



**CORPORATE SOCIAL RESPONSIBILITY POLICY OF
EASEBUZZ PRIVATE LIMITED**

FY 2021-22

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I. CSR Philosophy

The Corporate Social Responsibility (CSR) philosophy of the Company is to make meaningful and measurable contributions in the lives of socially, economically, financially and physically excluded, disadvantaged and challenged communities of the country through an integrated approach of development that focuses on creating opportunities for enhancing livelihood opportunities, improving quality of education and skills development, creating awareness amongst public at large on topics of financial literacy, health and hygiene, promoting environmental sustainability, and supporting health and sanitation initiatives which may be implemented either directly by itself or through or through any other Non-Government Organizations or Trust, as set out in the Annual Action Plan (AAP), approved by the Board of Directors (the Board) of the Company from time to time.

II. CSR Policy

The Company recognizes the importance of good corporate governance and corporate social responsibility in promoting and strengthening the trust of its shareholders and other stakeholders. or through any other Non-Government Organizations or Trust.

The CSR Policy shall be guided by the Company's corporate vision and the aspiration to be the Company of Choice for Customers, Shareholders, Employees and Community.

The Company's CSR Policy has been framed in accordance with Section 135 of the Companies Act 2013 and the rules framed thereunder. The Policy shall apply to all CSR programs undertaken/sponsored by the Company as specified under Schedule VII of the Companies Act, 2013. executed by itself and to the contributions made by the Company to Prime Minister's National Relief Fund or any other fund set up by the Government under Schedule VII of the Companies Act, 2013.

III. CSR Governance and Management Structure

Governance 1 – Board of Directors

The Board of Directors of the Company (the Board) is the highest governing body responsible for the Company's CSR activities. The Board shall review the recommendations made by the CSR Committee, in respect of the following matters, in compliance with the CSR norms and the CSR Policy.

- i. Formulation and review of the CSR Policy;

- ii. Reviewing proposals for Ongoing as well as 'other than ongoing' CSR Project(s)/Program (s) to be undertaken/supported by the Company, in terms of the CSR Policy and allocation of funds for the same;
- iii. Review of the Annual Action Plan in relation to the CSR Project(s)/Program(s), to be undertaken by the Company, during a financial year ,
- iv. Review of the Individual Implementation Plans for the CSR Project(s)/Program(s), to be undertaken by the Company, under the Annual Action Plan, during a financial year;
- v. Monitoring the usage of funds allocated for each Ongoing/Other than Ongoing CSR Project(s)/Program(s), and satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and review and take on record the certificate issued by the Chief Financial Officer (CFO) of the Company, to that effect;
- vi. Such other matters as mandated under the CSR norms, as amended and notified, fromtime to time.

The duties and responsibilities of the Board in terms of the CSR norms shall be stated in its Charter.

Governance 2 - CSR Committee of the Board of Directors

The CSR Committee which has been constituted in terms of Section 135 of the Companies Act, 2013 and the Rules framed thereunder, has been appointed by the Board as the nodal agency that shall review the recommendations made by the Management with regards to the aforesaid matters and make appropriate recommendations to the Board.

The duties and responsibilities of the CSR Committee, in terms of the CSR norms, shall be stated in its Charter.

Composition of the CSR Committee as approved by the Board is as follows:

- | | | |
|----|--------------------|----------|
| 1. | Mr. Amit Kumar | Chairman |
| 2. | Mr. Siddharth Dani | Member |
| 3. | Mr. Apoorv Gautam | Member |

The Executive Director, who is a member of the CSR Committee is entrusted with the task of administering the CSR Policy.

Governance 3 - Chief Financial Officer (CFO)

The Chief Financial Officer of the Company shall certify that the funds allocated for the CSR

Project(s)/Program(s) that have been disbursed as per the Board approved Annual Action Plan, have been utilized for the stated purposes and in the manner as approved.

IV. Annual Action Plan (AAP)

In alignment with the Rules, the CSR Committee shall formulate an Annual Action Plan that shall include the modalities of each CSR Project/Program that the Company shall undertake in a financial year, as guided by the Rules.

The CSR Committee shall, in consultation with the Company's Management, recommend to the Board, the Annual Action Plan in pursuance of the CSR Policy as stipulated by the Rules.

V. CSR Project(s)/Program(s)

The Company shall undertake CSR Project(s)/Program(s) in accordance with Schedule VII of the Companies Act 2013 and the relevant provisions of the Companies (Corporate Social Responsibility Policy Amendment) Rules, 2021, as set out in **Annexure I**, to this Policy.

