

NEVITON SOFTECH PVT LTD

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. PREAMBLE

Neviton Softech Pvt Ltd ('Company' or 'Neviton') has framed this Corporate Social Responsibility Policy ('Policy') in accordance with section 135 of the Companies Act 2013 and rules made thereunder.

Neviton, strongly believes community development programmes are integral to the sustainability strategy. The Company strives to go beyond compliance and create sustainable value for communities. Neviton CSR initiatives help address socio-economic challenges in the realms of Health and Hygiene, Education, Employability and Disaster Management.

The Policy encompasses our philosophy towards CSR and lays down guidelines and mechanisms for undertaking socially beneficial programmes for welfare and sustainable development of the community at large.

2. CSR Vision:

To contribute to the community in which we operate and provide high quality solutions to the issues impacting their lives, which results in the overall development of the society.

3. CSR Mission:

To innovate for our society, deliver high quality services and impactful interventions over a long period of time and ensure sustained relations with the society.

4. Objectives:

The following objectives identified are in accordance with the CSR Vision and Mission. The Company believes that growth of the community should go hand-in-hand with the growth of the company. Hence, the company prioritizes to;

- Support the communities around its areas of operation, there by create a positive impact in the community
- Identify interventions to ensure sustainable social development after considering the immediate and long-term socio environmental consequences.
- Setting high standards of quality in providing interventions and support to meet the needs of the community.

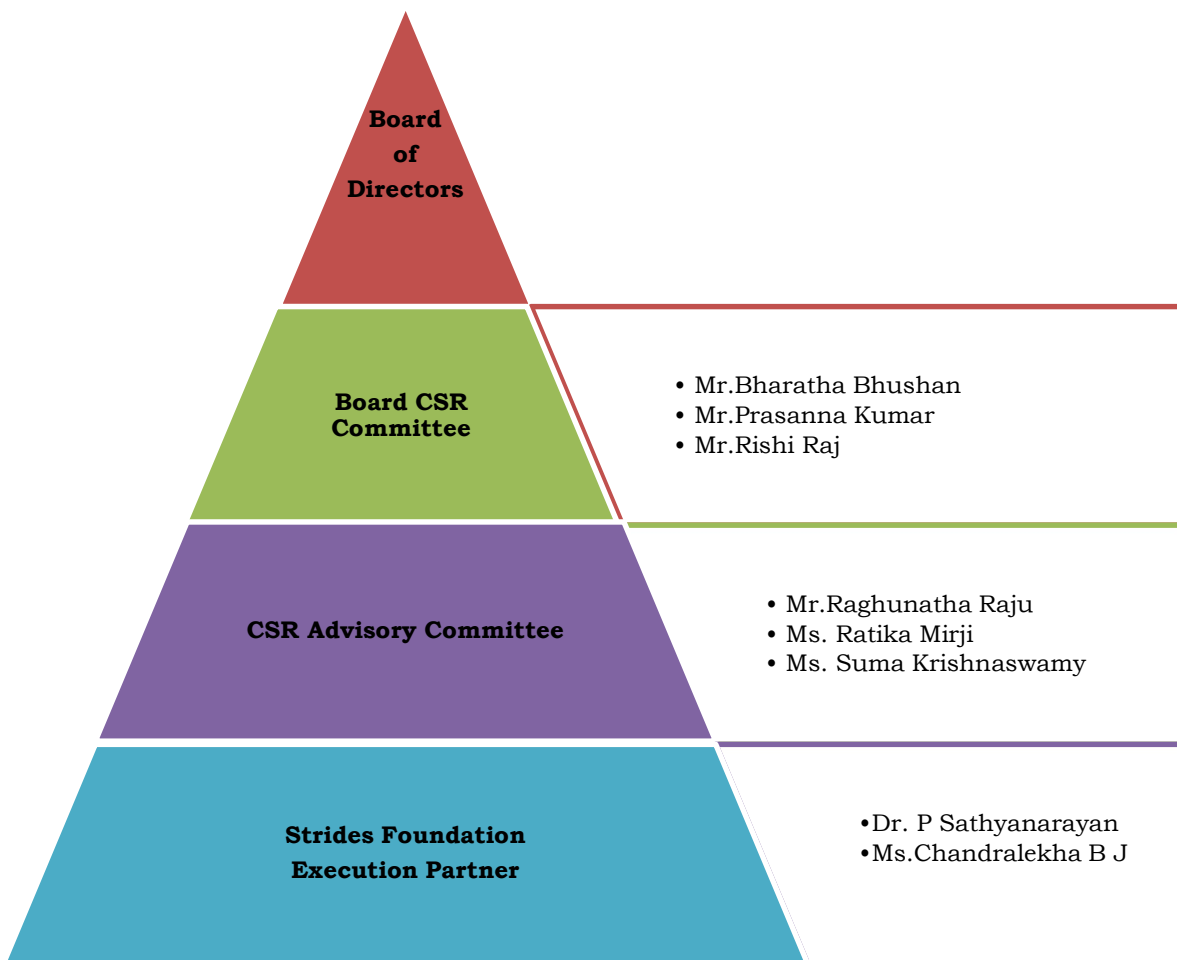
5. Philosophy:

The company intends to undertake its corporate social responsibility in a strategic manner. The company will leverage its strategic, financial, human resources, marketing, research and business skills to create maximum impact for its beneficiaries both internal and external.

