

Crest Data Systems Private Limited
(the “Company”/ “Crest Data”)

Corporate Social Responsibility Policy

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Revision prepared by:	Mili Khamar
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Revision prepared by:	Mili Khamar
Revision approved by:	Board of Directors
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At Crest Data, we recognise our social obligations, believe in giving back to the society, where we live, work, and do business and in line with our core values, we believe in being part of building a better tomorrow. Our aim is to uplift the deprived with better community health, access to quality education and improved livelihood opportunities.

Our CSR vision is to create and support meaningful activities which can address and uplift the society for a better tomorrow through our CSR initiatives. The CSR initiatives undertaken by the Company should be scalable and sustainable on a long-term basis and generate value for all.

1. Applicability and adoption of this CSR Policy

This CSR Policy has been formulated by the Corporate Social Responsibility Committee (“**CSR Committee**”) of the Company and after taking into account the recommendations by the CSR Committee, the Board of Directors of the Company (the “**Board**”) has approved and adopted the same. Any or all provisions of this Policy are subject to the applicable provisions of the Companies Act, 2013 read with the rules made thereunder and any subsequent amendments thereof made from time to time (the “**Act**”). This CSR Policy has been formulated for effective implementation of all the CSR projects to be undertaken by the Company in compliance with the applicable laws including the Act. The Policy shall be effective from the date of approval of the Board of Directors of the Company.

2. Our CSR Model

The Company may undertake various CSR projects, programs and activities from time to time. Such projects, programs and activities will be undertaken keeping in mind with the permissible activities under the applicable laws. It shall be at the discretion of the Company to undertake, modify, amend, implement and/or cancel CSR projects, programs and activities from time to time as it deems fit in compliance with the provisions of the Companies Act, 2013 read with the rules made thereunder. The Company aims to fulfil the requirements laid down under the Companies Act, 2013 and act diligently to comply with all its rules and regulations applicable for CSR.

i. Our CSR focus areas

With an aim to maximise the impact and generate value for all, we will initially undertake one or more of the following activities under the ambit of CSR (either independently or in collaboration with other entities):

a. Education

Promoting education, including special education and employment-enhancing vocational skills, especially among children, women, the elderly and the differently abled, and livelihood enhancement projects

b. Hunger, Poverty, Malnutrition, Healthcare and Sanitation

Eradicating extreme hunger, poverty and malnutrition including support meal or nutrition related programs, address issues around affordability and accessibility of quality healthcare, promoting healthcare including preventive healthcare and sanitation and making available safe drinking water.

c. Rural transformation

Development and improvement of infrastructure and essential amenities, livelihood in rural areas.

d. Environmental sustainability

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

e. Community Development, Gender Equality and Empowerment of Women

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

f. Disaster response

Timely relief and rehabilitation of communities affected by disaster. Organise training, education, and rehabilitating disaster affected victims.

g. Traffic Awareness

Promoting road safety, traffic awareness, and public education by undertaking initiatives such as developing and maintaining traffic islands, installing safety signage, collaborating with relevant authorities to enhance road safety infrastructure, conducting awareness campaigns to reduce road accidents, encouraging responsible driving behaviour, and improving public understanding of traffic rules and regulations.

h. Other Initiatives

Any other projects, programs and activities falling within the permissible activities prescribed under Companies Act, 2013 and Schedule I hereto.

ii. Project selection framework

CSR Committee may select the CSR projects considering the organisational vision and mission for CSR and the followings:

- Sustainability of the projects;
- Impact on large scale;
- Address the major problems of society at large;
- Generate values for all

CSR committee shall determine the project priorities based on the need of the project (the project may include multi-year (ongoing) projects or one-time projects and shall recommend the Board the project selected by them and the Board shall ratify the same as it deems fit.

iii. Mode of Implementation of CSR initiatives

CSR initiatives of the Company will be implemented directly or through:

- a) a company established under section 8 of the Companies Act, 2013/ section 25 of the Companies Act, 1956 or a registered trust, society, registered under section 12A and 80 G of the Income Tax Act, 1961, established by the Company, either singly or along with any other company; or
- b) a company established under section 8 of the Companies Act, 2013/ section 25 of the Companies Act, 1956 or a registered trust or a registered society, established by the Central Government or State Government; or
- c) any entity established under an Act of Parliament or a State legislature; or
- d) a company established under section 8 of the Companies Act, 2013/ section 25 of the Companies Act, 1956, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least 3 (three) years in undertaking similar activities; or
- e) The Company may also collaborate with other companies or institutions for undertaking projects or programs for CSR activities.

CSR Committee shall ensure that if the projects are being implemented through a company established under section 8 of the Companies Act, 2013/ section 25 of the Companies Act, 1956 or a registered trust or a registered society, such organisation is/ shall in compliance with the requirements specified under the Companies Act, 2013 read with rules made thereunder.

