

GENIE INFOTECH PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILTY (CSR) POLICY

CONTEXT

In **GENIE INFOTECH PRIVATE LIMITED**, Corporate Social Responsibility is focused on enhancing the lives of the local community in which it operates by **Promoting education, including special education and employment-enhancing vocational skills, especially among children, women, the elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies, this also includes skilling and reskilling initiatives for those who are in need. And protecting national heritage, art, and culture, including the restoration of buildings, sites of historical importance, and works of art; setting up public libraries; reviving, promoting, and developing traditional arts and handicrafts.** We strongly believe in contributing towards the betterment of society and endeavor to create a positive impact, while achieving our business goals. We understand that that the profitable growth of our company depends on the economic, environmental, and social sustainability of our communities. And we know it is in our best interests to contribute to the sustainability of those communities.

As good corporate governance we have contributed for promoting education and protecting national heritage, art, and culture through trust/entities registered and approved for undertaking CSR Activities.

Institute/Entity	PAN	Activities	Amount
Bhandarkar Oriental Research Institute Address: 812, Law College Road, Shivaji Nagar, Pune, MH25, MH, PIN 411004. (CSR Registration No: CSR00023405)	AAATB8360L	Promoting Art & Culture.	Rs.2,00,000/-
The Poona Gujrati Kelvani Mandal, Address: Prof. J P Trivedi Vidya bhavan, 1433 Kasba Peth, Pune. MH 25, PIN 411001. (CSR Registration No: CSR00006569)	AAATT6313P	Promoting Education	Rs.4,75,500/-

Further, pursuant to Section 135 of the Companies Act 2013, and Companies (Corporate Social Responsibility Policy) Rules 2014 every Company having net worth of Rs.500 Crores or more or turnover of Rs.1,000 Crores or more or net profit of Rs.5 Crores or more during any financial year shall constitute Corporate Social Responsibility Committee ('CSR Committee'), However where the amount to be spent for CSR activities does not exceed Rs 50 lakhs, there is no requirement for constitution of CSR Committee , functions of such committee can be done by board of director of the company.

Accordingly, company has decided not to form committee since the amount to be spent for CSR activities does not exceed Rs. 50 lakhs and amount eligible for spending for CSR activities was spent via 2 entities/trust details of which given above.

This Policy on Corporate Social Responsibility (CSR Policy) has been formulated by and recommended by the Board of Directors of the Company ('Board') and same has been approved. The Board at its meeting held on 10th March 2022 approved and adopted the CSR Policy with immediate effect.

The Companies Act, 2013 further provides that the Board of every company referred to into which Section 135(1) applies, shall ensure that the company spends, in every financial year, at least two percent, of the average net profits of the company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.

Provided further that if the company fails to spend such amount, the Board shall, in its report made under clause (o) of the sub- section (3) of the section 134, specify the reasons for not spending the amount.

OBJECTIVES OF THE POLICY

This Policy shall be read in line with Section 135 of the Companies Act 2013, Companies (Corporate Social Responsibility Policy) Rules, 2014 and such other rules, regulations, circulars,

and notifications (collectively referred hereinafter as 'Regulations') as may be applicable and as amended/notified from time to time and will, inter-alia, provide for the following:

- Establishing a guideline for compliance with the provisions of the Regulations to dedicate a percentage of Company's profits for CSR activities.
- Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.
- Creating opportunities for employees to participate in socially responsible initiatives, such as promoting Education and Art, Culture etc.

DEFINITIONS

In this Policy unless the context otherwise requires: -

- 'Act' means Companies Act, 2013;
- 'Corporate Social Responsibility' means Corporate Social Responsibility (CSR) as defined in Section 135 of the Companies Act 2013 and Companies Corporate Social Responsibility Policy) Rules 2014;
- 'Ministry' means the Ministry of Corporate Affairs
- 'Net Profit' means net profit as defined in Section 135 of the Companies Act 2013 and Companies Corporate Social Responsibility Policy) Rules 2014 as set out below:

Net Profit as per financial statements prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:

- a) any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
- b) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act
- c) Words and expressions used in this CSR Policy and not defined herein but defined in the Act shall have the meaning respectively assigned to them in the Act.

