

WITZEAL TECHNOLOGIES PRIVATE LIMITED

Corporate Social Responsibility Policy

INTRODUCTION

This Corporate Social Responsibility (hereinafter referred to as 'CSR') Policy is adopted by the Board of Directors of M/s Witzeal Technologies Private Limited (hereinafter referred to as '**WITZEAL**' or '**the Company**') in terms of section 135 of the Companies Act, 2013 (hereinafter referred to as 'the Act') read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as 'the CSR Rules'), as amended from time to time.

CSR POLICY

It is **WITZEAL's** Policy to direct its CSR Programmes, inter alia, towards achieving one or more of the following:

- promoting education and skill development;
- promoting healthcare including preventive healthcare;
- providing sanitation and drinking water;
- ensuring environmental sustainability;
- enabling climate resilience;
- rural development projects;
- creating livelihoods for people, especially those from disadvantaged sections of society;
- promoting sports;
- contributing to or funding technology incubators which are approved by the Central Government of India; and
- providing relief and assistance to victims of disasters and calamities.

FOCUS AREAS

In accordance with the requirements under the Companies Act, 2013, **WITZEAL's** CSR activities, amongst others, will focus on:

- **EDUCATION:** Promoting education, including special education and employment-enhancing vocational skills especially among children, women, 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.

- **HUNGER, POVERTY, MALNUTRITION AND HEALTH:** Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.
- **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 such other facilities for senior citizens; and adopting measures for reducing inequalities faced by socially and economically backward groups OR disadvantaged sections of society
- **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.
- **FINANCIAL ASSISTANCE TO NGOs:** Providing financial assistance to reputed non-governmental organizations working in any of the above-mentioned areas.

Note: Aforesaid CSR projects may be updated from time by the Company.

IMPLEMENTATION

WITZEAL's CSR Programmes will be implemented through (i) Company personnel, or (ii) external implementing agencies (iii) Reputed NGOs and (iv) such other Trusts, Societies, Foundations and Section 8 companies that may be established by the Company from time to time.

In case CSR Programmes are implemented through external agencies, the programmes to be undertaken by those agencies or Trusts will be specified, and it will be ensured that such

programmes are covered in the Objects laid down in the respective Trust Deeds / Memorandum and Articles of Association of the external agencies.

The surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the Company.

LOCATION OF CSR ACTIVITIES

The CSR committee will decide on the locations for CSR activities from time to time, but CSR Programmes primarily implemented in areas that fall within the jurisdiction of the Company's Registered Office i.e., **Faizabad District of Uttar Pradesh.**

CSR COMMITTEE

The CSR Committee shall be comprised in accordance with the requirements of the Companies Act, 2013 and the Rules made thereunder. The details of the composition will be hosted on the Company's website at **www.XXXXXXX.com**. The CSR committee shall consist of the following directors:

- 1) Mr. Ankur Singh
- 2) Mr. Amit Singh

RESPONSIBILITIES OF THE CSR COMMITTEE

The responsibilities of the CSR Committee include:

- Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken,
- Recommending the amount of expenditure for the CSR activities, and
- Monitoring CSR activities from time to time.

MONITORING AND FUNDING PROCESS

The Company shall implement a monitoring mechanism over the Company's CSR projects under the direction of the CSR committee. Such monitoring mechanism among other things, make transparent the manner and details of the implementation of all mandatory CSR projects undertaken by the Company.

CSR EXPENDITURE

It will be the Company's endeavour to spend in every financial year, two percent of its average net profits during the three immediately preceding financial years (or such other limit as may be prescribed under the Act), on CSR Programmes in pursuance of this Policy.

The CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the CSR Plan.

Any surplus arising from the CSR Programmes will be used for CSR activities within six months from the end of the relevant financial year. Accordingly, any income arising from CSR Programmes will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.

If CSR expenditure in a financial year exceeds the statutory limit, such excess may be set-off against CSR expenditure for the next three financial years with the approval of the Board, on the recommendation of the CSR Committee.

Details of spending will be prepared in the below format:

| Activity | Amount allocated | Spent | | Unspent | Cumulative expenditure upto the reporting period | Excess revenue from activity | Balance in Corpus |
|-----------------|-------------------------|---------------|-----------------|----------------|---------------------------------------------------------|-------------------------------------|--------------------------|
| | | Direct | Overhead | | | | |
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REPORTING

As in compliance with the requirements of the Act, the board shall act on the principle of COREX i.e. comply or explain. Thus, it is duty of the board to ensure that compliance as per the policy has been made.

EFFECTIVE DATE

This policy is effective from May 10, 2021.

CONTACT INFORMATION

For queries related to the CSR Policy, please write to us at:

Xxxxxxxxxx

In the event of any inconsistency between this Policy and the applicable laws, the applicable laws will prevail.

This Policy will be reviewed by the Board, on the recommendation of the CSR Committee, as and when deemed necessary.

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