

CORPORATE SOCIAL RESPONSIBILITY POLICY OF STEFANINI INDIA PRIVATE LIMITED

(With effect from November 25, 2019)

In accordance with Section 135 of the Companies Act 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014("the Act")

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1. Context

At Stefanini India Private Limited (hereinafter referred as "Stefanini"), business success is not just about profits. Stefanini believe in pursuing wider socio-economic and cultural objectives and have always endeavored to not just live up to it, but to try and exceed the expectations of the communities in which we operate.

Quality education is the most powerful tool for socio-economic transformation of a country. It not only eradicates poverty but also ensures equity among people. Therefore, Stefanini's CSR and welfare activities will be committed to create and support programs that bring about sustainable changes through education and use of technology.

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2. Main/Focus areas

Stefanini's CSR and welfare activities will center on the areas as per Annexure-A.

However, the Company may, subject to the approval of the CSR Committee, undertake any CSR project specified in Schedule VII of the Companies Act, 2013 amended from time to time.

3. Composition of CSR Committee

The Board of Directors of the Company shall constitute / re-constitute the CSR Committee from time to time in compliance with statutory requirements. The CSR Committee shall comprise of a minimum of two directors

The CSR Committee may invite members of senior management and other persons as it deems necessary to the committee meetings.

4. Undertaking CSR Activities

Stefanini will primarily support the CSR activities, permitted under the Companies Act, 2013 and rules made there under. However, if required, it may also undertake CSR activities through any other entity / organization in compliance with the provisions of applicable laws.

5. Selection and Implementation of CSR Activities and Projects

The CSR Committee shall consider CSR proposals by its members or through any other eligible entity. In order to be considered by the CSR Committee, such proposals must inter-alia contain details of projects / programs to be undertaken, proposed amount, timelines and a confirmation that such projects / programs are eligible under the Companies Act, 2013 and rules made there under.

The CSR Committee will evaluate the projects / programs and may, at its sole discretion, approve certain projects / programs for implementation. While approving projects / programs, the Committee shall ensure that those are covered under the ambit of activities listed in Clause 2 above.

6. CSR Budget/Expenditure

The Board shall approve overall limits for CSR Activities to be undertaken by the Company. Within the overall limits approved by the Board, the CSR Committee shall approve individual projects / programs. Any surplus arising out of the CSR projects, programs or activities will not form part of the business profit of Stefanini.

7. Location

All CSR projects / programs under this policy shall be undertaken in India. The CSR Committee shall decide on locations for implementation of the CSR projects / programs.

8. Monitoring and Disclosure

The CSR Committee shall endeavor to:

Devise a robust monitoring mechanism to ensure that the CSR projects / programs are undertaken effectively in accordance with the approval granted and are fully in compliance with applicable laws, rules and regulations. Monitoring of CSR activities could be done through:

- Periodic third party assessment of key projects
- Impact assessment with key indicators in our areas of operations
- Regular review by CSR committee

Ensure that appropriate disclosures are made to the shareholders in the company's annual reports.

The Contents of the CSR Policy shall be disclosed in the Board's report and displayed at the Stefanini Website.

9. Validity of CSR Policy

This policy is effective from November 25, 2019 and may be amended by the Board as required from time to time.

10. Amendment

This Policy will be amended as per requirement/change of law by the CSR Committee.

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Annexure-A

List of Activities:

Schedule VII of the Companies Act 2013 Amendment

(l) In Schedule VII, for items (i) to (x) and the entries relating thereto, the following items and entries shall be substituted, namely:

1. Eradicating hunger, poverty and malnutrition, promoting 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.
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
3. 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;
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare agro forestry, conservation of 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 buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts:
6. Measures for the benefit of armed forces veterans, war widows and their dependents;
7. Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
8. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Caste\$, the Scheduled Tribes, other backward classes, minorities and women;
9. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of

Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), [Department of Biotechnology (DBT)], Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

10. Rural development projects.

11. Slum area development.

12. Disaster management, including relief, rehabilitation and reconstruction activities

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