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CORPORATE SOCIAL RESPONSIBILITY

POLICY OF SAKSOFT LIMITED

HISTORY OF AMENDMENT

S.no	Version no.	Prepared by	Approved by	Date of Approval / Amendment	Reason for new review
1.	1	Compliance Officer	Board of Directors	26th September, 2014	Adoption of the Policy
2.	1.1	Compliance Officer	Board of Directors	30th October, 2015	Due to reconstitution of the CSR Committee
3.	1.2	Compliance Officer	Board of Directors	27th May, 2020	Due to reconstitution of the CSR Committee
4.	1.3	Compliance Officer	Board of Directors	27th May, 2024	Regulatory requirements
5.	1.4	Compliance Officer	Board of Directors	04th November, 2026	Regulatory requirements

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CSR POLICY

INTRODUCTION AND BACKGROUND

Saksoft Limited (hereinafter referred to as "SAKSOFT" or "the Company") is a leading provider of Information Management solutions to successful organizations around the world. From strategic consultancy and the delivery of niche technical services, to a complete Information Management solution, Saksoft offers end-to-end solutions, together with support and training. Saksoft Limited has been a socially responsible company in the past and continues to be as it takes initiatives year on year to conduct social activities that benefit the socially & economically disadvantaged communities.

With the introduction of Companies (Corporate Social Responsibility Policy) Rules, 2014 on 27th February 2014, Saksoft is committed to establish the CSR committee and formulate a CSR policy.

At Saksoft, we take great pride in actively fostering the advancement of the communities in which we are embedded. Genuine inclusive development is realized when underprivileged communities and women, are empowered with knowledge, a conducive environment, and the essential skills to compete and contribute significantly to nation-building. Saksoft's initiatives are steadfastly directed towards enhancing the lives of these individuals, extending a sustained helping hand to improve their livelihoods and promote women's empowerment.

CSR VISION STATEMENT

In alignment with the Company's Vision, Saksoft through its CSR initiatives strives to create value by addressing critical social, environmental and economic needs of the society by which to promote sustained growth for society in fulfilment of its role as a Socially Responsible Corporate.

POLICY OBJECTIVES

The objectives of this policy are to –

- Develop meaningful and effective strategies for engaging with all stakeholders
- Make sustainable contributions to Communities
- Identify socio-economic opportunities to perform CSR activities
- Focus on social welfare activities as envisaged in Schedule VII of Companies Act, 2013.
- Partner with credible organizations focused on social welfare activities

SCOPE OF THE POLICY

- This Policy will focus on constitution of CSR Committee, roles and responsibilities of CSR Committee, CSR activities to be undertaken and allocation of funds for carrying out such CSR activities, Implementation and monitoring the execution of CSR activities for the Company.
- The policy shall apply to all CSR projects/Programmes undertaken by the Company in India as per

schedule VII of the Act.

- This Policy shall be applicable to SAKSOFT and all its employees. Subsidiaries of SAKSOFT to which Section 135 of the Act applies may adopt this Policy with such modifications as their respective Boards may approve.

CSR COMMITTEE

I. Composition: The CSR Committee of Saksoft shall comprise three or more directors, of which at least one director shall be an Independent Director, in accordance with Section 135(1) of the Act. The current composition of the CSR Committee is, as disclosed in https://www.saksoft.com/board-of-committee/

II. The CSR committee of Saksoft Limited will be responsible for:

- Formulating the CSR policy in compliance to Section 135 of the Companies Act 2013.
- Identifying activities to be undertaken as per Schedule VII of the Companies Act 2013.
- Recommending to Board the CSR expenditure to be incurred.
- Formulating and recommending to the Board an Annual Action Plan in pursuance of this Policy, in accordance with Section 135(3)(a) of the Act read with Rule 5(2) of the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("CSR Rules"), including the list of projects, manner of execution, modalities of utilisation of funds, monitoring and reporting mechanism, and details of need and impact assessment, if any.
- Recommending to Board, modifications to the CSR policy as and when required.
- Regularly monitoring the implementation of the CSR policy.

CSR BUDGET

CSR Committee will recommend every year as per Section 135(3)(b) of the Companies Act, 2013, the annual budgeted expenditure project wise to the Board of Directors for its consideration and approval.

CSR ACTIVITIES

The CSR Committee shall recommend to the Board of SAKSOFT to implement its CSR activities covering any of the areas as detailed below in accordance with Schedule VII of Companies Act, 2013 and amendments thereof :-

(i) eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;

(ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;

(iii) 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;

(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 including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of

river Ganga;
(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 arts and handicrafts;
(vi) measure for the benefit of armed force veterans, war widows and their dependents,Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
(vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sports;
(viii) contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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;
(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; and
(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).
(x) rural development projects.
(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.
(xii) disaster management, including relief, rehabilitation and reconstruction activities.
(xiii) Subscription to zero coupon zero principal instruments on Social Stock Exchange, subject to the conditions specified in Rule 4A of the CSR Rules.
Activities not considered as CSR: In terms of Rule 2(1)(d) of the CSR Rules, the following shall not be considered as CSR activities: (i) activities undertaken in pursuance of the normal course of business of the Company; (ii) activities undertaken outside India, except training of Indian sports personnel representing any State or Union Territory at the national level or India at the international level; (iii) contribution of any amount, directly or indirectly, to any political party under Section 182 of the Act; (iv) activities benefitting employees of the Company; (v) activities supported on a sponsorship basis for deriving marketing benefits for products or services; and (vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India.

