

Corporate Social Responsibility (CSR Policy)

1. Policy Statement

In accordance with the provisions of Section 135 of Companies Act, 2013, the Board of Directors of the Company at their meeting held on 17 August, 2017 made this CSR policy statement.

2. Scope

This policy will apply to all activities undertaken as part of Customer Analytics India Private Limited CSR activities and will be developed, reviewed and updated by reference to relevant codes of corporate governance and international standards or best practices. This policy is also in line with the CSR Rules under Sec. 135 of Companies Act 2013 ("CSR Rules"). The CSR activities will be related to community support, environmental support and disaster support, so that those efforts can make any defined positive impact to the society.

3. CSR Objectives

The following are focus areas for our CSR initiatives:

Special needs Assist: Why change people with special needs for the world, why not change the world for them? Partner with organizations looking to provide the means and devices to help those with special needs live a full and productive life.

Education: "Education is the most powerful weapon which you can use to change the world." Provide assistance to those who have the inclination and abilities but lack the means to an education to better their lives.

Health and Wellness of the Elderly: "To care for those who once cared for us is one of the highest honours." Assist the elderly with health insurance and the means to access healthcare

Health and wellness of women and girls: "A girl should be two things - who and what she wants." Collaborate with organizations that empower woman and the girl child, providing care to build confidence and the future they deserve.

4. Definitions

Corporate Social Responsibility (CSR) means and includes but is not limited to: Projects or programs relating to activities specified in Schedule VII to the Companies Act, 2013 (Act)

CSR Policy relates to the activities to be undertaken by the Company as specified in Schedule VII to the Act and the expenditure thereon.

Net Profit means the net profit of the Company as per its financial statement prepared in accordance with applicable provisions of the Act (Section 198), but shall not include the following viz;

- I. Any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise and
- II. Any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act.

Provided that net profit in respect of a financial year for which the relevant financial statements were prepared in accordance with the provisions of the Companies Act, 1956 shall not be required to be recalculated in accordance with the provisions of the Act.

7. Responsibilities:

- a. Formulate and recommend a CSR policy indicating the activities to be undertaken by the Company,
- b. Recommend the amount of expenditure to be incurred on the activities.
- c. Monitor the CSR Policy from time to time.
- d. Such other functions as the Board may deem fit.

The CSR programs shall include activities as specified in Schedule VII of the Companies Act, 2013.

8. Role of the Board

- a. Ensure that the CSR activities included in this Corporate Social Responsibility Policy are undertaken by the Company.
- b. The Board of the Company may decide to undertake its CSR activities, through a registered trust or a registered society or a Company established under section 8 of the Act by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, or otherwise provided that If such trust, society or company is not established by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, it shall have an established track record of three years in undertaking similar programs or projects/activities;
- c. Ensure that in each financial year the Company spends at least 2% of the average net profits of the company made during the three immediately preceding financial years, calculated in accordance with Section 198 of the Act, in pursuance of its CSR policy. Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the Company where it operates,
- d. As per Section 135 of the Act, specify the reasons for under spending the CSR amount in the Board's Report.

9. CSR Budget

CSR budget includes all, direct and indirect, amounts incurred by the Company on CSR activities undertaken in accordance with CSR policy approved by the board.

10. Implementation

The CSR Activities would be chosen for implementation by the Company in compliance with the provisions of Section 135 read together with Schedule VII of the Companies Act, 2013.

11. Monitoring & Reporting

The board of directors will be responsible for the monitoring CSR activities and report accordingly from time to time.

CSR spend and achievements will be reported as part of the Annual Report and also as per any statutory and regulatory reporting requirements. The Board of Directors shall review the implementation of CSR as and when required.

12.CSR Activities

Customer Analytics India Private Limited will implement its CSR activities in compliance with the Schedule VII of Companies Act, 2013 through registered trusts. This will be reviewed from time to time by the Board and specific initiatives under these will be undertaken in line with the CSR Policy to meet the overall objectives of these interventions.

13.Amendment of CSR Policy

The CSR policy of the company may be amended at any time by the company with the approval of the board of directors.

14.Reporting of CSR Policy

On approval of the CSR policy or any amendments thereof, the contents of the policy shall be included in the Boards' report.

At the end of each financial year, the board shall prepare a report of the CSR program in the prescribed form relating to the financial year and submit to the board of directors for its inclusion in the Board's report in the format recommended in the Companies (Corporate Social Responsibility Policy) Rules, 2014, as may be amended from time to time, as part of its annual report.