

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY
OF
ITQ TECHNOLOGIES PRIVATE LIMITED
(formerly known as Interglobe Technology Quotient Private Limited)

I. Preamble

This CSR Policy is formulated and adopted in compliance with the provisions of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014 and has been approved by the Board of Directors of ITQ Technologies Private Limited *(formerly known as Interglobe Technology Quotient Private Limited)*.

ITQ has been inspired by the vision to serve a larger national purpose. ITQ identifies its core values as: highest standards of integrity, respecting its customers' interest, and future - mindedness. ITQ is committed to being a good corporate citizen and build a sustainable business for its current and future stakeholders. A conscious strategy will be followed to design and implement CSR programs under the CSR Policy to create shared values with its stakeholders.

ITQ's vision is to contribute to the social and economic development of communities and to participate in ensuring education, strengthening livelihood, skill development, conserving environment and promoting national heritage and culture.

II. Definitions

- (a) "Act" means the Companies Act, 2013 and Rules framed thereunder;
- (b) The words "Company" or "ITQ" wherever occur in the policy shall mean "ITQ Technologies Private Limited *(formerly known as Interglobe Technology Quotient Private Limited)*".
- (c) "Corporate Social Responsibility (CSR)" means and includes but is not limited to:-
 - (i) Projects or programs relating to activities specified in Schedule VII to the Act; or
 - (ii) Projects or programs relating to activities undertaken by the Board of Directors of the Company (Board) in pursuance of recommendations of the CSR Committee of the Board as per declared CSR Policy of the Company subject to the condition that such policy will cover subjects enumerated in Schedule VII of the Act.
- (d) "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act.
- (e) "CSR Policy" or "Policy" means and refers to this Corporate Social Responsibility Policy of the Company

Words and expressions used and not defined in this Policy but defined under the Act or the Rules shall have the same meanings respectively assigned to them in the Act and the Rules.

III. Scope of CSR Activities:

The CSR initiatives of the Company are identified in consultation with the management, social experts, community and other stakeholders. The identified focus areas for the Company's CSR initiatives are:

1. Promoting Education, including special education, vocational training;
2. Livelihood enhancement projects including farm based, non-farm based and enterprises for women and marginalized sections;
3. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries, promotional and development of traditional arts and handicrafts;
4. Ensuring Environmental sustainability, ecological balance, agro forestry, conservation of natural resources, animal welfare, waste management;
5. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers and other such facilities for reducing inequalities faced by socially and economically backward groups;
6. Measures for the benefit of armed forces veterans, war widows and their dependents;
7. To provide training to promote rural sports, nationally recognized sports, and Para-Olympic sports and Olympic sports;
8. To contribute to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
9. To provide contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
10. To contribute in rural development projects and slum area development;
11. Eradicating hunger, poverty, malnutrition, promoting sanitation and clean drinking water.

In addition to above, the Company may take up any other CSR activities as notified in Schedule VII of the Companies Act, 2013 (as amended from time to time)

IV. CSR Expenditure or Budget

The Company shall spend in every financial year, at least two percent of the average net profits of the Company made during the three immediately preceding financial years on CSR projects in accordance with the policy.

Surplus, if any, arising out of the CSR projects, programmes or activities shall not form a part of the business profits of the Company and will be ploughed back into the CSR activities. Surplus, if any, out of CSR activity is prohibited to form part of business profits and has to be used back for CSR purpose only or transfer such surplus to fund specified in Schedule VII within 6 months from end of financial year.

Any amount spent by the Company in any year in excess of its statutory obligation for CSR, may be set off against the CSR obligation of the Company for subsequent three financial years.

V. Implementation process

V.1 Execution

The Company may carry out CSR activity either itself or through any other companies registered under Section 8 of the Companies Act, 2013, registered public trust, registered society, registered under section 12A and 80G of the Income Tax Act, 1961, etc. having the required expertise and established track record of three years or any such entity established by the Central Government or State Government. Provided that any such entity through which the Company undertakes to carry out CSR Activities, shall possess the unique CSR Registration Number.

V.2 Project Selection

All CSR projects taken up by ITQ must follow the below mentioned due process to ensure that the projects lead to sustainable impact;

- Due diligence of the implementation partner
- Alignment of the project objectives with the Scope of ITQ's CSR activities
- Coherent Project Implementation strategy and schedule
- Appropriate Monitoring and Review Mechanisms
- Regular reporting schedule
- Duly checked budget

The company will get these processes done either directly or through implementing agency.

V.3 Approval Process

The CSR Committee shall formulate and recommend to the Board, an annual plan of all CSR activities to be taken up by the company in line with CSR Policy and it shall include:

- (a) the list of CSR projects or programmes;
- (b) the manner of execution of such 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;

The Annual Action plan shall form part of the CSR Policy and it will be updated/ altered from time to time with the approval of the Board and as per the recommendation of the CSR Committee, based on the reasonable justification.

VI. Compliance, monitoring and reporting:

Monitoring and evaluation is an essential part of any activity that is undertaken by an organization and that will also be followed for programs undertaken under the CSR Policy. Programs under the CSR Policy will be continuously monitored on parameters agreed upon in the annual plan by the CSR Committee of the Company.

Compliance will be reported to stakeholders through the Company's Annual Report. CSR Committee of the Company shall ensure that programs under the CSR Policy comprise essentially of CSR activities undertaken within India.

The CSR Policy will be reviewed, unless earlier required due to change in laws, periodically by the Board of ITQ and updated if required, to ensure it captures the relevant current interest of the stakeholders.

VII. Miscellaneous

Notwithstanding anything contained in this Policy, no action pertaining to CSR activities shall be taken in contravention / deviation to the provisions of Section 135 of the Companies Act, 2013 and of the Companies (Corporate Social Responsibility Policy) Rules, 2014 and applicable Government Guidelines, as amended from time to time.

The Board of Directors, on its own and/or on the recommendation of CSR committee, can amend any of the provisions of this policy and as and when required deemed fit. Any or all provisions of CSR Policy would be subjected to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.