3. Governance**i. Corporate Social Responsibility Committee (CSR Committee)**

The Board of Directors have constituted the CSR Committee in accordance with the applicable law. The CSR Committee consist of following members:

1. Beena Manoj Shah - Chairperson
2. Neha Malhar Shah - Member
3. Manoj Rasiklal Shah – Member

The CSR Committee would meet as and when required. The quorum of the CSR Committee meeting would be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.

ii. Role of CSR Committee:

- a. To formulate and recommend to the Board, a CSR policy which shall indicate the projects/ activities to be undertaken by the Company as per the Companies Act, 2013 and rules made thereunder;
- b. To review and recommend the amount of expenditure to be incurred on the projects/ activities to be undertaken by the Company;
- c. To formulate and recommend to the Board, an annual action plan in pursuance of CSR Policy, which shall include following, namely:
 - i. the list of CSR projects or activities that are approved to be undertaken in areas or subjects specified under the Companies Act, 2013 and rules made thereunder;
 - ii. the manner of execution of such projects/ activities/ areas as specified the Companies Act, 2013 and rules made thereunder;

- iii. the modalities of utilisation of funds and implementation schedule for the projects/ activities;
 - iv. monitoring and reporting mechanism for the projects/ activities;
 - v. details of need and impact assessment, if any, for the projects/ activities referred herein above.
- d. To monitor the CSR policy of the Company from time to time;
 - e. Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect.
 - f. The CSR Committee may appoint / entrust certain persons to whom selected activities of the CSR Committee could be delegated.
 - g. Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors from time to time.

iii. CSR spending/ Budget

- a) The Board of Directors shall ensure that minimum of 2% of average net profit of the last 3 years is spent on CSR initiatives undertaken by the Company.
- b) All expenditure towards the programs to be diligently documented.
- c) In case at least 2% of average net profit of the last 3 years is not spent in a financial year, reasons for the same to be specified in the CSR report.
- d) Any surplus generated out of the CSR activities not to be added to the normal business profits of the Company.

iv. CSR annual action Plan

The CSR Committee shall formulate and recommend to the Board of Directors, An annual action plan for CSR in accordance with this Policy and applicable laws, which shall include followings:

- (a) the list of approved CSR projects/ activities/ areas;
- (b) the manner of execution of such projects/ activities;
- (c) the modalities of utilisation of funds and implementation schedules;
- (d) monitoring and reporting mechanism for the projects/ activities;
- (e) details of need and impact assessment, if any, for the projects/ activities undertaken by the company.

The Board of Directors may approve the annual action plan with such further conditions as it deems fit and further alter the plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

v. Monitoring & Impact

CSR Committee shall monitor the implementation of various programs, projects and activities in such manner as it deems fit and as directed by the Board. CSR Committee shall also determine the manner of submission of information, reports, files, etc. by third parties as a part of the monitoring process. CSR Committee shall ensure that a transparent monitoring mechanism is put in place for effective implementation of CSR projects. In the event the Company wishes to implement the CSR activities undertaken by it through a registered Trust or Society or through a Company registered under section 8 of the Companies Act, 2013, a report on the progress made by such Trust / Society / Company is to be submitted on a quarterly basis to the CSR Committee for its review and recommendations for the multi-year (ongoing) projects and periodically as mutually decided by the parties for one time projects. The CSR Committee shall periodically report to the Board on the progress made by the Company in implementing the CSR activities undertaken by it.

vi. Reporting:

- (i) The Board's report shall include an annual report on CSR, projects, programs and activities undertaken by the Company in the relevant financial year as required under the Act.
- (ii) If the Company fails to spend the prescribed amount on CSR activities, the Board's Report shall specify reasons for not spending the amount.
- (iii) This policy shall be disclosed on the website on the Company.

4. Amendments

The Policy may be reviewed and amended from time to time by the Board as required, based on the recommendation of the CSR Committee.

5. General

Words and expressions used but not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013 read with the rules made thereunder including amendment thereto. This Policy shall also be subject to such clarifications and FAQs as may be issued by Ministry of Corporate Affairs from time to time.

The Company reserves the right to modify, cancel, add, or amend any of the content of this Policy subject to applicable laws.

Schedule I**CSR activities to be undertaken by the Company**

Below is the list of activities that can be undertaken by the Company in general under CSR as mentioned in clause 2(i)(g) of the CSR Policy of the Company. The Company may take up one or more of the below activities in compliance with the applicable laws:

1. Eradicating hunger, poverty and malnutrition, promoting and preventive healthcare and sanitation including contribution to the Swachh Bharat Kosh set up by the Central Government and making available safe drinking water.
2. Promotion of education, including special education and employment enhancing vocation skills especially among children, woman, elderly and the differently abled persons and livelihood enhancement projects.
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, setting up of day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources, maintaining quality of soil, air and water including contribution to Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
5. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up of public libraries; promotion and development of traditional arts and handicrafts;
6. Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
7. Training to promote rural sports, nationally recognized sports and Paralympics sports and Olympic sports;

8. Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the of the schedule caste, tribes, other backward classes, minorities and women;
9. Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government, Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
10. Rural development projects
11. Development of Slum Areas.
12. Disaster management, including relief, rehabilitation and reconstruction activities
13. Promoting road safety, traffic awareness, and public education by undertaking initiatives such as developing and maintaining traffic islands, installing safety signage, collaborating with relevant authorities to enhance road safety infrastructure, conducting awareness campaigns to reduce road accidents, encouraging responsible driving behaviour, and improving public understanding of traffic rules and regulations.
14. Any other activity as may be included in Schedule VII of the Companies Act, 2013 from time to time or under any provisions of the Companies Act, 2013 pertaining to CSR.