CSR ACTIVITIES

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged by one or more of the following focus areas as notified under Schedule VII of Section 135 of the Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014:

Sr. No.	Activities
1.	Eradication of extreme poverty and hunger and malnutrition, promoting preventive health care and sanitation including contribution to the Swach Bharat Kosh set up by the Central Government for the promotion of sanitation and making available safe drinking water .
2.	Promotion of education including special education and Employment enhancing vocation skill especially among children, women, elderly, and differently, abled and livelihood enhancement projects
3	Promote Gender equality and woman empowerment, setting up homes and hostels, for women and orphans, setting up old age homes, day care Centre, and such other facilities for senior citizens, measures for reducing inequalities faced by socially and economically backward group
4.	Ensuring Environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation natural resources, and maintaining quality of soil, air, and water including contribution to the clean Ganga Fund set up by the central Government for rejuvenation of river ganga
5.	Protection of national heritage, art and culture including restoration of building, and sites of historical importance, and works of arts, setting up of public libraries, promotion, development of traditional arts and handicrafts.
6.	Measure for the benefit of armed forces veteran, war widows and their dependents
7.	Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports
8.	Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Govt.
9.	Contribution to Prime minister relief fund and such other state and central fund for Socio economic development, and relief and welfare of the scheduled castes, the schedule tribes, other backward classes, minorities and women

CSR activities shall be undertaken as projects, programs or activities (either new or ongoing) excluding activities undertaken in pursuance of the normal course of business of the Company.

FOCUSED AREA FOR CSR

The Act provides that the Company shall give preference to the local area and areas around where it operates, for spending the amount earmarked for Corporate Social Responsibility. However, the Board of Director may identify such areas other than stated above, as it may deem fit, and recommend it to the Board for undertaking CSR activities.

CSR BUDGET

The Board of Director will recommend the annual budgeted expenditure. The Company would endeavor to spend not less than 2% of the average Net Profits of the Company made during the three immediately preceding financial years. The amount would be calculated as per the Regulations. The same may amended annually according to financial year after review by The Board of Director or at such time, as the Board may deem fit. The Board of Directors of the Company may increase or decrease contribution at any time at its discretion but not less than above percentage as per Companies Act 2013.

COMPOSITION OF CSR

Being a Private Limited company, the Corporate Social Responsibility shall consist of two members as detailed below and of which one will act as Chairperson of the CRS:

Sr. No.	Name of the Members	Designation
1.	Mr. Suketu Shah	Director & Chairperson
2.	Mr. Amol Phansalkar	Director

Members are liable to change as per decision of the Board of Directors.

The Board of Director shall meet at least **2 times** in each year to discuss the activities to be carried out in the financial year and to review the implementation of the object under the policy along with its effectiveness.

ROLE AND FUNCTIONS OF CSR BY BOARD OF DIRECTOR

The Board of Director 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.
- To carry out such other activities as deemed appropriate by the Board of Directors of the Company and/or as deemed appropriate and expedient by the Board of Directors for the furtherance of CSR objectives of the Company, in pursuance with the Regulations.

COMPLIANCE, MONITORING AND REPORTING

The Board of Director shall prepare a transparent monitoring mechanism for ensuring implementation of activities to be undertaken by the company. Compliance with this policy will be continuously monitored and subject to review by the Board.

The Board of Director will review activities of the Company and will provide progress and update to the Board of Directors as and when required. The Company will report in the prescribed format details of the CSR initiative to stakeholders as required under the regulations.

AMENDMENTS TO THE POLICY

The Board of Directors on its own can amend this Policy, as and when required as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Regulations on the subject as may be issued from relevant statutory authorities, from time to time.

- This policy is subject to continuous review and updates from time to time.