

CORPORATE SOCIAL RESPONSIBILITY
POLICY-2023
APEXON

**Ignite Is A Happiness Project That Brings The
Amazing Goodness That Lies Within Us!**

Introduction:

Apexon has been an early adopter of corporate social responsibility (CSR) initiatives. The company strongly believes in the philosophy of giving back to the community and serving the community and society in which the company operates. Apexon Ignite is our “giving back” platform and a testament to this belief. Ignite celebrates our core values of Empathy and Community in making a positive impact beyond our business. Through Ignite, we are focusing on three specific areas- Learning, Skill Development and Women’s Health. We are taking multiple initiatives in these three defined areas through partner organizations. Our associates, including our senior leaders, commit energy, time, and expertise in their enduring efforts to see what we can do as a business for our communities.

A declaration of purpose, the Company's CSR Policy (referred to as the "Policy") distinctly articulates its forward-looking developmental vision. Beyond being a mere document of adherence, it unites us under the banner of the most elevated benchmarks in environmental stewardship. Moreover, it reasserts our dedication to comprehensive integrated growth, propelled by sustainable business methodologies.

Objective of the Policy:

The Policy defines the intent, objectives and approach of the Company and lays down the guiding principles for selection, implementation, monitoring, and evaluation of CSR activities as well as formulation of the Annual Action Plan, for ensuring growth and advancement of marginalized communities.

Focus Areas:

In accordance with the requirements under the Companies Act, 2013 and the rules/regulations framed there under, and circulars/clarifications issued thereunder (collectively, “Applicable Law”), The CSR activities, project and program that will be undertaken by the company shall be those as may be approved by the committee that will be constituted/ reconstituted by the Board of Directors of the company in this regard (CSR committee). Apexon CSR activities, amongst others, will focus on Learning, Skill development and Women’s health. The CSR committee will approve

the undertaking of such activities, projects and programs as are covered in Schedule VII of the Companies Act, 2013.

Learning: Ignite's Ahaan Learning Centre aims to provide education and rich experiences to children from the less privileged strata of society through sports, creativity, drama, and other methods. Ahaan is often the first step of education for hundreds of children. The Ignite groundwork includes selection of the community, enrolment of parents, development of relevant curriculum and guiding the raw children to the path of excellence - in association with our NGO partners.

Skill Development: Ahaan Vocational Centre is Ignite's skill development initiative to create economic opportunities for the youth from less privileged areas. The idea is to empower them to gain financial independence, support their families and rise above their current socio-economic environment. Skill Development Ahaan Vocational Centre "One Youth At A Time!" Special emphasis is on entrepreneurial skill development to create long-term sustainable success. Ignite Team mentors and nurtures budding entrepreneurs with all possible help to design, develop and scale new ventures. Through a mixture of theoretical and practical education, extensive training is provided on emerging vocational and marketable skills. Industry interactions, field visits and soft skills training are an integral part of the course design. Special emphasis is on entrepreneurial skill development to create long-term sustainable success. Ignite Team mentors and nurtures budding entrepreneurs with all possible help to design, develop and scale new ventures.

Women's health: Happy Period is an initiative to promote menstrual wellness and period positivity in the fringe and less privileged schools and sections of society. The delicate topic of menstruation is discussed through a mixture of fun activities, experience sharing, open Q&A and distribution of 'Happy Period' kits.

Governance: The CSR committee of the Company's Board is responsible for governing CSR undertaking, ensuring a transparent, accountable, and robust approach in both global and local contexts in the respective regions.

Composition of CSR Committee: The CSR Committee of the Company has been constituted in accordance with the Act read with the Rules made thereunder.

Responsibilities of the CSR Committee:

i. Formulate/amend and recommend to the Board of Directors of the Company:

a) The CSR Policy of the Company.

b) The Annual Action Plan in pursuance of the CSR Policy, which shall include:

- The list of CSR programmes or projects approved to be undertaken in areas or subjects specified in Schedule VII of the Act.
- The manner of execution of such programmes or projects.
- The modalities of utilization of funds and implementation schedules for the programmes or projects.
- Monitoring & Reporting mechanisms for the programmes or projects; and
- Details of Need and Impact Assessment if any, for the programmes or projects.

ii. Recommend the amount of expenditure to be incurred on CSR activities.

iii. If the amount spent in a financial year is less than the statutory obligation, take note of the reasons for not spending the entire mandatory amount, and recommend to the Board the treatment of the unspent amount as per the provisions of the Act and the Rules made thereunder., & iv. In any financial year, if the CSR spending is in excess of the amount obligated in terms of the Act, recommend to the Board set off of excess spent as per the provisions of the Act and the Rules made thereunder.

v. Monitor the CSR Policy and the Annual Action Plan for the CSR activities of the Company from time to time.

vi. Institute a transparent monitoring mechanism for the implementation of CSR projects or programs or activities undertaken by the Company. vii. Review the need for Impact Assessment, if any, for the projects or programmes.

