

CORPORATE SOCIAL RESPONSIBILITY POLICY

OF

EXECUTIVE ACCESS (INDIA) PRIVATE LIMITED

FOR THE FINANCIAL 2022-23

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. POLICY STATEMENT

Corporate Social responsibility is strongly connected with the principles of sustainability; an organization should make decisions based not only on financial factors, but also on the social and environmental consequences. Policy on Corporate Social Responsibility is mandatory as per clause (o) of sub-section (3) of section 135 of the Act and Rule 9 of the Companies (Corporate Social Responsibility) Rules, 2014].

CSR is defined within a framework of Corporate Philosophy which factors the needs of the community and the regions in which corporate entity functions. Therefore, it is the core corporate social responsibility of M/s **EXECUTIVE ACCESS (INDIA) PRIVATE LIMITED** (hereinafter refer to as “the company”) to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interest of its stakeholders.

The Company strives to foster a company culture based on core values that defines the role that we can and should play in society.

- We identify and act upon new opportunities to apply our expertise to societal problems.
- We scale our existing programs and initiatives to achieve maximum benefit.
- We empower our employees and others to serve their communities.

The Company pursues the highest standards of social responsibility, from how we address pressing societal concerns, to support and empower our employees, to how we work with our clients, to how we govern the corporation. We aim to regularly exceed those standards.

Since its inception, the company has been a company that defines itself by fundamental values — not by products, technologies or leaders. Today, shared values are more essential than ever before — for enterprises, for individuals and for the globally integrating society of the 21st century.

These values are:

- a. Dedication to every client’s success
- b. Innovation that matters – for our company and for the world
- c. Trust and personal responsibility in all relationships
- d. Giving back to the society and the nature.

POLICY

The Board of the Company, in order to have a structured approach towards CSR, has decided to formulate CSR Policy. Accordingly, a CSR Policy (“the Policy”) has been formulated with a view to provide a mechanism for meeting the social responsibility of the company in an effective manner to provide optimum benefits to various deserving sections of the society.

The Company comprehensive approach to corporate citizenship aligns with our values and maximizes the impact we can have as a global enterprise. We focus our community engagement and corporate service programs on specific societal issues, including community enablement, economic development, medical advancement, and education. In all our community service efforts, we aim to provide leadership and effect positive change. We also work closely with highly qualified partners who are deeply committed to the same outcomes. Under the aegis of our corporate social responsibility, we do not work with organizations that have religious or political orientation.

2. Objective and Scope

2.1. Objective:

The main objective of the CSR Policy is to lay down guidelines for the Company to make CSR as one of the key focus areas to adhere to the global interest in environment and society that focuses on making a positive contribution to society through effective impact and sustainable development programs. This Policy covers the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities.

Further, to ensure that the Company shall comply with the provisions of the Companies Act, 2013 including any amendment or re-enactment thereof and Rules framed thereunder pertaining to Corporate Social Responsibility including projects or programs relating to activities specified in Schedule VII of the said Act as may be specified in this Policy and approved by the Board of Directors.

2.2. Scope & Coverage:

The CSR activities of the Company shall include, but not limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 amended from time to time. Further, the Company will review the sectors/activities from time to time and make additions/ deletions/ clarifications to the above sectors/activities.

3. CSR Spend

The Companies Act, 2013 prescribes that the companies which meet the criteria specified U/s. Sec. 135 shall allocate certain portion of its annual net profits (calculated as per Sec. 198) during the three immediately preceding financial years to be spent on CSR Activities that fall under the categories specified under Schedule VII of the Act.

3.1. CSR Expenditure:

Net profit for the purpose of allocation towards CSR means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

3.2. Failure to spend the CSR Money:

If the Company fails to spend the required amount in a particular financial year, the Board of Directors in their Annual Report pertaining to that particular Financial Year will report the same. Surplus, if any, arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.

4. CSR Committee

The company has not crossed the threshold limit as set up by the Companies Act, 2013 for the constitution of the CSR Committee, hence, the constitution of the CSR Committee is not applicable to the company.

5. CSR Activities

5.1 Following CSR activities can be undertaken by the Company:

- i) Eradicating hunger, poverty and malnutrition, promoting health care facilities including but not limited to 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 for children, women, including special education and employment enhancing vocation skills especially among 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 economically backward groups.
- iv) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government.
- v) Any other activity as permitted under the Schedule-VII of the Companies Act, 2013.

5.2 Generally, such proposals for contribution shall be considered for which funds/contributions are not easily attracted.

5.3 The Company may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that the CSR Committees/Board of Directors of respective companies are able to report separately on such projects or programs.

5.4 The CSR projects or programs or activities shall be undertaken by the company only in India.

5.5 Surplus, if any, arising out of the CSR projects or programs or activities shall not form part of the business profits of the company and shall be spent on CSR activities.

5.6 Company may build CSR capacities of its own personnel as well as those of its Implementing agencies through Institutions with established track records of at least three financial years but such expenditure, including expenditure on administrative overheads shall not exceed five percent of total CSR expenditure of the company in one financial year.

6. Reporting and Monitoring

6.1 All CSR projects or programs or activities undertaken by the company shall be subjected to periodic reporting of the progress thereof.

6.2 Impact analysis / evaluation of the activities for which contributions are made shall be undertaken by the Board of the Directors as and when required.

7. Disclosure

The Board's report of the company pertaining to a financial year commencing on or after April 1, 2022, shall include a report on CSR containing particulars as specified in the Act or CSR Rules framed thereunder and the same shall be displayed on the company's website.

8. Policy Review and Future Amendment

Unless, the constitution of the CSR Committee is not applicable to the company, any amendment to this Policy and the execution of the identified CSR projects and activities shall be subject to the prior approval of the Board of the Directors of the company. Further, the Board of Directors may revise/amend this CSR Policy to bring the same in line with the guidelines or amendments issued from time to time by the Government on the subject.

9. Web-link where CSR Policy and CSR projects approved by the board are disclosed on the website of the company – <https://executiveaccess.co.in/>

10. Average net profit of the company as per section 135(5) : Rs. 3,06,00,603/-(approx.)
11. Two percent of average net profit of the company as per section 135(5) : Rs. ₹ 6,12,012/- (approx.)
12. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per Section 135(5): NA

For and on behalf of
Executive Access (India) Private Limited



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