However, it shall not undertake CSR Project(s)/ Program(s) under any of the areas which is specifically prohibited in terms of the said Rules, as set out in **Annexure II**, to this Policy.

VI. Manner of execution of CSR Project(s)/Program(s)

The Company shall undertake CSR Project(s)/Program(s) in relation to the said areas specified in **Annexure I** to this Policy, directly by itself or through or through any other Non-Government Organizations or Trust.

The CSR Committee shall review the recommendations made by the Company's Management with regards to the CSR Project(s)/Program(s) proposed to be undertaken, decide the manner in which they shall be implemented and allocate adequate funds, subject to availability of net profits, to be calculated in the manner as stated in the CSR norms.

The CSR Committee shall ensure that only those CSR Project(s)/Program(s) are undertaken that are stated/added in the Annual Action Plan, as approved by the Board.

The Company may undertake multi-year Project(s)/Program(s) with a duration of upto four years including the year of the launch of the Project(s)/Program(s). Such Project(s)/Program(s) may be renewed by the Company for additional period(s) after the completion of the initial four-year

period subject to satisfactory performance and impact of the Project(s)/Program(s). The Company may also, if deemed appropriate, undertake other than on-going Project(s) during the year, the decision of which shall be taken on a case-to-case basis and will be subject to approval of the Board and will form part of the Annual Action Plan.

VII. CSR Budget

The Company is committed to spend in each financial year, the mandatory 2% of the average net profits of the preceding three financial years as calculated under the provisions of Section 198 of the Companies Act 2013 for undertaking CSR Project(s)/Program(s) as set out in the CSR Policy.

- i. The CSR Committee shall take into account the recommendations of the Company's Management whilst finalizing the amount(s) allocated for the individual Project(s)/Program(s) to be undertaken by the Company during a financial year and will be included in the Annual Action Plan.
- ii. In the event the Company fails to spend the mandated amount for CSR Project(s)/Program(s) in any financial year, the Board shall assess the reasons for such non-compliance and state the reasons in its CSR Report forming part of the Company's Annual Report, and ensure the transfer of the unspent CSR funds to the Unspent CSR Account or to a Fund(s) included in Schedule VII of the Companies Act 2013 for Ongoing and Other than ongoing CSR projects, respectively, within the timelines stipulated in the Rules.
- iii. In the event the Company expends an amount for CSR Project(s)/Program(s) in excess of the spending requirement of the Company in a financial year, the CSR Committee may recommend to the Board setting off the excess amount against the CSR spending requirement of the Company for the 3 immediate succeeding financial years.
- iv. The Company shall ensure that surpluses, if any, arising out of its CSR Project(s)/Program (s) shall not form part of the business profit of the Company and shall be ploughed back to the respective Project(s)/Program(s).

VIII. Modalities of utilization of funds and implementation schedules for CSR Project(s)/ Program(s)

The Company shall establish an effective mechanism with regard to the Monitoring and reporting the status of usage of funds allocated for CSR Project(s)/ Program(s) and ensure that such funds are being spent for stated objectives and in the manner as set out in the Annual Action Plan as approved by the Board.

IX. Monitoring Mechanisms

The Company shall, on an ongoing basis, monitor the following aspects from a regulatory as well as good governance perspective.

- i. Every entity that intends to partner with the Company for undertaking CSR Project(s)/Program(s) has registered itself with the Central Government by filing the Form CSR-1 electronically with the Registrar;
- ii. Objectives for each Project/Program are developed out of societal needs and are in line with the CSR Policy of the Company.
- iii. Targets, milestones and other measurable parameters, are prescribed, wherever possible.
- iv. A progressive monitoring and reporting framework, aligned to the requirements under the Act and the Rules made thereunder, is put in place.
- v. Such monitoring framework may include site visits by members of the CSR Committee and senior officers of the Company and such other interventions as deemed appropriate by the Company.

The Company shall ensure that the aforesaid matters are placed for the review of the CSR Committee on an annual basis to enable the CSR Committee to make appropriate recommendations to the Board, in compliance with the CSR norms and this Policy.

X. Impact Assessment

Currently, provisions w.r.t. Impact Assessment are not applicable to the Company. However, whenever the provisions are applicable, the Company shall strive to measure the impact of its CSR Project(s)/Program(s) at regular intervals through appropriate mechanisms and undertake impact assessments in alignment with the prevalent CSR Rules.