Responsibilities of the Board:

- i. Approve the CSR Policy and any amendments thereof and the Annual Action Plan, based on the recommendation of the CSR Committee.
- ii. Disclose the CSR Policy as per the requirements specified in the Act and the Rules framed thereunder.
- iii. Ensure that the CSR activities are undertaken by the Company as per the CSR Policy.
- iv. Ensure that the Company spends the amount indicated in the Act and the Rules framed thereunder in every financial year in pursuance of its CSR Policy.
- v. If the amount spent in a financial year is less than the statutory obligation, take note of the reasons for not spending the entire mandatory amount, and ensure that the unspent amount is treated as per the provisions of the Act and the Rules made thereunder.
- vi. In any financial year, if the CSR spending is in excess of the amount obligated in terms of the Act, set off of excess spent as per the provisions of the Act and the Rules made thereunder.
- vii. Ensure that the CSR funds disbursed have been utilized for the purposes and in the manner as approved and obtain a certificate from the Chief Financial Officer of the Company to its effect.
- viii. Alter the Annual Action Plan at any time, if required, during the financial year based on reasonable justification and on the recommendation of the CSR Committee.
- ix. Monitor the implementation of projects with reference to the approved timelines and year-wise allocation as per the provisions of the Act and the Rules.
- x. Ensure that the Company undertakes impact assessment of the programmes or projects as per the provisions of the Act read with the Rules made thereunder and take note of the impact assessment reports, if any, undertaken by the Company

Financial:

- i. The Company shall spend the amount indicated in the Act and the Rules to fulfil its CSR objectives. Any short / excess spent shall be treated as per the provisions of the Act.
- ii. Programmes/projects shall be identified, and budgets shall be allocated for such activities through a process incorporating identification of suitable implementation agencies, need assessment (where required) and clear outlining of desired outcomes.
- iii. In the event the Company makes any surplus from its CSR programmes/projects, the same shall not form part of the business profit and shall be treated in the manner as mentioned in the Act and the Rules made thereunder.
- iv. Salary of staff engaged in CSR activities may be included in the CSR expenditure.
- v. CSR expenditure of the Company may include the creation or acquisition of capital assets which shall be held by Apexon Ignite/beneficiaries/Public Authority.
- vi. Expenditure towards need and impact assessment of CSR programmes/ projects shall be booked as per the limits prescribed in the Act and the Rules.
- vii. Administrative overheads shall not exceed the limits prescribed in the Act and the Rules for a financial year.

GUIDING PRINCIPLES FOR SELECTION IMPLEMENTATION, MONITORING & EVALUATION OF CSR ACTIVITIES**a) Selection:**

- i. The Company and/or Apexon Ignite will receive proposals for PAN India implementation based on need assessment (wherever applicable) through well-publicized RFPs (Request for Proposals) for funding projects during the Financial Year.
- ii. CSR programme/project proposals shall include Need Assessment, Baseline Survey where required. Enumeration of end goals/outcomes/Impact/theory of change. Specification of start

date and end date. Allocation of budget. Clear identification of beneficiaries. Clear identification of milestones for the complete duration of the programme/project.

iii. Apexon Ignite's panel of experts shall transparently evaluate proposals received and projects and partners will be prioritized for approval by assessing their potential for sustainability, scale, and impact. Opportunities for complementing/supplementing Government initiatives/programmes/projects will be explored. However, funds will not be deposited in Government accounts except where the Act/Rules clearly specify such requirements.

iv. The Company may engage international organizations for designing, monitoring, and evaluating the CSR programmes or projects, as well as for the capacity building of its own personnel for CSR. v. Agreements shall be signed with implementing agencies qualified to undertake CSR activities under The Act / Government Departments / Agencies for each approved project clearly outlining deliverables, timelines, and budget.

b) Implementation, monitoring & evaluation:

i. A progress report on a periodic basis of all programmes and projects shall be provided to the Board by the CSR Committee.

ii. Apexon Ignite shall report the progress of all programmes and projects to the CSR Committee.

iii. A comprehensive monitoring mechanism will be devised by the Company to ensure that the CSR process functions as mandated by the Act and the Rules, ensuring that all programmes/projects are duly implemented within stated timelines and budget. This will be done based on the following: a. To ensure a firm check on spending and the actual implementation of activities as planned. b. Release of CSR funds only against verified utilizations.

iv. The monitoring system devised by the Company will include a. Regular field visits to programme/project sites by designated staff/teams. b. Comprehensive documentation /compilation of field reports, including picture and video-based monitoring. Monitoring systems will also be in place. c. Regular interaction with beneficiary communities to obtain feedback. d. Monitoring of timely fund utilization to ensure that programmes/projects as budgeted are being

carried out, and e. Any other activity that the CSR Committee may deem necessary in the larger interest of its CSR initiatives.

v. Concurrent and final evaluation of CSR programmes and projects shall be undertaken by the Company.

Documentation: The Company shall undertake a comprehensive compilation of programmes and projects in Digital Formats, Audio / Video Recording, social media, Printed Material etc.

Accounting and Audit: Programmatic and Financial Accounting of all programmes and projects shall be undertaken. Accounting and Audit guidelines shall be followed as mandated/approved by the Ministry of Corporate Affairs, Government of India or as may be prescribed by the concerned Competent Authority in Government of India.