



## Corporate Social Responsibility (CSR) Policy

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### 1. Preamble

Corporate Social Responsibility is a company's commitment to operate in an economically, socially, and environmentally sustainable manner while recognizing the interests of its stakeholders. This commitment is beyond statutory requirements. Corporate Social Responsibility is, therefore, closely linked with the practice of Sustainable Development. Corporate Social Responsibility extends beyond philanthropic activities and reaches out to the integration of social and business goals. These activities need to be seen as those which would, in the long term, help secure a sustainable competitive advantage.

### 2. Background

Xtranet Technologies Limited, (hereinafter described as “XTL” or “the Company”) has, since its inception, seen itself as a responsible corporate citizen ready to give back to society and has been contributing to activities, which promote various social and charitable objectives.

Over the years, the Company has been contributing/donating towards various charitable activities such as sponsoring a number of medical camps, blood donation camps, sporting activities, community health initiatives, and animal welfare in the region.

### 3. Corporate Social Responsibility (“CSR”) Committee

The CSR Committee of the Company is authorized to do any of the following acts without limitation:

- a) formulate and recommend to the Board, a Corporate Social Responsibility Policy (“**the Policy**”) which shall indicate the activities/projects to be undertaken by the Company (“**the Projects**”) inter alia including the activities specified in Schedule VII of the Companies Act, 2013 (“**the Act**”) as amended from time to time and other Rules and Notifications made thereunder.
- b) recommend the amount of expenditure as per the Act to be incurred on the activities referred to in clause (a).
- c) Institute and implement a transparent monitoring mechanism towards monitoring the Projects and other programs/activities undertaken by the Company.
- d) monitor the Policy from time to time

This Corporate Social Responsibility Policy has been formulated and recommended by the CSR Committee of the Company pursuant to the provisions of Section 135(3)(a) read with Schedule VII of the Companies Act, 2013 and the Rules made there under.

### 4. CSR Policy: Scope and Objectives

In order to carry out the Projects and to streamline and provide more focus and direction to the activities undertaken by the Company in its sphere, it is decided to formulate the Policy.

Further, Section 135 of the Act and the Rules made thereunder (“the Rules”) have also laid down

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guidelines for CSR Programs for the Companies falling into the criteria of mandatory provision for CSR.

This Policy is formulated in line with the requirements of the Act and shall be applicable on a uniform basis.

## **5. Areas of activities to be undertaken**

The Company shall be undertaking one or more of the following activities as prescribed in the Act and Rules as modified from time to time:

- 5.1 Eradicating hunger, poverty, and malnutrition, promoting health care including preventive health care and sanitation, and making available safe drinking water.
- 5.2 Promoting education, including special education and employment enhancing vocation skills, especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
- 5.3 Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, daycare centers, and such other facilities for senior citizens, and measures for reducing inequalities faced by socially and economically backward groups.
- 5.4 Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, the conservation of natural resources, and maintaining the quality of soil, air, and water.
- 5.5 Protection of national heritage, art, and culture including restoration of buildings and sites of historical importance and works of art and setting up of public libraries.
- 5.6 Measures for the benefit of armed forces veterans, war widows, and their dependents.
- 5.7 Rural Development Projects.
- 5.8 Such other matters as may be prescribed from time to time by the Government of India.

## **6. Activities not to be taken up under CSR Programme**

- 6.1 The CSR projects or programs or activities that benefit only the employees of the company and/or their respective families.
- 6.2 Contribution of any amount directly or indirectly to any political party under section 182 of the Act.

## **7. Mode of Execution**

The activities will be executed directly or through registered and accredited trusts, a company incorporated under Section 8 of the Act, Society or NGO, or in collaboration with other companies and such other organizations as may be prescribed under the Act from time to time.

## **8. Methodology**

The planning for CSR shall start with the identification of the activities/projects to be undertaken. CSR projects/activities shall be undertaken in the periphery where the Company carries out its activities as far as possible. Where this is not possible, the Company may choose to locate CSR

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projects anywhere in the country.

The plan under CSR shall be integrated with the social and environmental concerns related to the business of the Company.

The CSR Plan shall match with the long-term Business Plan. CSR plans will be in line with clause 5 above and broadly shall specify:

- a) Activities to be undertaken
- b) Budgets allocated
- c) Timelines prescribed
- d) Responsibilities and authorities defined
- e) Monitoring mechanism
- f) Major results expected

**9. Types of Expenditure to be considered as related to CSR activities**

Salaries paid to regular CSR staff and volunteers (in proportion to time spent on CSR activities) can be factored into CSR project cost as part of CSR expenditure.

**10. CSR Monitoring and Reporting Mechanism**

The CSR Committee shall monitor the amount of expenditure as approved by the Board of the Company on a quarterly basis and make report to the Board of Directors on half yearly basis. Apart from the above, the Directors' Report of the Company shall include an annual report on CSR containing the particulars in the prescribed format.

**11. Display of the CSR Policy in the website of the Company**

This policy shall be placed in the website of the Company, i.e., <https://xtranetindia.com/>.

**12. Amendments**

The Board of Directors may revise/modify/amend this policy based on recommendations of the CSR Committee to align with government notifications or organizational priorities.

**Date: April 1, 2024**

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