6. Governance structure:

CSR strategy, procedures and commitments should be regularly reviewed. Risks and opportunities in these areas will change and evolve and the business will need to be able to meet these as they emerge.

The Governance structure and its team members are given below –



Each of the above constituents has a specific role to play with clearly defined roles and responsibilities

Board of directors:

- Approval of the CSR policy, proposed causes and programs to be undertaken by the company, modalities of operation and the budget for the activities.
- Ensure that activities included by the company in its Corporate Social Responsibility Policy are related to the activities included in Schedule VII of The Companies Act, 2013
- Ensure that the activities included in Corporate Social Responsibility Policy of the company are undertaken by the company
- Ensure that the company spends, at least two per cent (2%) of the average net profits of the company made during the three immediately preceding financial years, in pursuance of this policy in every financial year.
- The Board's Report issued under clause (o) of sub-section (3) of section 134 shall include an annual report on CSR containing particulars specified in Annexure to the CSR Rules.
- If the company fails to spend such amount, specify the reasons for not spending the amount in its annual report mentioned above.

Board CSR Committee:

- Formulating a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII and recommending the same to the Board for approval.
- Recommending the amount of expenditure to be incurred on the activities referred above.
- Monitoring the Corporate Social Responsibility Policy of the company from time to time, ensuring that it is updated for any change or enhancement in scope and the same is recommended to the board for approval.
- Defining the modalities and monitoring the progress of the activities being undertaken under the policy

CSR Advisory Committee:

- Be the first point of contact for the operating CSR teams for advice and guidance.
- Provide guidelines and framework for the rest of the organisation to work within.
- Recommend programs, modality of operation and monitoring mechanism.
- Ensure availability of adequate resources
- Support the CSR committee to ensure full compliance of the regulation

Strides foundation:

- Helping conceptualize the programs that the company intends to support.
- Executing the programs through its employees or in collaboration with other partners such as NGOs, the government, community-based organizations, sector experts and any other partners as are deemed necessary.
- Collecting and analysing data for monitoring and reporting of all programs.
- Providing capacity building support to the program team.
- Providing periodic reports to the CSR Committee.

7. DEFINITIONS

- a) **“Act”** shall mean the Companies Act, 2013 read with the relevant Rules framed thereunder and as amended from time to time.
- b) **“Board”** shall mean the Board of Directors of the Company.
- c) **“Company”** shall mean **Neviton Softech Pvt Ltd.**
- d) **“CSR Committee or the Committee”** shall mean the Committee constituted by the Board of Directors of the Company in accordance with Section 135 of the Act.
- e) **“CSR Rules”** shall mean The Companies (Corporate Social Responsibility Policy) Rules, 2014 and as amended from time to time.

- f) **“Ongoing Project”** means a multi-year project undertaken by a Company in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced.

Ongoing Project shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on justification.

- g) **“Permissible CSR Activities”** means such activities as specified in Schedule VII of the Act, as amended from time to time and as may be allowed by the Ministry of Corporate Affairs, Government of India or such other statutory authority from time to time through notification, circulars or press releases.

- h) **“Strides Foundation”** is a Trust established in 2010 as a not-for-profit organization which is the CSR Implementation Agency for the Company

As prescribed under the CSR Rules, Strides Foundation is registered with Ministry of Corporate Affairs for undertaking CSR activities under registration no. CSR00006315.

Note on Interpretation:

Unless the context otherwise requires, words and expressions used in this Policy and not defined herein but defined in the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, as may be amended from time to time shall have the meaning respectively assigned to them therein.

If due to subsequent regulatory changes, any part of this Policy become inconsistent, then provisions of the Companies Act, 2013 and the Rules framed thereunder shall prevail.

8. OBJECTIVES OF THE POLICY

- a) Serve as the principal guiding document for Neviton CSR initiatives;
- b) Describe core themes and related impact areas as per Schedule VII;
- c) Outline projects and geographies for undertaking CSR initiatives;
- d) Provide framework for selection, implementation, management and monitoring of CSR initiatives.

9. FOCUS AREAS OF ENGAGEMENT

The Company shall carry out Permissible CSR activities as approved by the Board / CSR Committee.

Neviton CSR initiatives help address socio-economic challenges in the realms of Health and Hygiene, Education, Employability and any other activities approved by the Board / CSR committee.

