

CORPORATE SOCIAL RESPONSIBILITY POLICY (“CSR POLICY”)

1.0 Introduction

SunTec Business Solutions Private Limited (hereinafter referred as “**the Company**”) since its inception has seen itself as a corporate citizen responsible to the society and has pioneered in undertaking activities which promote various social and charitable objectives.

In order to carry out the charitable activities in a structured manner and to streamline and provide more focus and direction to the activities undertaken by the Company in its sphere, it is decided to formulate a policy on Corporate Social Responsibility (hereinafter referred as “**the Policy**”). This policy has been prepared in line with the requirements of the Section 135 of the Companies Act, 2013 (hereinafter referred as “the Act”) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred as “the rules”).

2.0 Our Commitment

SunTec recognizes that its operations have an effect on the communities and environment in which it operates. In light of this, SunTec is committed to espouse social and charitable causes as well as running its operations in an environmentally sustainable manner.

3.0 Objective

- 3.1** To meet the social obligations of SunTec and its associates along with their business interests
- 3.2** To help improve the quality of life of the people living in the areas in which SunTec operates
- 3.3** To instil a sense of achievement for SunTec associates
- 3.4** To communicate to the world that SunTec and its associates adhere to the best Corporate governance codes.

4.0 Applicability

- 4.1** This Policy shall apply to all CSR projects/programs undertaken by the Company in India as per Schedule VII of the Act.
- 4.2** This policy will apply to the organization as a whole, including all the branch offices, divisions both present and future.

5.0 CSR Committee.

5.1 The company in its meeting of Board of Director dated 30th June 2014 for the first time constituted a CSR committee consisting of following Directors.

- i. Mr. Nandakumar K
- ii. Mr. G. VijayaRaghavan
- iii. Mrs. Asha B.

5.2 The committee was entrusted the following tasks.

- a) Formulate and recommend to the Board, a Corporate Social Responsibility Policy (CSR Policy) which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the act.
- b) Monitor the Corporate Social Responsibility Policy of the company from time to time.
- c) Recommend the amount of expenditure to be incurred on the activities referred to in clause (a) above.
- d) Institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the company.
- e) Dedicate a CSR Team to implement the CSR Projects or programs.

5.3 Approval Matrix

All CSR Expenditure upto Rs.1 Crore per transaction can be authorized by Mr. Nandakumar K, Managing Director by email

Any CSR Expenditure beyond Rs. 1 Crore should be authorized by Mr. Nandakumar.K, Managing Director along with approval of one of other CSR Committee member by email

All CSR Expenditure authorized shall be placed before the next meeting of CSR Committee for approval.

6.0 Framework and Delivery

6.1 SunTec's CSR team is committed to supporting deserving causes that deal specifically with Education, Health and Environmental activities etc. The activities of the team shall be monitored by the CSR Committee. The CSR Programs shall be implemented through registered and accredited trust, any other section 8 Company, society or NGO or in collaboration with other companies as may be approved by the CSR Committee

6.2 The Company shall undertake the activities including the following;

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and 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
- v. Protection of national heritage, art and culture including restoration of building and sites of historical importance and works of art and setting up of public libraries
- 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 Olympic 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 Schedules 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. Any other activities / programs / initiatives, which are in conformity with the activities to be undertaken in areas or subjects specified in Schedule VII

to the Act (as amended from time to time by way of issue of circular/ notifications/ guidelines by the competent authority)

7.0 The CSR Budget

The amount of expenditure to be spent for CSR and the projects, programs or activities undertaken in each financial year will be recommended by the CSR Committee of the Company and the same will be approved by the Board of Directors with or without modification in their meeting.

8.0 Treatment of Surpluses

Any surplus generated from CSR projects undertaken by the Company will be added to the total CSR budget of the respective financial year. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.

9.0 CSR Monitoring and Reporting mechanism

The CSR Committee shall monitor the amount of expenditure as approved by the Board of Company on a periodic basis. Apart from the above, the Directors' Report of the Company shall include an annual report on CSR containing the particulars in the prescribed format.

10.0 Display of the CSR Policy in the website of the Company

This policy approved by the Board of Directors of the Company has been placed in the website of the Company.

11.0 Amendments

The Board of Directors of the Company shall have the power to amend or substitute any of the provisions of this Policy or replace this Policy in its entirety with a new Policy on recommendation of the CSR Committee.
