

Vehant Technologies Pvt. Ltd.

Corporate Social Responsibility Policy

1. SCOPE AND OBJECTIVE OF THIS POLICY

This Policy shall be called the ‘Vehant Technologies Corporate Social Responsibility Policy’ (herein after referred to as “the CSR Policy”).

The CSR Policy lays down the guidelines for undertaking socially meaningful programmes for welfare and sustainable development of the community, especially in and around the areas of operations of the Company, and to provide assistance / relief to the people affected by natural disasters in any part of the Country..

The CSR Policy shall apply to all CSR activities or programmes undertaken by the Company in India.

2. CSR Vision Statement

To create sustainable environment by enabling the society to lead a better life and making the roads safer.

3. Purpose

The key purpose of this CSR policy is to:

- ❖ Define what CSR means to us and the suggested approach to achieve our goal of helping people live better lives.
- ❖ Define the kind of projects that Vehant wishes to undertake as part of its CSR initiatives and its execution modalities.
- ❖ Determine the estimated CSR spend.
- ❖ Lay down the implementation, monitoring and reporting framework.

4. Title and Applicability

The Policy lays down the principles and mechanisms for undertaking various programs in accordance with Section 135 of the Companies Act, 2013 (hereinafter referred to as “the Act”) on CSR and in accordance with the Companies (CSR Policy) Rules, 2014 (hereinafter referred to as “the Rules”) notified by the Ministry of Corporate Affairs, GOI on 27th February 2014 as amended from time to time and circulars and notifications issued thereunder.

The Policy shall apply to all the CSR programs and activities undertaken by Vehant directly or indirectly through any other company registered under section 8 of the Act / registered trust / society or any other organization as may be provided in the Act from time to time at various locations in India as per Schedule VII of the Act for the betterment of Indian community.

5. Implementation

The mode of implementation of CSR programs will include a combination of direct and indirect implementation through Vehant Technologies and /or working with partners such as Governments and / or Government bodies, Government schools and college, training institutes, NGOs, business partners, registered societies etc. Vehant will select its activity partners after appropriate due diligence.

Vehant may use the services of internal teams, expert agencies, consultancy firms etc., wherever required for carrying out base line surveys, guidance on project design and implementation, due diligence of implementation partners, impact assessment surveys etc.

6. Key focus areas of CSR Initiatives at Vehant (CSR Projects)

(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 set-up 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 art and handicrafts;

(vi) Measures for the benefit of armed forces veterans, war widows and their dependents;

(vii) Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports

(viii) Contribution to the prime minister's national relief fund or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;

(ix) 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 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).

(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) Any other area as may be specified or included in the Schedule VII of the Act from time to time.

7. Board Level CSR Committee

The CSR Committee constitutes of the following members of the Board:

1. Mr. Anoop G Prabhu
2. Mr. Prem Kumar Kalra
3. Mr. Amit Goyal
4. Mr. Kapil Bardeja

Mr. M. Balakrishnan- Invitee

The Board may change the composition of Committee from time to time but it shall consist of two or more directors of the Company

8. Responsibilities of CSR Committee

- ❖ To formulate and recommend the CSR Policy to the Board for approval
- ❖ To monitor the CSR Policy from time to time and recommend changes to the Board
- ❖ To recommend the amount of expenditure to be incurred on CSR projects
- ❖ To identify, segment and recommend the CSR projects/activities to be undertaken
- ❖ To ensure effective and efficient implementation of the CSR projects
- ❖ To create transparent monitoring mechanism for implementation of the CSR initiatives and provide guidance to the team, whenever required.
- ❖ To review the CSR initiatives and Programs / activities undertaken during the year

9. Monitoring and Reporting Framework

Vehant will institute a monitoring and evaluation mechanism to ensure that each CSR program has:

- ❖ Defined objectives developed out of the societal needs

- ❖ Defined targets, time lines and measurable parameters, wherever possible
- ❖ The Committee will periodically monitor the CSR spend programs and activities undertaken.
- ❖ Monitoring activities may include monthly field visits, comprehensive documentation, periodic reports from implementing agencies and regular interaction with beneficiary communities.
- ❖ The Board of Director will report CSR performance in its annual reports per structure and format prescribed in notified CSR rules.

10. Budget

In accordance with the Act and area specified in the CSR Policy, a specific budget shall be allocated for CSR initiatives. The CSR expenditure shall include all actual expenditures including contribution to corpus or on project or programs relating to CSR activities recommended by the CSR Committee but shall not include any expenditure that does not fall within the purview of Schedule VII of the Act.

11. Treatment of Surpluses

Any surplus generated from CSR projects undertaken by us will be tracked and channelized into our CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.