

CORPORATE SOCIAL RESPONSIBILITY
POLICY
OF
SHHIVTEK INDUSTRIES PRIVATE LIMITED

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1. INTRODUCTION

Shhivtek Industries Private Limited (“the Company”) was incorporated under the provision of the Companies Act, 1956 on 23rd March, 2009. Shhivtek Industries Private Limited CSR Policy believes in integrating its business values and operations to meet the expectations of its stakeholders and the society at large. The Company believes that long-term sustainability can be achieved by meeting legitimate concerns of all stakeholders. The Company’s approach to sustainable development focuses on the triple bottom line of Economic, Environmental and Social performance.

This Policy shall be called “Corporate Social Responsibility Policy” or “CSR Policy”, which is framed in accordance with the provisions of Section 135 of the Companies Act, 2013 (“the Act”) read with Companies (Corporate Social Responsibility Policy) Rules, 2014 (“CSR Rules”).

This Policy outlines the Company’s philosophy and responsibility and lays down the guidelines and mechanism for undertaking socially useful programmes towards welfare & sustainable development of the community around the area of operations of the Company and other parts of the Country.

2. OBJECTIVES

Shhivtek Industries’ CSR Policy intends to:

- Strive for economic development that positively impacts society at large with minimal resource footprint.
- Embrace responsibility for the Company’s actions and encourage a positive impact through its activities to alleviate hunger, poverty and malnutrition; to protect the environment; and to support communities, stakeholders and society.

3. FOCUS AREAS

In accordance with the requirements under the Companies Act, 2013 and the rules / regulations framed there under and circulars / clarifications issued thereunder (collectively, “Applicable Law”), Shhivtek Industries’ CSR activities, amongst others, will focus on:

- 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, 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.
- RURAL DEVELOPMENT PROJECTS: Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power 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 centres for women and orphans; setting up old age homes and other similar facilities for senior citizens; and adopting measures for reducing inequalities faced by socially and economically backward groups.
- 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 the restoration of buildings, sites of historical importance, and works of art; setting up public libraries; reviving, promoting and developing traditional arts and handicrafts.
- CONTRIBUTION: To the Prime Minister National Relief 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;

4. BUDGET

- a) The Board of Shhivtek Industries Private Limited shall Endeavour that minimum 2% of average net profit of the Company for immediately preceding three financial years (“CSR Expenditure”) is spent on CSR initiatives undertaken by company.
- b) All expenditure towards the programs to be diligently documented.

5. MODE OF IMPLEMENTATION

The CSR Committee may identify location wise projects and appoint any registered trust or Section 8 Company or society as Agency to implement the various CSR projects or CSR programs. The Company shall provide funds to CSR Committee/ Agency appointed by CSR Committee on requirement basis. The funds will be utilized by Agency/ this committee for such projects or programmes as may be approved by CSR committee. The Board with support of the CSR Committee will maintain records for each project at each location and ensure to provide the details of expenditure / reports for each project

undertaken under this CSR Policy, in a manner as may be desired by the Company, from time to time.

The allocated CSR budget / corpus will be utilized for CSR activities to be undertaken within India:

- (i) Which shall not be exclusively for the benefit of employees of the Company or their family members.
- (ii) Which are not in pursuance of normal course of business of the Company.

The Board of Directors (“the Board”) has delegated necessary powers and authorities to the CSR Committee for execution and implementation of the CSR Policy of the Company. The CSR Committee shall always adhere to the duties including but not limited to the following—

- a) Formulate, recommend and time to time update to the Board a CSR Policy.
- b) Recommend the amount of expenditure to be incurred on the activities under this CSR Policy.
- c) Monitor the CSR Policy of the Company from time to time.
- d) To perform such associated activities as may be delegated by the Board.

6. UNDERTAKING CSR ACTIVITIES

Shhivtek Industries’ will undertake its CSR activities (being projects / programs / other permitted activities), approved by the CSR Committee either directly or through the Infosys Foundation and / or such other eligible entity / organization as approved by the CSR Committee.

The surplus arising out of the CSR activities shall not form part of the business profit of the Company. Such surplus shall be spent towards its CSR activities in accordance with this policy.

Identification and implementation of multi-year CSR projects / programs (“Ongoing Projects”) will be monitored by the CSR Committee and the Board of Directors of the Company (“the Board”), as required under Applicable Law.

7. CSR ANNUAL ACTION PLAN AND LOCATION OF CSR EFFORTS

The CSR Committee shall decide on the locations for CSR activities and formulate and recommend to the Board for approval a CSR annual action plan, which shall contain all matters which are required under Applicable Law and any other matters as the CSR Committee may deem fit from time to time. The Board may modify the annual action plan as per the recommendations of the CSR Committee at any time during the financial year, based on reasonable justification.

8. IMPACT ASSESSMENT

Impact assessment shall be undertaken by the Company or by recipient or by implementing agency as required by and in the manner set out under Applicable Law, and the impact assessment report(s) shall be placed before the CSR Committee and the Board, and shall be disclosed as legally required.

9. COMPOSITION OF CSR COMMITTEE AND DISCLOSURES

The CSR Committee shall be comprised in accordance with the requirements of Applicable Law. This CSR Policy, details of the composition of the CSR Committee and projects approved by the Board shall be hosted on the Company's website at www.shiva-group.com.

10. GOVERNANCE

The Company can undertake CSR activities either by itself or through other entities eligible to undertake CSR activities under Applicable Law. Accordingly, entity will work closely with and support the Board and the CSR Committee in carrying out the CSR activities of the Company. Entity will assist the CSR Committee in identifying the areas of CSR activities and execution of initiatives as per defined guidelines. Entity will also assist the Board and the CSR Committee in reporting the progress of deployed initiatives and in making appropriate disclosures (internal / external) on a periodic basis.

11. FUNDING, SELECTION AND MONITORING PROCESS

Entity will receive requests for funding of projects throughout the Financial year. Its panel of experts will evaluate proposals received under the entity's focus areas and projects will be prioritized by assessing their potential impact. The Entity will then forward its recommendations to the CSR Committee.

The CSR Committee will deliberate on the proposals and approve proposals for implementation at its discretion. The entity will collaborate with stakeholders to monitor the status of each project and will report its findings to the CSR Committee periodically to enable the Board and the Management of the Company to meet their reporting, monitoring and other legal obligations.

In any year, where the Company has spent in excess of its CSR obligation, such excess spending shall be available for set off against the Company's CSR obligations for up to the next three financial years in accordance with Applicable Law, and the Board shall be competent to pass a resolution in this regard.

12. AMENDMENTS TO THIS POLICY

The Board of Directors on the recommendation of the CSR committee can amend its policy as and when required deemed fit. Any or all provisions of CSR

Policy would be subjected to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.