

CAPCO TECHNOLOGIES PRIVATE LIMITED (“COMPANY”)

CORPORATE SOCIAL RESPONSIBILITY POLICY

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1. [Company's Charter on Corporate Social Responsibility](#)

At Company, we think that it is critical to engage with the social and ecological challenges that humanity is facing. It is our conviction that engagement with social issues must be deep, meaningful, and formed on the bedrock of long-term commitment; for that is the only way by which real change can happen on the ground. It is also reflective of the fact that such an approach serves both, enlightened business interest and social good. We run our social programs on a strong foundation of ethical principles, good governance, and sound management.

2. [Definitions](#)

“CSR Activities” shall mean the projects and / or programmes undertaken by the Company either directly or indirectly pursuant to Applicable Laws in accordance with this CSR Policy.

“Capco Technologies Private Limited,” herein referred to as "Capco India”.

The “CSR Team” means a group of employees who volunteer to meet the company’s annual CSR requirement. The CSR team should be comprising of 20 to 25 members, who should be connecting with various NGO’s, perform due diligence check of the NGO’s and the proposed CSR projects by the NGO’s.

“Rules” means Companies (Corporate Social Responsibility Policy) Rules, 2014, or any other rules prescribed under section 135 of the Act and pertaining to corporate social responsibility, as may be amended, and prescribed, from time to time.

3. [Company's CSR Policy](#)

Company’s engagement with social and ecological issues goes back a long time. The central tenets of our approach have been the emphasis on strong, meaningful work on systemic social issues. Our CSR policy articulated below therefore reflects these principles and strategies that have informed our long history of corporate citizenship and social responsibility over the years. (The [Annexure to the CSR Policy](#) provides more details on our CSR initiatives)

At Company, we think that the first and foremost responsibility of an organization is to run its business ethically and in compliance with the law in letter and spirit. Our framework of ethical business starts with a set of foundational values as embodied in Spirit of Capco India and comprises, at the least, the following three principles:

- Unyielding integrity in every aspect of business
- Treating people everywhere fairly and with respect – at the workplace as well as in communities outside; and
- Demonstrating ecological sensitivity in thought and action

Our approach to social responsibility and sustainability rests on three important pillars

- **The Strategic:** We choose domains and issues to engage with that are force multipliers for social change and sustainable development. Social responsibility is as much about being a sustainable organization as it is about external initiatives. Therefore, some of our areas of engagement lie at the convergence of business goals and social purpose.
- **The Systemic:** Within the chosen domains, we choose to engage on systemic issues that require deep, meaningful, and challenging work. Given the nature of social change, this implies commitment over the long term, typically for several decades because genuine change does take that long to occur.
- **The Deliberative:** Our emphasis on depth and on long term commitment implies a deliberative approach that precludes spreading ourselves thin or engaging in ‘cheque book philanthropy’. By implication, this also means that we are wary of expanding and growing our social programs as ends in themselves. We will continue to adhere to this approach going forward.

4. Guiding Principles

The Company shall follow the following guiding principles for selection, implementation and monitoring of CSR Activities as well as formulation of the Action Plan:

- i) In undertaking CSR Activities, the Company shall give preference to the local areas wherein the Company operates or has its offices i.e., areas in the vicinity of its factories, depots, and field offices.
- ii) The Company shall undertake only such CSR Activities, A) as are identified as Focus Areas under this Policy and B) as are permitted under the Applicable Laws. The Company shall also consider international, national, or state level priorities/ objectives, while identifying CSR Activities.
- iii) The Company shall not discriminate against the beneficiaries of the CSR Activities, on any grounds whatsoever, including race, gender, age, ethnicity, caste, religion, domicile, but may focus its CSR Activities to benefit the economically or socially weaker, or marginalised sections, of the society.
- iv) The Company shall endeavour utmost transparency in selection, implementation, monitoring, and reporting of CSR Activities.
- v) The Company shall ensure that all CSR Activities undertaken directly or indirectly, meet applicable standards of quality followed by Company and/or are the market standard for such activities.

vi) The Company shall undertake the project directly with a NGO and shall to its best of its ability also ensure that the NGO, satisfy the criterion specified by the Rules (if any) and have relevant experience, good credentials, no criminal track record, and follow the ethical standards which are at par with the Company's Code of Conduct.

vii) The Company shall ensure that all the CSR Activities are implemented as per the approved Action Plan, authorised by the Board.