Some of the areas that the company proposes to invest its CSR budget includes:

Cause	Proposed Program	Proposed Outcomes
Health & Hygiene	<ul style="list-style-type: none"> • Establishing better healthcare systems • Conducting health camps like general health check-ups, Anemic Check and monitoring - women and children, eye camps or any other camp required by the community • Drinking water facilities 	<ul style="list-style-type: none"> • Holistic coverage of the community's healthcare needs • Providing safe drinking water
Education	<ul style="list-style-type: none"> • Improving School infrastructure in the stakeholder community <p>OR</p> <ul style="list-style-type: none"> • Adopting existing schools and Anganwadis by providing infrastructure, amenities, training teachers, etc. • Programs to improve learning and motivational levels of specific sections of students in existing schools • Remedial education 	<ul style="list-style-type: none"> • Improved quality of education and learning outcomes • Increased retention • Schools will be better equipped to cater to students • Access to relevant learning material • Teachers will be empowered • Improved in-school performance through mentoring • Providing wider exposure beyond classrooms

		<ul style="list-style-type: none"> • Training of teachers to become better leaders
Livelihood	<ul style="list-style-type: none"> • Sponsoring students to pursue technical education • Develop and sponsor add-on modules to existing courses • Vocational training to the youth, school students • Women empowerment through Self-help groups. 	<ul style="list-style-type: none"> • Increased service rates, enhanced incomes for the community • Empowerment of the youth and its positive impact on development of the community • Empowerment of school students • Empower women to attain self-sufficiency financially

*Apart from the above, Company may also engage and spend CSR fund in areas mentioned in **Schedule VII** of the Companies Act, 2013, subject to approval of the Board/ CSR Committee.*

10. CSR PROJECTS SELECTION & IMPLEMENTATION

The Company shall undertake CSR activities directly or through Strides Foundation or such other Implementation Agencies as approved by the CSR Committee of the Company.

Neviton Team and Strides Foundation shall receive requests from the community for CSR Programs.

Strides Foundation shall evaluate the proposals by assessing the needs of such requests, potential impact and forward the proposal to the CSR Committee for its recommendation. The CSR Committee shall deliberate on the proposals and approve them for implementation at its discretion.

Strides Foundation shall assist the Neviton Team in implementing the proposal either directly or in collaboration with other partners/ registered trusts, society, as may be necessary.

Strides Foundation shall monitor and provide periodic reports to the Committee to enable the Board of Directors of the Company to meet their monitoring, reporting and other legal obligations.

11. CSR SPEND

1) CSR Spend

Board of Directors of the Company shall ensure that in each financial year, the Company spends at least 2% of its average net profit made during the three immediately preceding financial years towards CSR activities.

Explanation: For the aforesaid purpose, Net Profit shall be calculated in accordance with the provisions of Section 198 of the Act.

2) Excess CSR Spend

In case the Company spends an amount in excess of the requirements of its CSR obligations in a financial year, such excess CSR amount may be set off against the prescribed CSR spend upto the immediately succeeding three financial years, subject to compliance with the conditions stipulated under the CS Rules.

3) Unspent CSR Amount of Ongoing Projects & Recurring/ Annual Projects

- a) Unspent CSR amount relating to Ongoing Projects shall be transferred to “Unspent CSR Account” of the Company (within 30 days from the end of FY) and spent as per the provisions of Act, failing which such amount shall be transferred to the Fund specified in Schedule VII of the Act within 30 days from the completion of third FY.
- b) Unspent CSR amount relating to Recurring/ Annual Projects shall be transferred to the Fund specified in Schedule VII of the Act within six months from the end of FY.

Unspent CSR Amount shall be reported by the Board of Directors in their Report under Section 134 of the Act, specifying the reasons for not spending the amount.

12. ANNUAL ACTION PLAN (AAP)

The CSR Committee shall formulate and recommend to the Board, an AAP in pursuance of its CSR Policy, which shall include the following:

- a) the list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;

- b) the manner of execution of such projects or programs as specified in the CSR Rules;
- c) the modalities of utilization of funds and implementation schedules for the projects or programs;
- d) monitoring and reporting mechanism for the projects or programs; and
- e) details of need and impact assessment, if any, for the projects undertaken by the company;

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

13. PROJECT MONITORING AND IMPACT ASSESSMENT

A. Monitoring Process

- 1. For each of the CSR Projects, Company shall agree with Strides Foundation, a plan and budget for the year;
- 2. Strides Foundation shall implement the projects directly or in collaboration with other partners/ sector experts, as are deemed necessary, and shall submit periodic updates to the Committee.
- 3. The Committee shall review progress/ outcome of Company's CSR activities during its meetings.

B. Impact Assessment

The Company shall undertake impact assessment of its CSR projects in compliance with the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, as may be amended from time to time only in case of long term projects preferably after 3 years.

The impact assessment reports shall be placed before the Board and shall be annexed to the Annual Report on CSR.

The Company undertaking impact assessment may book the expenditure towards Corporate Social Responsibility for that financial year, which shall be as per the provisions of the CSR Rules, as may be amended from time to time.

14. REPORTING

The Company shall report CSR performance in its Annual Report in the prescribed format.

15. PERIODIC REVIEW OF POLICY

This Policy shall be subject to review as may be necessary and in accordance with any regulatory amendments.
