



Corporate Social Responsibility Policy

PURPOSE

The purpose of this document is to outline the Corporate Social Responsibility (“CSR”) policies and procedures for Sasken Technologies Limited (referred to as “Sasken” or “the Company”).

This Policy has been prepared pursuant to Section 135, the Companies (Corporate Social Responsibility Policy) Rules, 2014 (“Rules”) and Schedule VII of the Companies Act, 2013 (the “Act”) as amended.

OBJECTIVES

Aligning with *vision* of the Company, SASKEN through its CSR initiatives will continue to enhance value creation in the society and in the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth of the society and community, in fulfilment of its role as a *Socially Responsible Corporate*, with environmental concern.

We have established Sasken Foundation in January’ 2017 exclusively for undertaking CSR activities aimed at providing a dedicated approach to community development and also to fulfil our CSR commitments.

APPROACH

In accordance with the requirements under the Act and Rules thereto, Company’s CSR activities will focus on the areas defined under Schedule VII, as amended from time to time and will be subject to approval of the Committee of the Board / Board of Directors, as the case may be and may include the following broad categories:

HUNGER, POVERTY, MALNUTRITION AND HEALTH: Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.

EDUCATION: Promoting education, especially the underprivileged ones by providing scholarships, including special education and employment-enhancing vocational skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects, with the objective of assisting students in their studies.

RURAL DEVELOPMENT PROJECTS: Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power, improving the infrastructure of educational institutions and livelihoods, thereby creating sustainable villages.

GENDER EQUALITY AND EMPOWERMENT OF WOMEN: Promoting gender equality and empowering women; setting up homes, hostels and day care centers for women and orphans; setting up old age homes and such other facilities for senior citizens; digital enablement for financial inclusion and adopting measures for reducing inequalities faced by socially and economically backward groups and empowerment of women.

ENVIRONMENTAL SUSTAINABILITY: Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water.





NATIONAL HERITAGE, ART AND CULTURE: Protecting national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promoting and developing traditional arts and handicrafts.

IMPLEMENTATION

The CSR Committee will determine the quantum of expenditure on each of the activities / projects based on the necessity and / or size of the activity / program and in line with the Annual Action Plan, as approved by the Board. The Committee can delegate the same to the Chairman / work group to take it forward for speedy implementation.

Company will also undertake its CSR activities as approved by the CSR Committee, through the Sasken Foundation or such other entity / organization as approved by the CSR Committee.

GOVERNANCE STRUCTURE AND APPROACH

Board of Directors

In line with the provisions of Section 135 of the Act, Board of Directors of the Company will be responsible for the following:

- Constitute / re-constitute a CSR Committee and approve the CSR Policy;
- Make sure the Company spends, in every financial year, at least 2% of its average net profit during the three preceding financial years computed in lines with provisions of the Act and rules thereto and, in pursuance of this Policy;
- Approve the CSR Annual Action Plan and budget as proposed by the CSR Committee in accordance with Schedule VII of the Companies Act, 2013;
- Make disclosures in the Board report as per provisions of Section 134 including particulars specified in Annexures to the CSR rules. If the company fails to spend the amount, reasons for not spending to be specified in the said report.

CSR Committee

Roles and powers of the CSR committee will be as under:

- Formulate CSR Policy, Annual Action Plan and seek approval from the Board of Directors of the Company.
- Spend the allocated amount on CSR activities once approved by the Board of Directors and create a transparent monitoring mechanism of CSR initiatives.
- To monitor the end usage of CSR Funds, as approved by the Board, and in line with this Policy.
- To directly or indirectly take up programs that benefit the communities in & around its work centers and over a period of time, in enhancing the quality of life & economic wellbeing of the local populace.
- To generate, through its CSR initiatives, a community goodwill for Sasken and help reinforce a positive & socially responsible image of Sasken as a corporate entity.

MONITORING AND FEEDBACK

To ensure effective implementation of the CSR programs undertaken at each work center, a monitoring mechanism will be put in place by the work center head. The progress of CSR programs under implementation at work center will be reported to corporate office on a monthly basis.





The Secretarial team at the corporate office may conduct *impact studies* on a periodic basis, through independent professional / third parties / professional institutions, if required, especially on the strategic and high value programs.

Work centers will also try to obtain feedback from beneficiaries about the programs.

Chief Financial Officer or the person responsible for financial management of the Company shall certify to the Board that the CSR funds so disbursed have been utilized for the purposes and in the manner and in accordance with the Annual Action Plan as approved by the Board.

DISCLOSURE ON WEBSITE

Composition of CSR Committee, CSR Policy, Annual CSR activities / projects as approved by the Board, and other regulatory disclosures will be made available on the website of the Company.

SCOPE AND AMENDMENT TO THE POLICY

In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the Committee. In all such matters, the interpretation & decision of the Committee shall be final & binding.

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

The Company reserves the right to modify, cancel, add, or amend any part of this Policy document.

DEFINITION OF TERMS

Term / Abbreviation	Definition / Expansion
CSR	Corporate Social Responsibility
MCA	Ministry of Corporate Affairs
Act	Companies Act, 2013
Board	Board of Directors of the Company / Sasken
Committee	CSR Committee of the Board

APPROVED BY

Board of Directors of the Company