5. Governance and Management

The CSR Committee is the apex body that oversees our CSR policy and programs.

The committee comprises of following directors:

- Mr. Dipak Kumar Bohra - Chairperson
- Mr. Ashish Chawla - Member
- Mr. Navin Gadia - Member

Additionally, the company has formed CSR Steering Committee, comprising the following members:

- Mr. Avinash Ryaka - Chairperson
- Mrs. Sarmistha Bhattacharjee - Member
- Mrs. Vishaka Naik - Member
- Mrs. Radhika Ananthakrishna - Member

The goals and objectives along with the annual budgets for CSR are discussed and signed off at the beginning of the year by the CSR committee with the Steering Committee in discussion with the CSR Team, and the Chairperson. This happens as part of the annual strategic and operating plan processes of the organization. The CSR committee allocates the budgets to programs and projects in domains that are aligned with the defined priorities and goals.

Along with approval of the annual plan, the CSR committee reviews progress on all key programs vis-à-vis its broad objectives including effective utilization of the funds and a formal assessment of outcomes and impacts as considered relevant by the CSR committee. The entire annual review process is completed by the CSR committee within the first quarter of the new financial year. Comprehensive, transparent reporting on sustainability and CSR is a cornerstone of good governance. In addition, CSR programs will be reported to the Ministry of Corporate Affairs as required under Section 135 of the Companies Act 2013.

6. Implementation and Focus Areas

CSR Team are responsible to connect with various NGO's and invite NGOs to share proposals to utilize the Capco India CSR budget. CSR Team form small sub-group within the CSR Team to perform necessary due diligence for respective CSR project proposal. After proper scrutiny, the CSR subgroup presents the proposal before the CSR Team in the weekly governance. Subsequently, follow up calls are arranged with respective NGOs to clarify queries, questions, etc. raised by the team members. Once we have all the clarifications for the respective queries, the team members discuss, agree, and accepts the CSR proposal. The proposal is then presented in the quarterly CSR Committee meeting.

The CSR Committee being the final authority will decide if a CSR project is approved or rejected. In case CSR committee has any questions and queries, these are clarified with the respective NGO and subgroup, until then the proposal is kept on Hold. Upon clarifying the queries, the CSR Committee will approve the proposal. Once approved, the approval is shared with the Finance team to disburse the funds to the respective NGOs within 15 (fifteen) working days.

The following MANDATORY documents forms the part of the due diligence exercise:

1. PAN
2. 80G Certificate
3. CSR Certificate
4. Registration Certificate
5. Form 10 AC

The below documents may be included in the due diligence exercise whenever required.

6. Annual Report of pervious 2 (Two) years [if NGO incorporated more than 2 (two) years already]
7. List of donors.
8. List of beneficiaries of the proposed project.

7. CSR Expenditure

Every year the Company shall spend at least 2% of its average Net profit as defined under the Rules (“CSR obligation”) during the three immediately preceding financial years, on the CSR Activities as per approved Action Plan.

The expenditure incurred towards administrative overheads and carrying out the Impact Assessment will be considered as part of CSR Expenses up to the limits prescribed under the applicable laws.

Any amount remaining unspent at the end of the financial year, if any, except in case of an ongoing project, shall be transferred to a Fund to be specified in Schedule VII for this purpose, within a period of six months of the expiry of the relevant financial year.

