



CORPORATE SOCIAL RESPONSIBILITY POLICY ("CSR Policy")

Approved by: Board of Directors
on January 14, 2021.

A. Preamble:

Globocom Infotech Private Limited ("the Company") has adopted the Policy ("**CSR Policy**") on Corporate Social Responsibility (CSR), applicable to the Company and its subsidiaries.

The Company strives to be a socially responsible company and strongly believes in development which is beneficial for the society at large. The Company shall carry out CSR activities where it has its major business presence.

B. Policy Objectives:

The objective of this Policy is to set out guiding principles for carrying out CSR activities and also to set up process of implementation and monitoring of CSR activities to be undertaken by the Company.

C. Implementation:

All CSR projects/activities will be over and above the normal course of the Company's business and will be implemented by the Company executives or group entities or external implementing agencies or specialized NGOs as permissible under the applicable provisions of the Companies Act.

D. Governance:

CSR implementation shall be periodically reviewed and monitored by the CSR Committee of the Board constituted as per the requirements of Section 135 of the Companies Act, 2013. The CSR committee shall hold at least one CSR Committee meeting in a financial year.

The CSR Committee of the Board shall:

1. Formulate and recommend the CSR Policy to the Board.
2. Finalise and approve the amount of expenditure to be incurred on CSR activities and for this purpose approve the annual plans and budgets;
3. Ensure that the Company annually spends the requisite amount towards CSR activities as may be prescribed under the CSR Policy of the Company or as may be stipulated under any legislation;
4. Ensure that the activities as are included in CSR Policy are undertaken by the company;
5. Any other matter as the CSR Committee may deem appropriate after the approval of the Board of Directors or as may be directed by the Board from time to time.

The Board shall:

1. Approve the CSR Policy based on the recommendation of the CSR Committee;
2. Approve the CSR activities and annual CSR plan based on the recommendation of the CSR Committee; and

3. Periodically review the CSR Policy and CSR activities.

E. CSR focus areas:

The Company may undertake the following activities under the ambit of CSR:

1. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and making available safe drinking water;
2. Promoting education, hosting events, performances in pure arts including special education and employment enhancing vocational skills especially among children, women and the differently abled and livelihood enhancement projects;
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; day care centres and such other facilities and measures for reducing inequalities faced by socially and economically backward groups;
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna and conservation of natural resources;
5. Protection of national heritage, art and culture; setting up public libraries; promotion and development of traditional arts and handicrafts;
6. Contributions 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 Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
7. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
8. Rural development projects; The Company may contribute to other areas of interest as permitted under Schedule VII of the Companies Act and update the above list as per Section 135 and Schedule VII of the Companies Act.

F. Budget:

A specific budget shall be allocated for CSR activities alongwith the projected plan on an annual basis. The amount & the projected plan shall be approved by the Board on the recommendation of the CSR Committee. Any surplus arising and/or additional revenue generated out of CSR Activities undertaken by the Company shall not form part of the business profit of the Company and same shall be spent only for undertaking CSR activities.

G. Monitoring:

The Company will set up a monitoring process for implementation of the CSR projects/activities and reporting to the CSR Committee in compliance with the requirements of Section 135 of the Companies Act.

H. Reporting Framework:

The Company shall lay down a reporting framework for each program / project being undertaken towards CSR activities laying down specifically the sector / location in which the activity has been undertaken, the description of the activities being undertaken, the amount allocated towards the same, the amount spent towards the CSR activities and such other particulars as may be required from time to time depending upon the nature of the CSR activity.