

# Corporate Social Responsibility Policy (‘CSR Policy’)

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## Preamble

Indecomm Global Services is a leading global provider of consulting, outsourcing, learning, and technology services. With operations spanning in 27 locations across 10 countries, we leverage our practical and relevant technology platforms, process excellence, deep domain expertise, and strategic enterprise partnerships to deliver superior business results for our clients and Indecomm Global Services (India) Pvt. Ltd ('the Company') is part of the Indecomm group and a subsidiary of Indecomm Corporation.

At Indecomm, we are aware of our Corporate Social Responsibility ('CSR') obligations and the Company will identify eligible CSR activities either funding it directly or through appropriate agencies for achieving this end. The Companies Act, 2013 ('the Act') has introduced the CSR which is effective from April 2014. The Act requires the qualifying companies to constitute Corporate Social Responsibility Committee to oversee and manage the CSR activities of the Company. The Companies (Corporate Social Responsibility Policy) Rules, 2014 ('CSR Rules') lays down the framework and procedures for carrying out the CSR activities as specified in Schedule VII of the Act.

The catchphrase of the Company, "*Partnerships@work*" embodies the culture and the spirit that we endeavor to capture in every single engagement and interaction with our clients and we are now extending the same to engage with the societies and communities we operate.

This policy sets out the framework for the Company to be a good corporate citizen and to fulfill our responsibilities to the societies and communities in which we operate.

## Purpose of the Policy

- To define the approach towards Corporate Social Responsibility ("CSR")
- Define the kind of projects that will come under the ambit of CSR
- To set out the governance structure and utilization of CSR funds
- Explain the manner in which the surpluses from CSR projects will be treated

## Objectives

- Ensure absolute commitment at all levels to operate its business in a manner, which will recognize the interests of all stakeholders.
- Address critical social, environmental and economic needs of the underprivileged sections of the society.
- To initiate and drive programs that benefit communities and results in enhancing the quality of life and economic well-being of the society.

## Scope

The scope of this CSR policy will include the following areas and the Company may take up CSR initiatives, at its discretion, with respect to one or more of the following areas:

- Eradicating hunger, poverty, and malnutrition, promoting 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, agro-forestry, conservation of natural resources and maintaining quality of soil, air and water
- 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
- Measures for the benefit of armed forces veterans, war widows and their dependents.
- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports
- 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 Castes, the Scheduled Tribes, other backward classes, minorities and women
- Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- Rural development projects
- Others areas as maybe identified in the future.

## Governance Structure

Company's CSR activities will be managed by the CSR Committee that will be responsible for the CSR projects undertaken, in compliance with the requirements of Section 135 of the Companies Act, 2013. The CSR Committee will report to our Board of Directors ('Board').

The responsibilities of CSR Committee will, interalia, include the following:

- a. To formulate and recommend to the Board, a CSR policy which shall indicate the activities to be undertaken by the Company towards CSR initiatives as per Schedule

- VII of the Act and monitor the CSR policy and advise on the changes, if required, from time to time;
- b. To review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the Company;
  - c. To review the expenditure incurred on the CSR activities undertaken by the company;
  - d. To monitor the CSR policy of the Company from time to time;
  - e. To monitor the mechanism adopted for implementing the CSR activities and reporting on the CSR activities;
  - f. Any other matter as may be entrusted to the CSR Committee by the Board from time to time.

## **CSR Committee and Members**

1. Mathew Panayil - Director
2. Jaison Verghese - Director

The Committee can co-opt any other officer of the Company to assist it in the CSR activities.

## **CSR Budget and Allocation**

The CSR Committee will recommend to the Board the overall amount to be allocated for each financial year for the CSR activities. The overall spend will be worked out by the CSR Committee and intimated to the Board which will not be less than two per cent (2%) (or such other percentage as may be prescribed by the Act and /or CSR Rules) of the average net profits made during the three (3) immediately preceding financial years (“CSR budget”). The CSR Committee will identify the activities that will qualify for funding in accordance with the CSR Policy and the amount to be allocated for such projects for achieving the Company’s CSR objectives.

## **CSR Monitoring**

The CSR Committee shall meet as often as may be necessary but at least twice a year to review the implementation of the CSR programs. At the end of every financial year, the CSR Committee shall prepare a report in the format annexed to Companies (Corporate Social Responsibility) Rules 2014 on the CSR programs carried out and submit the same to the Board. The CSR programs of the Company shall also be reported in the Annual Report of the Company.

If in any financial year the expenditure on CSR activities is less than the CSR budget, then CSR Committee will inform the Board about the reasons for such shortfall and the Board will

take a decision whether to carry forward such deficit in accordance with the provisions of the Act and/or CSR Rules.

## **Miscellaneous**

Any or all provisions of the CSR Policy would be subject to revision/ amendment in accordance with the guidelines on the subject as may be issued by the appropriate Government, from time to time.

The Company reserves the right to review the CSR Policy from time to time based on changing needs and aspirations of the target beneficiaries and make modifications, as may be necessary.