In case the Company undertakes any ongoing project, any amount remaining unspent and earmarked for the ongoing project, shall be transferred within a period of thirty days from the end of the financial year to a special account to be opened for that financial year in any scheduled bank to be called the ‘Unspent Corporate Social Responsibility Account’, and such amount shall be spent within a period of three financial years from the date of such transfer, failing which, the unspent amount shall be transferred to the Fund to specified in Schedule VII for this purpose, within a period of thirty days from the date of completion of the third financial year.

Any surplus arising out of CSR projects, programmes or activities shall not form part of the business profits of the Company and shall be utilized towards the eligible CSR Activities / addressed in accordance with Applicable Laws.

8. Approval of CSR Activities

The CSR Activities to be undertaken by the Company shall be approved by way of Action Plan by the Board as per the policy.

The thematic areas mentioned in the attached annexure (Annexure to the CSR Policy) should be followed while preparing the Action Plan.

The Board shall be the absolute authority to update, alter, modify, amend, withdraw, and replace the Action Plan for identified reasons.

The CSR Committee is the final decision-making authority to approve or reject any CSR project for funding.

9. Monitoring of CSR Activities

Under the overall supervision of the Board, the CSR Team, shall be responsible to monitor the CSR Activities. The CSR Team shall devise a robust monitoring mechanism to ensure that the CSR Activities are undertaken effectively in accordance with approved Action Plan in compliance with the Applicable Laws and the provisions of this Policy. The CSR Activities will be effectively and objectively monitored using appropriate monitoring tools, as the case may be, that may include one or more of the third-party audits(s) or certification(s), impact assessment(s), self-assessment report(s), field visit(s), periodical review(s) or any other appropriate mechanism. The Company shall review the progress on Action Plan preferably on annual basis. The Board shall review the status of implementation and fund utilization of the various projects and programmes as per approved Action Plan at least once in a year.

The NGO should provide an undertaking that the disbursed CSR funds are to be used only for Approved purpose and there shall not be any deviation in the fund utilization. In the event of any price escalation or any additional cost incurred during the implementation of the project, the NGO will be liable to bear the additional cost.

10. Responsibilities of the CSR Team

Responsibilities of the CSR Team for the purpose of CSR Activities of the Company, the CSR Team shall work under the overall supervision and guidance of the Steering Committee, fully authorised to issue any instruction, guidelines, direction, order, advisor etc. which shall be binding on the NGO and shall ensure the following:

- i) All CSR Activities of the Company comply with this CSR Policy and the Applicable Laws.
- ii) The CSR Team works only with credible institutions, non-governmental organizations (NGOs), government agencies, domain experts and visionaries and other philanthropic foundations to enhance the outreach of the Company's CSR Activities in line with the CSR Policy.
- iii) Undertake the CSR Activities as per the approved Action Plan.
- iv) Update the Board on the progress of CSR Activities and status of implementation of the Action Plan.
- v) Maintain records of all CSR Activities undertaken on behalf of the Company.
- vi) Do all such acts, deeds and things as may be directed by the Board in pursuance of the CSR Policy and for the effective implementation of the Action Plan.

11. [Annexure to the CSR Policy](#)

Table: Mapping Company’s domains of engagement with Schedule VII

Company’s domains of engagement	Schedule VII listed domain
Eradicating hunger, poverty, and malnutrition,	(i) 1. Eradicating hunger, poverty, and malnutrition, 2[“promoting health care including preventive health care”] and sanitation 4[including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water
Promoting Healthcare	(i) 1. Eradicating hunger, poverty, and malnutrition, 2[“promoting health care including preventive health care”] and sanitation 4[including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water
Promoting Education	(ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
Special Education	(ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
Livelihood Enhancement	(ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
Empowering women and promoting health care	(ii) 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. (i) 1. Eradicating hunger, poverty, and malnutrition, 2[“promoting health care including preventive health care”] and sanitation 4[including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water
Empowering women and promoting gender equality	(ii) 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.
Maintaining quality of air	(iv) 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 4[including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga].
Animal Welfare	(iv) 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 4[including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga].
Environment Sustainability	(iv) 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 4[including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga].

