

ROBOSOFT TECHNOLOGIES PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Robosoft Technologies Private Limited (hereby referred to as “Company”) intends to make a positive difference to society and contribute its share towards the social cause of betterment of society and area in which companies operates.

We, at Robosoft Technologies Private Limited believe that creation of large societal capital is as important as wealth creation for our shareholders. As a responsible human organization, we are committed towards the above objective and are keen on developing a sustainable society. This policy acts as a guide towards our social commitment going forward, in accordance with Section 135 of the Companies Act 2013 (referred to as the CA2013) on CSR the CSR rules (hereby referred to as the Rules) notified by the Ministry of Corporate Affairs, Government of India in 2014. The Policy shall apply to all CSR projects/programmes undertaken by the Company in India as per Schedule VII of the Act as amended from time to time

1. **"Board"** means the Board of Directors of the Company.
2. **"CSR Activities"** means such programs and projects as may be approved by the Board as per the terms as conditions of CSR Policy of the company
3. **"CSR Committee"** means a committee constituted by the Board as per the provision of the Section 135 of the companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014 ("**CSR Rules**") as amended from time to time.
4. **"CSR Expenditure"** means the amount recommended by the CSR Committee to be incurred on the CSR Activities in India in terms of the provisions of the Companies Act 2013 and the CSR Rules as approved by the Board from time to time.
5. **"CSR Policy"** means a statement containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan;
6. **"Director"** means a member of the Board of the Company.

IV. IMPLEMENTATION OF THE CSR ACTIVITY

A. Role of the Board

The Board shall ensure that all CSR activities shall be carried out in accordance with

- a) the CSR Policy of the company
- b) the annual action plan recommended by the CSR Committee
- c) The Board shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- d) In case of ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- e) The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.

B. Role of the committee

The CSR committee shall comprise of

1. Ronald Raymond Machan - Chairman of the committee
2. Gaku Shimaoka - Member
3. Tatsunori Okumura - Member
4. Akihide Tonegawa - Member and
5. Alope Shripati Hegde - Member

Company Secretary of the company shall act as a Secretary of the committee.

The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely: -

- a. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- b. the manner of execution of CSR projects or programmes
- c. the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- d. monitoring and reporting mechanism for the projects or programmes; and

- e. details of need and impact assessment, if any, for the projects undertaken by the company
- f. execution of CSR projects as approved by the Board

The Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

The CSR committee may constitute a team for the purposes of implementation of the CSR Activities approved by the Board from time to time.

C. Implementation Method

Direct Method

The Company may undertake the CSR activities directly through its own resources. The CSR committee may constitute a team of employees to conduct CSR activities its own.

Indirect Method

The company may can take the CSR Activities through any “Implementation Entity”, as defined below, subject to following conditions.

- i. Company established under section 8 of Indian Companies Act 2013 (“Non-Profit Organisation”) and having an established track record of at least three years in undertaking similar activities.
- ii. Trust, or Society registered under section 12-A and having an exemption under 80-G of the Income Tax Act 1961 and having an established track record of at least three years in undertaking similar activities.
- iii. Non-Profit Organisation or Trust, or Society, being established by (Indian) Central Government or (Indian) State Government.
- iv. Any entity established under an act of (Indian) Parliament or a (Indian) State Legislature.

Further company shall ensure that as “Implementation Entity” shall registered with Ministry of Corporate affairs and shall have obtained a unique CSR Registration Number.

1. The Company shall conduct a due diligence prior to selection of an entity as its Implementation Entity and satisfy itself that Implementation Entity is eligible for carry out the CSR activity as per the provisions of the act.
2. In case of failure to ensure the minimum CSR Expenditure i.e. 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years, detailed reasons for the same should be submitted by the CSR Committee to the Board. The Board shall duly include such explanation in their annual board of directors' report.

VII. CSR ACTIVITIES

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 recognised 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; and
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 Defence 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
14. Any other project as may be specified under Schedule VII of the Companies Act, 2013, from time to time.

Reporting

1. The committee shall submit the report to the board each quarter containing the details of the CSR activities conducted by the company.
2. The board of Directors report shall contain the annual report on CSR activities of the company as per the provisions of the companies act 2013.

Display of CSR

The Board of Directors of the Company shall disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.

Amendments to the policy

The Board of Directors on its own and/or on the recommendation of CSR committee can amend its policy as and when required deemed fit. Any or all provisions of CSR Policy would be subject to the provisions of the Companies Act, 2013 and Rules framed thereunder.