

Corporate Social Responsibility Policy of FIDEL SOFTECH LIMITED

At Fidel Softech Limited, we are committed to the 'Empowering India' vision by make the youth future ready by focusing on skills development, support to innovation vision of creating a more inclusive and greener India. We never lose sight of our responsibility to the environment and society. Our commitments towards Corporate Social Responsibility include but not limited to, promotion of education and healthcare, energy and climate change, and betterment of the society through respect for universal human rights and the environment, acting with integrity and transparency.

1. Overview

Fidel has always believed in giving back to the society and is committed to continue its efforts in future. The Companies Act, 2013 has brought framework and modalities for carrying out CSR activities under the legal purview. All the CSR activities undertaken by the Company would be in compliance with Section 135 and Schedule VII of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as "the CSR Rules")

2. CSR Committee

Corporate Social Responsibility Committee of the Company would effectively monitor CSR activities of the Company.

To effectively implement the objectives of the Company with respect to CSR, the Committee is vested with the following functions and powers:

- a. Formulate, monitor and review periodically, CSR Policy and recommend the same to the Board of Directors of the Company for approval;
- b. Formulate, monitor and review Annual Action plan for recommend the same to the Board of Directors of the Company for approval;
- c. Approve to undertake CSR activities, if necessary, in collaboration other Companies/firms/NGOs etc., and to separately report the same in line with the CSR Rules;
- d. Review and monitor spending of the allocated CSR amount on the CSR activities in accordance with the Act and the CSR Rules;
- e. Submit the Reports to the Board in respect of the CSR activities undertaken by the Company.

3. CSR Spend

The Companies Act, 2013 prescribes that the companies which meet the criteria specified U/s. Sec. 135 shall allocate certain portion of its annual net profits (calculated as per Sec. 198) during the three immediately preceding financial years to be spent on CSR Activities that fall under the categories specified under Schedule VII of the Act.

CSR Expenditure Net profit for the purpose of allocation towards CSR means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

Whilst the company will continue to primarily support activities in Schedule VII to the Companies Act, 2013 listed below, it will also simultaneously focus its activities in the areas of education, skills development and healthcare.

Schedule VII:

- i. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the “Swachh Bharat Kosh” set-up by the Central Government for promotion of sanitation and making available safe drinking water.
- ii. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and differently abled and livelihood enhancement projects.
- iii. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- iv. Ensuring environmental sustainability, ecological balance, and 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” setup by the Central Government for rejuvenation of river Ganga.
- v. 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 arts and handicrafts.
- vi. Measures for the benefit of Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows.
- vii. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.
- viii. Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) 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.
- ix. (a) 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

(b) 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)”.

- x. Rural development projects.
- xi. Slum area development (‘Slum Area’ shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force).
- xii. Disaster management, including relief, rehabilitation and reconstruction activities. Contribution made to State Disaster Management Authorities to combat COVID-19 or other Pandemics of similar nature.

4. Collaboration

It is expressly allowed under the CSR Rules that the Company may collaborate with any other Company or association formed in this regard subject to approval by CSR Committee, to implement CSR activities and the same shall form a part of the Annual CSR Plan.

An Internal Working and Monitoring Team comprising of employees of the Company would be set up to ensure effective implementation and monitoring of the projects approved by the CSR Committee from time to time.

5. Reporting

Reporting by Internal Working and Monitoring Team the Internal Working and Monitoring Team will report / give feedback to the CSR Committee for all CSR projects undertaken. The Internal Working and Monitoring Team shall submit reports to the CSR Committee of the Company on the progress of the various projects approved by the Committee and entrusted to the Group for implementation and monitoring.

6. Policy review and future amendment

The administration of the CSR Policy of the Company and the execution of identified CSR projects, programs and activities under it shall be carried out under the control and overall supervision of an internal monitoring group formed for this purpose. At the time of formation of this policy, the internal monitoring group shall be nominated by the Managing Director of the Company

Further, the Board of Directors may revise/ amend the CSR Policy based on the recommendations of the CSR committee or to bring the same in line with the guidelines or amendments issued from time to time by Government on the subject.

For **Fidel Softech Limited**

Managing Director

Date Nov 2, 2022

Place - Pune