Protection of national heritage, art, and culture	(v) 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 art and handicrafts;
Measures for the benefit of armed forces veterans	(vi) measures for the benefit of armed forces veterans, war widows and their dependents, 9[Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows];
Training to promote rural sports, nationally recognised sports,	(vii) training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports
Contribution to the Prime Minister's National Relief Fund	(viii) contribution to the prime minister's national relief fund 8[or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities, and women;
Contribution to incubators or research and development projects	(ix) a. Contribution to incubators or research and development projects in the field of science, technology, engineering, and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government;
Contributions to public funded Universities; Indian Institute of Technology (IITs), etc.	(ix) b. Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defence Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
Rural Development	(x) Rural Development Projects
Slum Area development	(xi) 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.]
Disaster Management	(xii) disaster management, including relief, rehabilitation, and reconstruction activities.

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Annexure – A

CAPCO TECHNOLOGIES PRIVATE LIMITED

ANNUAL ACTION PLAN FOR FY 2023-24

A. Objective:

We believe it is critical to engage with the social and ecological challenges that face humanity and that such engagement must be deep, meaningful and formed on the bedrock of long-term commitment, for that is the only way by which real change can happen on the ground. This is also reflective of the fact that such an approach serves both, enlightened business interest and social good. We run our social programs on a strong foundation of equitable principles, good governance and sound management and strive to be an ethical organization with deep social commitment and active ecological responsibility.

B. CSR Plan for FY 2023-24:

Pursuant to the requirement under Section 135 of the Companies Act, 2013 ("Act") and Rule 5(2) of Companies (Corporate Social Responsibility Policy) Rules, 2014, the Company is required to formulate an annual action plan on the proposed CSR projects, programs and activities for the financial year. In this regard, the Annual Action Plan for FY 2023-24 is provided below. The Company will carry out impact assessment of projects, wherever applicable, and will provide details of the same as part of its future reports as required pursuant to rule 8(3) of the Companies (Corporate Social Responsibility Policy) Rules, 2014

Name of CSR Project/Programs	Item from the list of activities in Schedule VII to the Act	Proposed Amount ₹ in Lakhs	Manner of execution of CSR Projects or Programs	Modalities of utilization of funds and implementation schedule for the project	Monitoring and Reporting Mechanisms
DEAF ENABLED FOUNDATION (DEF)	(ii) Promoting Education	7,64,800	Funding	Upgrade Ahmedabad center to facilitate training and coaching for 100 DEAF unemployed between age group of 18-35 years benefitting from the intervention. The DEAF youth belonging to the most socially/financially backward sections of the community shall be targeted	Utilization certificate, status/completion report
Bharat Sevashram Sangh	(ii) Promoting Education	10,35,000	Funding	Computer Lab Setup for Swami Pranavananda Vidyamandir, Panjgrain - Jammu. The Vidyamandir has planned to set up 04 computer labs in the school premises, of which 01 computer lab will be funded by Capco along with 01 projector screen. The computer lab and projector screen will directly benefit the beneficiaries in developing their computer skills; learning various computer languages; stay updated with the latest technology and take up computers as a subject.	Utilization certificate, status/completion report

