the implementation of the CSR projects

References:

- (i) Indian Ministry of Corporate Affairs website (www.mca.gov.in)
- (ii) Indian Institute of Corporate Affairs (<https://iica.nic.in/>)
- (iii) NSDC (www.nsdcindia.org)
- (iv) CSR box (www.csrbox.org)