

Aptean India Private Limited

CORPORATE SOCIAL RESPONSIBILITY POLICY

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1. PREAMBLE

Aptean India Pvt. Ltd. (the Company) is dedicated to being a responsible corporate citizen through its services, conduct and initiatives, and by amplifying our people's passions and contributions in the global communities in which we live and work.

2. TITLE AND APPLICABILITY

We recognize the importance of good corporate governance and corporate social responsibility (CSR) in building a thriving global community and strengthening the trust of its stakeholders. For the Company, CSR goes much beyond financial contribution; it is about living our values.

The Company's corporate social responsibility Policy ('Policy') has been framed and formulated in accordance with section 135 of the Companies Act 2013 and the rules made there under.

The Company's corporate social responsibility Policy has been aligned with the schedule VII of section 135 of the Companies Act 2013.

The Policy shall apply to all the CSR initiatives and activities of the Company.

3. PURPOSE

The main objective of the company's CSR policy is

- a. to lay down guidelines to make CSR a key business process for sustainable development of the society.
- b. to directly/indirectly undertake projects/programs which will enhance the quality of life and economic well-being of the communities in and around our office and society at large.
- c. to generate goodwill and recognition among all stake holders of the company.

4. SCOPE

This Policy will apply to all projects / programmes undertaken as part of the Company's corporate social responsibility activities and will be developed, reviewed and updated with reference to relevant changes in corporate governance, international standards or best practices. The Policy will be compliant and align with the activities and rules of Schedule VII and Section 135 of the Companies Act 2013.

5. GOVERNANCE

5.1. ROLES AND RESPONSIBILITIES: BOARD OF DIRECTORS

The Board of Directors of the Company will be responsible for:

- Validating the CSR Policy for the Company;
- Ensuring that the Company spends, in every financial year, at least two percent of the average net profits of the Company made during the three immediately preceding financial years in pursuance of the Policy;
- Display the CSR Policy of the Company in such a manner as prescribed under Section 135 of the Companies Act 2013 read with the CSR Rules, wherever applicable;

6. CSR BUDGET

The Board of Directors of the Company shall ensure that in each financial year, the Company spends at least 2% of the average net profit made during the immediate three preceding financial years. This amount for CSR will be approved by the Board as part of the Company's annual budget / plan. The Company will allocate the budget as per the Policy and ensure programmes / projects are aligned with Schedule VII and Section 135 of the Companies Act, 2013.

7. IMPLEMENTATION

The Company will implement its CSR projects through CSR Agency within India.

8. MONITORING

The Board will institute a well-defined, transparent monitoring and evaluation mechanism to ensure that each CSR project / programme has:

1. Clear objectives for the implementation of all the CSR programs;
2. Clear targets, time lines and measureable parameters and impact indicators wherever possible;
3. A progress monitoring and reporting framework that is aligned with the requirements of the Section 135 of the Companies Act and the CSR Rules.

9. REPORTING

The Company will monitor the progress of its CSR projects and expenditure.

The Company shall report its CSR performance in its annual Board of Director's report as per the structure and format prescribed in the notified CSR Rules and Section 135 of the Companies Act 2013.

10. CSR ACTIVITIES

CSR Activities recommended as per Companies Act, 2013 (Schedule VII)

- Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and making available safe drinking water;
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry and conservation of natural resources;
- Rural development projects;
- Contribution to the Prime minister's National Relief Fund or any other Socio economic development and relief and funds for the welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women; and
- Such other matters as may be prescribed as per the Companies Act 2013

11. CSR PROGRAMMES / PROJECTS

The Company's programmes / projects areas shall be aligned with the national development priorities and the needs of the communities and will be in sync with schedule VII of Section 135 of the Companies Act 2013.

In alignment with the Company's purpose, the CSR activities and initiatives will contribute to building thriving communities in which our people work.