

NEWGEN IT
TECHNOLOGIES LIMITED

(Formerly VCARE Infotech Solutions and Services Pvt Limited)

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CORPORATE SOCIAL
RESPONSIBILITY POLICY
(CSR POLICY)

Version History:

Sr. No.	Version No.	Date	Version Details	Person
1	1.0		Initial Draft	Team

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1. PURPOSE:

Corporate Social Responsibility (CSR) is a Company's sense of responsibility towards the ecological, physical and social environment in which it operates. Through CSR corporate entities achieve balance on economic, environmental and social imperatives with their operations and development.

This policy sets out the Company's commitment & approach towards Corporate Social Responsibility. The Company intends to be a significant contributor to CSR initiatives in India by devising and implementing social improvement projects for the benefit of underprivileged communities, towns and villages.

2. Focus Areas

In accordance with the requirements of the Companies Act, 2013 ("the Act"), the Company's CSR programs shall mainly focus on the following areas:

- Vocational skill development programs or providing support for Academic Education and Technical support to underprivileged children
- Preserve & promote indigenous heritage and culture
- Income-generation and livelihood enhancement support
- support various animal welfare projects such as provide shelters to stray cows, and other animals.

However, the Company may choose to undertake additional CSR Activities falling within the purview of Schedule VII of the Act, as may be amended from time to time, based on the recommendations of the CSR Committee and as may be approved by the Board of Directors.

3. DELEGATION OF POWERS TO BOARD FOR CSR ACTIVITIES

As the total CSR liability towards CSR activities to be spent by the company is below fifty lakhs, it was decided and approved to delegate the powers to Board for CSR activities and the Board shall be responsible for initiating, monitoring and reviewing CSR activities of the Company undertaken by it from time to time.

- Responsibility of the Board of Directors

The Board shall be responsible for –

- Approving the CSR policy of the Company as the Board may deem fit.
 - Ensuring that in each financial year the Company spends such amounts for CSR activities as may be stipulated in the Act, as amended from time to time. (presently 2% of the average net profits of the Company made during the three immediate preceding financial years)
 - Ensuring that the activities as are included in the CSR Policy are undertaken by the Company
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itself or through the entities recognized for CSR implementation under the Companies (Corporate Social Responsibility Policy) Rules (“CSR Rules”) as amended from time to time.

- Satisfying itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it.
- Monitoring the implementation of the ongoing projects with reference to the approved timelines and year-wise allocation and making modifications, if any, for smooth implementation of the projects within the overall permissible time period.
- Approving an Annual Action Plan as may be recommended by the CSR Committee, subject to necessary changes/modifications as the Board may deem fit, based on the reasonable justification to that effect.
- Ensuring that the administrative overheads do not exceed five percent of total CSR expenditure of the Company for the financial year.
- Approving, by means of a resolution, the carry forward of excess amounts spent towards CSR during a particular financial year against the CSR obligations of the Company for upto three immediately succeeding financial years
- Reviewing the Impact Assessment Reports to be annexed to the Company’s annual report on CSR activities
- Displaying the composition of the CSR Committee, CSR Policy and CSR Projects approved by it on the Company’s website.
- all other activities as informed or delegated by the Board of Directors from time to time.

4. CSR EXPENDITURE

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.

5. IMPLEMENTATION OF CSR ACTIVITIES

The Company shall implement the identified CSR activities by the following means:

- The Company may itself implement the identified CSR activities presently within the scope of the Thrust Areas as defined in the Policy;
- The Company may also implement identified CSR activities presently through its Trust which is involved in CSR activities within the scope of the Thrust Areas as defined in the Policy;
- The Committee may undertake the CSR activities through following implementing agencies:
 - Directly, or
 - A Company established under Section 8 of the Act, or
 - A Registered Public Trust, or
 - A Registered Society,

established by the Central Government or State Government either singly or along with any other Company having a track record of at least 3 years in undertaking similar activities established under an Act of Parliament or a State Legislature.

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- The Company may collaborate with other companies including its Group Companies if required for undertaking the projects or programs or activities of CSR subject to the conditions.
 - The Company may engage the international organizations as notified by Central Government for designing, monitoring and evaluation of the CSR projects or programs as per its CSR policy.

6. ANNUAL ACTION PLAN

An Annual Action plan would be formulated basis the available CSR budgets and shall include the list of CSR projects or programs which company plans to undertake during the financial year, further specifying modalities of execution of such project or programs, their implementation schedules, monitoring and reporting mechanism for such projects and need of impact assessment, if any for the said projects.

7. IMPACT ASSESSMENT

If the Company having average CSR obligation of Rs. 10 Crores (Rupees Ten crores) or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, the Company will undertake impact assessment (through an independent agency) for CSR projects that have outlays of Rs. 1 crore or more and have been completed atleast one year before undertaking the impact study and the impact assessment reports will be placed before the Board and disclosed as per the Act and CSR Rules.

8. Stakeholder Communication

We shall ensure relevant updates regarding our key projects and its impact through our Annual Report and other relevant mechanisms from time to time.

- Guiding Principles for selection, implementation and monitoring of CSR activities

The Company is eligible to undertake any rightful/suitable activity as specified in Schedule VII of the Act. At present, the Company shall focus to undertake on the following areas:

- Vocational skill development programs or providing support for Academic Education and Technical support to underprivileged children
- Preserve & promote indigenous heritage and culture
- Income-generation and livelihood enhancement support
- support various animal welfare projects such as provide shelters to stray cows, and other animals.

9. Target Communities & Project Locations

The Company's target communities shall include **rural, less-privileged, children youth and women, etc** and other such groups associated with our focus areas. Relevant projects and locations pertaining to the above focus areas and target communities shall be undertaken around our areas of operation as well as other 'identified locations' from time to time.

10. Implementation & Monitoring Structure

CSR Programs of the Company shall be undertaken through **CSR committee at Board level** which will provide broad direction for CSR planning and conducts reviews to ensure desired impact.

11. Project Monitoring

- The Project Monitoring team will ensure that the CSR Policy is implemented as per the Act and the Rules ensuring that all projects as budgeted are duly carried out.
 - All CSR spends will be closely **monitored and audited** in an accountable and transparent manner
 - Project monitoring shall include periodic field visits, **comprehensive documentation**, and if required interaction with beneficiary communities.
 - The CSR Committee shall **periodically review the CSR project** reports and the same shall be annually presented to the Board.
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