

ALATION INDIA PRIVATE LIMITED

CSR Policy

Corporate Social Responsibility (CSR) Policy

Policy Effective Date: 1st December 2023

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1. Objective

Objective and Purpose

The key purpose of this Policy is to:

- Outline the developmental areas in which Alation India Private Limited shall get involved in through its CSR activities.
- Define governance structure for CSR management within Alation India Private Limited.
- Serve as a guiding document aiding in identification, execution and monitoring the CSR projects.
- Describe the treatment of surpluses from CSR activities.
- Applicable to all employees

2. Scope and Applicability

This Policy applies to all CSR projects that will be undertaken by Alation India Private Limited and shall fulfil all the requirements of Section 135 of the Companies Act, 2013. **Alation India Private Limited** 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. This Policy will be periodically reviewed and updated in line with the relevant codes of legislation and best practices that can be adopted by **Alation India Private Limited**.

CSR Policy is applicable to **Alation India Private Limited** and its branches which are mandated with the CSR expenditure obligations as per Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

3. Policy / Process

3.1. Alignment with Organization Values

Alation India Private Limited is guided by its core values that it has adopted since its inception. The CSR Policy is in alignment with its core values and is central to its CSR strategy.

Being Accountable for what we do: **Alation India Private Limited** strongly believes that it is accountable for contributing back in a meaningful way to the society.

For execution of its CSR objectives and to make a positive impact with its CSR activities, **Alation India Private Limited** desires to involve its employees too in an effort to create a sense of involvement and bring about social responsibility amongst them. Wherever necessary, **Alation India Private Limited** will partner and collaborate with NGOs / other similar organizations that have experience, knowledge and a wider reach to meet its CSR objectives.

3.2. Areas of Focus

Alation India Private Limited has broadly selected four areas of focus under its CSR activities, as under:

Education:

Promoting education including technology digital literacy, special education and employment enhancing vocation skills especially among lower strata or poorer sections of the society or of the differently abled adults or eligible children towards their livelihood enhancement projects.

Technological digital literacy involves proficiency in using digital devices (smartphones, laptops, tablets) to access the Internet to discover, create, review, evaluate, and use information via different digital platforms. It is extended to cover information literacy, media literacy and digital literacy.

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.

Health 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 preventive health care and sanitation and making available safe drinking water Including contribution to Swach Bharat Kosh set up by the Central Government for the promotion of 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, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans and their dependents Including widows;
- Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- Contribution to the Prime Minister's National Relief Fund or Prime Minister's Central Assistance and Relief in Emergency Situations Fund (PM CARES 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 or Research and Development Projects in the field science, technology, engineering and medicine funded by the Central Government or State Government or Public Sector undertaking or any agency of the Central or State Government;
- Contribution to public funded universities as specified in schedule VII of the Companies Act, 2013 from time to time.
- 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

Organization shall provide relief, support, rehabilitation etc. in case of natural calamities or emergencies.

3.3. Governance Structure

CSR Committee constituted by the Board of Directors at **Alation India Private Limited** is responsible for implementing and administering CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013.

The Board of Directors of **Alation India Private Limited** and **Alation Inc** are ultimately accountable for the CSR projects undertaken by Organization.

Alation India Private Limited has constituted a CSR Committee at the Board level. The CSR Committee is supported by the CSR Team, comprised of representatives from this company.

3.4. CSR Committee

Organization has constituted Corporate Social Responsibility Committee (the "CSR Committee") in line with Section 135 of the Companies Act, 2013 (the "Act"). The CSR

Committee consists of following members of the Board:

- Allan Han-Feng Tang
- Emmet John Galvin
- Prajakta Sandeep Kadlaskar

The CSR Committee of **Alation India Private Limited** shall be responsible for:

- Review of CSR activities in the Company.
- Formulation of CSR Policy.
- Monitoring of implementation of CSR Policy.
- Recommend to the Board, modifications to CSR Policy as and when required.
- Appraise to the Board the CSR expenditure done during the year.

3.5. CSR Team

Dedicated CSR team shall be constituted from among the employees at **Alation India Private Limited**, for implementing the CSR Policy and shall work under the guidance of CSR Committee and will be mainly responsible for:

- Execution of 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 CSR Committee.
- Compilation of information & preparation of Annual Reports on CSR activities and presenting the same to CSR Committee.

- Any other activity necessary to ensure achievement of CSR objectives.

3.6. CSR Budget

The total budget for the CSR projects in each financial year will be decided by the CSR Committee in accordance with applicable provisions of the Act and the CSR Rules. The CSR Committee shall propose to distribute the budget among the Areas to Focus or such of them as the CSR Committee may deem fit in each financial year, in such proportion and in a manner that meets the objectives of the CSR Policy.

For any reason, if the CSR team is not able to follow the allocation agreed on in any of the Areas to focus described above, the same shall be utilized in such other Areas to focus as the CSR team may recommend with the reasons therefore, and the CSR Committee may approve.

4. Implementation Process

4.1. CSR Contributions

Alation India Private Limited will endeavor to contribute and spend at least 2% of the average net profits of Alation India Private Limited made during the three immediately preceding financial years or such amount as may be recommended by the CSR Committee from time to time in pursuance of this Policy.

4.2. Compliance, Monitoring and Reporting

4.2.1. Compliance

The CSR Team will plan, implement, monitor and manage all CSR projects & activities for Alation India Private Limited and will work closely with the CSR Committees of the Boards of Alation India Private Limited and the Group companies as applicable.

The CSR Team will formulate implementation plans for the projects by clearly defining the following:

- Activities to be undertaken.
- Budgets proposed.
- Time frame for implementation.

- Responsibilities and authorities for implementation.
- Results expected to be achieved post-implementation

4.2.2. Monitoring

Milestones will be decided for every project/activity undertaken, and the progress will be evaluated against the milestones defined in the implementation plan for each project/activity. The CSR Team will monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports etc. Alation India Private Limited will establish mechanisms to track data and monitor projects so that the CSR projects undertaken are implemented transparently and efficiently.

4.2.3. Reporting

The CSR Committee of the Board, based on reports presented by the CSR Team, will annually publish report on the CSR projects as a part of the Board's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act 2013.

The CSR Committee shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR Policy is in compliance with the approved Corporate Social Responsibility CSR Policy of **Alation India Private Limited**.

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

4.3. Treatment of Surplus / unspent amounts

Any surplus generated from CSR projects undertaken w. e. f. FY 2023-24 will be tracked and channelized into the CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits. Similarly, any unspent amounts shall be transferred to any fund Included In the Schedule VII of the Companies Act, 2013.

5. Special Circumstance and Exception

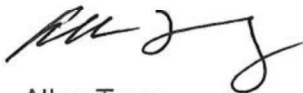
Any Deviation to this policy has to be approved by the CSR Committee in consultation with the HR. Any changes to the policy has to be recommended by the

CSR Committee for the approval of the Board in consultation with Legal and Compliance.

6. Non-compliance and Consequence

Violation of this overtime policy is subject to disciplinary action, up to and including termination. If an employee, including Floor Supervisor and/or Manager, is suspected of violating the policy, he/she must undergo a thorough investigation. The circumstances of each violation will determine the severity of each scenario.

For Alation India Private Limited



Allan Tang