XI. Reporting Framework

- (i) The CSR Committee shall review, on annual basis:
 - a. Details of the CSR Project(s)/Program(s) that have been undertaken by the Company as per the Annual Action Plan and duly approved by the Board
 - b. Status of its implementation under the Board approved Annual Action Plan for each such CSR Project/Program
 - c. The CSR Funds allocated and utilized as per the Annual Action Plan
 - d. Amounts which remain unutilized at the end of every financial year as per the Annual Action Plan
- (ii) The Company shall ensure that the said details as reviewed by the CSR Committee along with their recommendations are placed for the review of the Board, on an annual basis.
- (iii) The status of the usage of the CSR Funds so allocated for CSR Project(s)/Program(s) as approved by the Board shall be reviewed and certified by the Chief Financial Officer of the Company and such certificate shall be placed before the Board annually.

XII. Capital Assets:

In the course of implementation of the Company's CSR Project(s)/Program(s), the Company shall ensure that for any capital asset so created, its ownership shall rest solely with a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number; or, beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or public authority, as stipulated in the Rules.

XIII. Disclosures and related Compliances:

- i. The Company shall ensure that requisite disclosures are made in its Annual Report in the prescribed format, containing details relating to the CSR Committee, CSR Projects, CSR spends carried forward and/or set off, and such other information, as prescribed in the Companies Act, 2013 and the Companies (CSR Policy) Rules, as amended and notified from time-to-time;
- ii. The Company shall perform such other duties with respect to its CSR activities as may be required under any law, statute, rules, regulations etc. as may be enacted by Government of India, the Reserve Bank of India or by any other regulatory/statutory authority or as mandated by the Board, from time to time.

XIV. Authority and Review:

This CSR Policy shall be reviewed at least once annually and/ or pursuant to any amendments to the CSR norms or for any reason as deemed appropriate by the CSR Committee/ Board. Any amendment to the CSR Policy shall be reviewed by the CSR Committee and subject to the review and approval of the Board.

The CSR Policy has been reviewed by the CSR Committee at its meeting held on October 27, 2021 and reviewed and approved by the Board of Directors (the Board) of the Company at its meeting held on October 27, 2021. The CSR Policy shall be deemed to have come into effect from the said date.

ANNEXURE I:

An illustrative list of the CSR areas under which CSR Project(s)/Program(s) may be undertaken by the Company, are given below:

1. Eradicating hunger, poverty and malnutrition, promoting health care including 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.
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
3. 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.
4. 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 including contribution to the 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 public libraries; promotion and development of traditional art 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, Paralympic 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 govt. for socio economic development and relief and welfare 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;

10. 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);
11. Rural development projects;
12. Slum area development;
13. Disaster management, including relief, rehabilitation and reconstruction activities.

ANNEXURE II:

Corporate Social Responsibility (CSR)" means the activities undertaken by a Company in pursuance of its statutory obligation laid down in Section 135 of the Companies Act, 2013, in accordance with the Rules, but shall **not** include the following, namely:-

- (i) Activities undertaken in pursuance of normal course of business of the company:
Provided that any company engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that -
 - a. such research and development activities shall be carried out in collaboration with any of the institutes or organizations mentioned in item (ix) of Schedule VII to the Act;
 - b. details of such activity shall be disclosed separately in the Annual report on CSR included in the Board's Report;
- (ii) any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
- (iii) Contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- (iv) Activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
- (v) Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- (vi) Activities carried out for fulfilment of any other statutory obligations under any law in force in India;

**ANNUAL ACTION PLAN (AAP) OF EASEBUZZ PRIVATE LIMITED (THE COMPANY) FOR THE
FINANCIAL YEAR 2021-22, PURSUANT TO THE CSR POLICY OF THE COMPANY:**

1. CSR Philosophy:

The Corporate Social Responsibility (CSR) philosophy of the Company is to make meaningful and measurable contributions in the lives of socially, economically, financially and physically excluded, disadvantaged and challenged communities of the country through an integrated approach of development that focuses on creating opportunities for enhancing livelihood opportunities, improving quality of education and skills development, creating awareness amongst public at large on topics of financial literacy, health and hygiene, promoting environmental sustainability, and supporting health and sanitation initiatives which may be implemented either directly by itself or through or through any other Non-Government Organizations or Trust, as set out in the Annual Action Plan (AAP), approved by the Board of Directors (the Board) of the Company from time to time.