IMPLEMENTATION

The Board of Saksoft shall based on the recommendations from the CSR Committee shall implement any of the activities as mentioned under schedule VII of the Companies Act, 2013 through any of the following ways:_

- Registered Trust or Society or Company established by the Company.
- Any other established Registered Trust or Society having track record of three years in undertaking similar programs or projects.
- Collaborate with other Companies for undertaking projects or programs or CSR activities.
- Every implementing agency, other than the Company itself, shall be registered with the Central Government by filing Form CSR-1 and shall satisfy the eligibility conditions prescribed under Rule 4(1) of the CSR Rules, including registration under section 12A and approval under section 80G of the Income-tax Act, 1961 (or the corresponding provisions of the Income-tax Act, 2025), wherever applicable. The Company may also engage international organisations for designing, monitoring and evaluation of CSR projects, as permitted under Rule 4(4) of the CSR Rules.

BOARD RESPONSIBILITIES ON CSR: -

The Board of Saksoft will be responsible for:

- Approving the CSR policy as formulated by the CSR Committee
- Ensuring that in each financial year the Company spends at least two per cent 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 and Rule 2(1)(h) of the CSR Rules (excluding profits arising from overseas branches and dividends received from other companies in India covered under and complying with Section 135).
- Ensuring that every financial year funds committed by the Company for CSR activities are utilized effectively and regularly monitoring implementation.
- Disclosing of contents of Corporate Social Responsibility policy in the Board's report and on the Company's website, as per annexure attached to the Companies (Corporate Social Responsibility Policy) Rules, 2014.
- Ensuring annual reporting of CSR policy to the Ministry of Corporate Affairs, Government of India, in Form CSR-2, as per the prescribed format.
- Satisfying itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it, with the Chief Financial Officer certifying to that effect, as required under Rule 4(5) of the CSR Rules.

Any unspent CSR amount, other than that relating to an ongoing project, shall be transferred to a Fund specified in Schedule VII within six months of the expiry of the financial year. Any amount remaining unspent pursuant to an ongoing project shall be transferred, within thirty days from the end of the financial year, to the 'Unspent Corporate Social Responsibility Account' and spent within three financial years, failing which it shall be transferred to a Fund specified in Schedule VII, in accordance with Section 135(5) and 135(6) of the Act. The reasons for not spending shall be specified in the Board's Report. Any surplus arising out of CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same project, or transferred to the Unspent CSR Account, or to a Fund specified in Schedule VII within six months of the expiry of the financial year, as per Rule 7(2) of the CSR Rules. Excess amount spent, if any, may be set off against the CSR obligation of up to three immediately succeeding financial years, as per Rule 7(3).

FRAMEWORK ON MONITORING AND REPORTING

Saksoft's CSR Committee shall monitor the implementation of the CSR Policy through periodic reviews. The heads of Saksoft will present list of programmes, projects, and activities to the CSR Committee for its approval. The Committee will in turn recommend this to the Board for its final approval. In compliance with the Act and to ensure funds spent on CSR programmes are creating the desired impact on the ground, a comprehensive Monitoring and Reporting framework will be put in place. The monitoring and reporting mechanism is divided into three distinct areas:

I. Programme Monitoring:

II. Evaluation:

III. Reporting and Documentation:

Programme Monitoring:

I. Programme monitoring mechanism will ensure:

- The CSR policy is implemented as per the Act and the Rules.
- The CSR policy is implemented ensuring that all projects/programmes as budgeted are duly carried out

II. CSR spends will be closely monitored and funds shall be released against verified utilizations as per the approved work plans.

III. CSR spends will be audited in an accountable and transparent manner.

IV. Periodic review by the CSR committee and the Board.

Evaluation:

I. An MIS monitoring mechanism will be put in place.

II. There shall be clarity about the scope of the programme and the need before evaluations are undertaken.

Documentation and Reporting:

The CSR Committee will prepare the annual CSR report to be filed by the Company on approval of the Board. This report will ensure:

a. CSR projects and programmes are being properly documented.

b. The Accountability is fixed at each level of CSR process and implementation.

c. **Impact Assessment:** Where the average CSR obligation of the Company in the three immediately preceding financial years is ten crore rupees or more, the Company shall undertake impact assessment, through an

independent agency, of its CSR projects having outlays of one crore rupees or more and which have been completed not less than one year before undertaking the impact study, in accordance with Rule 8(3) of the CSR Rules.

CONCLUSION

This Policy will form the framework for functioning of the CSR activities of the Company. Our Board of Directors, our Management and all of our employees subscribe to this policy with compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

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