

CORPORATE SOCIAL RESPONSIBILITY POLICY

OF

NETSURF COMMUNICATIONS PRIVATE

LIMITED



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1. Objective

- To set policies for CSR activities in accordance with Section 135 of the Companies Act.
- To comply with the provisions of the Law as stated in Companies Act.

2. Commitment to Corporate Social Responsibility (CSR)

Netsurf Communications Private Limited, including all its executives and employees, recognizes CSR as a vital part of corporate activity is committed to a course of social responsibility in accordance with this CSR policy for the sustainable development of society.

3. Short title and Commencement:

The rules will be here in referred CSR Policy Rules.

Definitions:

I. CSR Committee:

- The CSR Committee shall comprise of two or more directors of the Company.
- The CSR Committee of the Company shall be responsible for:
 - a. Formulating and recommending to the Board the CSR Policy which shall indicate activities to be undertaken in line with Section 135 read with Schedule VII of the Act.
 - b. Recommending to the Board the CSR expenditure to be incurred.
 - c. Monitor the implementation of the CSR Policy from time to time

II. CSR Budget:

The amounts to be spent by the Company shall be as stipulated under the Act, as amended from time to time (presently 2% of the average net profits of the Company for the preceding three financial years) and as approved by the Board. Any surplus arising

out of the CSR projects or programs or activities shall not form part of business profits of the Company.



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III. CSR Activities:

Relates to the activities to be undertaken by the company as specified in Schedule VII of the Companies Act, 2013 and the expenditure thereon, excluding activities undertaken in pursuance of normal course of business of a company.

IV. CSR Expenditure:

CSR Expenditure shall include all expenditure including contribution to corpus, for projects or programs related to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act.

V. Surplus:

Any surplus arising out of CSR activities shall not be considered part of a company's business profit.

VI. Average net profit:

Average net profit shall be such as calculated in accordance with the provisions of section 198 of the Companies Act, 2013.

4. Scope:

The activities in scope for CSR will be governed by the guidelines mentioned in Schedule VII of the Companies Act, which is as under:

- i. eradicating hunger, poverty and malnutrition, (promoting health care including 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;



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SEHAT BARKAT MUSKURAHAT

- 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 centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economic backward groups;
- iv. 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 setup 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 arts and handicrafts;
- vi. Measures for the benefit of armed forces veterans, war widows and their dependents;
- vii. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sports;
- viii. 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 Castes, the Scheduled Tribes, other backward classes, minorities and women;
- ix. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- x. Rural development projects.
- xi. Slum area development (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.)



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- xii. Any other activity, if any, hereinafter approved by the Central Government from time to time.

5. Guidelines to be followed by way of granting financial assistance / donation / sponsorship:

- i. While sanctioning financial assistance / donation / sponsorship Company could send its representative to ensure proper utilization of fund for the specific purpose.
- ii. The Company will call for appropriate documents to which grants are provided such as Registration Certificate, PAN, Balance sheet and any other documents as required.

6. Role of the Committee:

- i. The CSR Policy is subject to the approval of Board of Directors.
- ii. The Committee will ensure that the amount is spent as per the scope specified in Schedule VII of the Companies Act.
- iii. The Committee shall recommend amount of expenditure to be incurred on the activities in every financial year should be at least 2% of average net profit made during the three immediate preceding financial years as specified in Schedule VII of the Companies Act.
- iv. The CSR Committee will send its representative to validate the project undertaken and to ensure proper utilization of funds.
- v. In case if the specified amount is not spent by the Company then the Director's report should specify the reasons of the amount not spent.
- vi. The Company shall establish monitoring mechanism to monitor CSR policy from time to time and ensure that the amount allocated is spent for the specified purpose only.
- vii. The Committee shall ensure that at any time full compliance with company's respective guidelines, if any, are adhered as to Donations and Sponsoring.

7. Implementation:

- i. Company shall undertake CSR activities through independently registered non-profit organization that have a record of at least three years in such similar CSR activities.
- ii. The investment in CSR wherever possible should be project based and for every project time frame should be finalized at the outset.



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- iii. Project activities identified shall be placed before the Board for their approval. This is to ensure that each project is in line with the CSR Policy
- iv. Based on activities to be undertaken the Board will evaluate the project and disapprove the proposal.
- v. The Company will send its representative to ensure that funds are utilized properly and for the specific purpose.
- vi. Activities in India will only form a part of CSR.

8. Implementing Agency / NGO: Selecting the implementation partner:

- i. The Company will take necessary steps to ensure due diligence is carried out while selecting the implementing partner and will document the process and decision criteria to the full extent.
- ii. This will include submission of various documents as required by the Company such as Registration, Certificate of incorporation, PAN Card etc.
- iii. Competence of the implementation partner with respect to capacity, expertise, number of years of experience, Geography and Sector under consideration.
- iv. The Organization is registered either as a trust, a society or Section 8 Company, or a charitable company, or a Co-operative Society.
- v. Availability of audited financial statements
- vi. Status of Section 12A and Section 80 G registration.

9. Review of Policy

This CSR policy document will be reviewed from time to time and any changes, if necessary, will be recommended by the CSR Committee to the Board and the Board of Directors shall review and approve the recommendations of CSR Committee.

For **Netsurf Communications Private Limited**

Sanjay Malpani

Sanjay Malpani
Director
DIN : 00901995



Sujit Jain

Sujit Jain
Director
DIN : 01463586

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