2. Objectives:

The Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (the Rules) which was notified on January 22, 2021 has emphasized the need for formulation of a framework which would enable the Board to exercise requisite oversight on the manner in which CSR Project(s) / Program(s) are proposed to be undertaken and administered by the Company.

Towards this, the Rules have stipulated formulation and adoption of the AAP, to be reviewed and approved by the Board, pursuant to the recommendation of the CSR Committee, which inter alia includes details relating to the CSR Project(s) / Program(s) to be undertaken by the Company during FY 2021-22, manner of its execution, modalities of fund utilization, monitoring end use of CSR funds, review and reporting mechanism, disclosures in the Annual Report, etc., set out hereinafter.

3. Formulation of AAP:

- a. The formulation of the AAP in respect of the CSR Project(s) / Program(s) proposed to be undertaken / supported by the Company during the FY 2021-22, shall be based on the recommendation of the Management of the Company;
- b. The recommendation of the Management of the Company as set out in the draft AAP shall

be placed for review of the CSR Committee;

- c. The Board, whilst reviewing the recommendations of the CSR Committee, shall be within its rights to make appropriate recommendations to the AAP, as deemed appropriate, and the revised AAP shall be approved, in terms of the extant CSR Norms.
- d. Pertinent details of the AAP, so approved by the Board of the Company shall be hosted on the website of the Company, in accordance with the extant CSR Norms.

4. Implementation Methodology:

- a. The Company shall undertake the CSR activities through Non-Government Organizations (NGO) in accordance with the extant CSR Norms.

For FY 2021-22, Company shall undertake its CSR Activities through Akshaya Patra, NGO. Profile and proposal of Akshaya Patra NGO is enclosed as Annexure A.

- b. The CSR Committee shall review the recommendations made by the Company, with regards to the CSR Project(s) / Program(s) proposed to be undertaken / supported by the NGO(s), under this AAP.

The CSR Committee may consider and approve the amendments / additions proposed to the CSR Project(s) / Program(s) , which forms part of this AAP, as recommended by the Company and recommend the same for the approval of the Board.

- c. The Company may consider and approve the ongoing CSR Project(s) / Program(s) i.e. to be implemented over a period not exceeding 4 years, including the year of its implementation and the means of funding the same, on a case-to-case basis, in line with the extant CSR norms.
- d. All the CSR Project(s) / Program(s) stated in this clause shall be considered as have been undertaken / supported by the Company, subject to its review and approval by the CSR Committee and the Board and its incorporation in the AAP

5. CSR Projects / Programs:

The Company will undertake / support only those CSR Project(s) / Program(s) which are listed in Schedule VII of the Companies Act, 2013 and such CSR Project(s) / Program(s) shall be implemented in the manner as set out in the CSR Policy of the Company, as approved by the Board, from time to time.

The CSR Project(s) / Program(s) which are proposed to be undertaken by the Company, during the FY 2021-22, are as under:

CSR Project(s) / Program(s) to be undertaken through Akshaya Patra NGO:

Eradicating hunger, poverty and malnutrition, promoting health care: (Clause (i) of Schedule VII to the Companies Act, 2013)

Company will be supporting Mid-Day Meals for children studying in govt. schools through contribution to Akshaya Patra NGO

The Board has allocated an amount of Rs. 6.20 Lacs i.e. 2% of the average net profit of last three Financial Years calculated as per Section 198 of the Companies Act, 2013 for contribution to the aforementioned project during FY 2021-22.

6. CSR Spends:

The Company endeavours to spend the entire CSR Budget of Rs.6.20 Lacs so allocated for the CSR Project(s) / CSR Program(s) for the FY 2021-22 as stated above pursuant to the CSR Policy and in accordance with the extant CSR Norms.

7. Review and Authority:

On the recommendation of the CSR Committee, the Board reserves the right to amend by addition or deletion of any CSR Project(s) / Programs and any provision of the AAP, in furtherance of achieving the stated objectives of the Company, from a CSR perspective.

This AAP has been reviewed and approved by the CSR Committee on January 25, 2022 and thereafter by the Board on January 25, 2022 shall be valid from April 01, 2021 to March 31, 2022 (both days inclusive).

However, the provisions of this AAP shall continue to remain in force and binding with regards to all the ongoing and standalone projects supported by the Company through Akshaya Patra NGO in terms of the approval granted by the Board pursuant to the CSR Policy of the Company.