UMEED	(iv) Animal Welfare	8,75,863	Funding	Establish their own veterinary clinic and operating theater, is to enhance their capacity to provide comprehensive medical care and treatment for rescued and distressed animals	Utilization certificate, status/completion report
Banyan	(ii) Livelihood Enhancement	4,62,992	Funding	The objective is to facilitate access to localized and comprehensive mental health services, decrease personal and caregiving strain, promote self-reliance and socio-economic well-being, and promote community well-being and social cohesion.	Utilization certificate, status/completion report
Belgaum Diocesan Social Service Society (BDSSS)	(iv) Environment Sustainability	4,52,600	Funding	To empower the rural farming communities in 6 villages and 3 Panchayat of Alnavar (dist. Gadag) to take steps to adapt to and mitigate the effects of climate change through climate adaptive agriculture and alternative livelihood.	Utilization certificate, status/completion report
SAVALI	(ii) Special education	3,06,290	Funding	Support Mentally Challenged and Cerebral Palsy children / adults with residential, office and educational facilities	Utilization certificate, status/completion report
DHRISTHI	(ii) Special Education	5,01,000	Funding	Procurement of musical instruments and enhance storage facilities in hostel for visually impaired girl students	Utilization certificate, status/completion report
Environment Association of Bangalore (EAB)	(iv) maintaining quality of air	9,79,400	Funding	Sponsoring Air Filters to improve air quality in highly polluted signals	Utilization certificate, status/completion report
Vanavasi Kalyana Karnataka	(i) promoting healthcare	6,77,688	Funding	Procurement of Medicines to Health clinics for Tribals / Vanavasi's	Utilization certificate, status/completion report
Bala Samskara Kendra	(ii) Promoting Education	5,96,300	Funding	Educational support to underprivileged children	Utilization certificate, status/completion report
Snehalaya	(i) promoting healthcare	1,95,420	Funding	Procurement of Ophthalmic instruments to aid HIV patients	Utilization certificate, status/completion report
Hasirudala	(iii) empowering women and (i) promoting health care	5,00,000	Funding	Support Zero Sanitary Waste Management - Menstrual hygiene with alternate sustainable products	Utilization certificate, status/completion report
Be and Make	(iii) empowering women and (i) promoting health care	5,04,300	Funding	Project Maryada (for 3000 students) – Sanitary hygiene kit for rural School students	Utilization certificate, status/completion report
Karnataka Mahila Yakshagana	(v) protection of national heritage, art and culture	5,46,200	Funding	Provide Costumes, Ornaments & PA systems to folk art troupe which will greatly assist the troupe in enacting new plays (Prasangas) as most of the current costumes are subjected to wear and tear	Utilization certificate, status/completion report

				as a result of frequent travel for performances.	
Victory Sports Foundation	(vii) training to promote rural sports, nationally recognised sports,	7,82,050	Funding	Funding Sports Equipment for 325 Children to enable Indian youth to make a significant Impact World Sports and to ensure organized sport is no longer a Luxury.	Utilization certificate, status/completion report
Indian Association for the Blind	(ii) Special Education	5,00,000	Funding	Funding for Assistive Devices (Braille items) for 50 Beneficiaries aiming to provide technology aided quality higher secondary education with residential facilities for the visually challenged children from low social economic groups	Utilization certificate, status/completion report
Public Charitable Anugraha trust Bagalkot	(ii) Livelihood Enhancement	4,60,000	Funding	Provide Livelihood enhancement by development of the children with mental retardation and people affected with Leprosy especially women and children through funding for Capacity building Activities	Utilization certificate, status/completion report
Outreach	(iv) Environment Sustainability	10,61,089	Funding	Promote Social Forestry as an Intervention for 1. Social forestry linked to livelihood on a sustainable basis, 2. Special focus on Horticulture, 3. Agro-Forestry	Utilization certificate, status/completion report
Sahodari Foundation	(iii) empowering women and promoting gender equality	10,61,089	Funding	Support underprivileged Transgender in the field of catering and clothing business	Utilization certificate, status/completion report
OSSAT	(ii) promoting education	6,27,519	Funding	Providing interactive learning tabs to Rural kids to empower in integrated digital learning bringing the most advanced teaching methods.	Utilization certificate, status/completion report
Taare Zameen Par	(i)Eradicating hunger, poverty and malnutrition,	3,10,400	Funding	Provide at least one time meal for one kid, which will include essential food item such as fortified cereals, protein-rich foods, vitamins, and food kit.	Utilization certificate, status/completion report