

Corporate Social Responsibility (CSR) Policy

1. Introduction

This Corporate Social Responsibility (CSR) Policy outlines the guiding principles, objectives, governance, and implementation framework adopted by Team Computers Private Limited ("TCPL" or "the Company") in alignment with Section 135 of the Companies Act, 2013, the Companies (CSR Policy) Rules, 2014, Schedule VII of the Act, and all relevant amendments, rules, and notifications issued by the Ministry of Corporate Affairs (MCA).

TCPL is committed to contributing to the social, environmental, and economic development of the community. The Company believes in the philosophy of "Sewabhav" and strives to deliver long-term value through inclusive growth and sustainable development. This policy is applicable across all CSR activities undertaken by TCPL, either directly or through eligible implementation agencies.

2. Vision & Mission

Vision:

To build a compassionate, inclusive, and sustainable society where technology and service empower individuals, support animal welfare, and protect the environment.

Mission:

To catalyze social transformation and sustainability through innovative, technology-enabled, and community-driven CSR initiatives aligned with national priorities and the spirit of service (Sewabhav).

3. Governance Structure

3.1 CSR Committee Composition

The Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR shall be appointed by the Board of Directors of the Company which must consist of at least two or more Directors. The CSR Committee of the Company shall be comprised of the following Directors:

Sr. No.	Name of Member	Nature of Directorship	Role in CSR Committee
1	Ranjan Chopra	Director	Chairperson
2	Prakash Pal	Director	Member
3	Jatin Sawhney	Director	Member

3.2. Roles & Responsibilities of CSR Committee

- Formulate and recommend CSR Policy and Annual Action Plans as per rules.
- Recommend budget allocation for CSR activities.
- Identify, evaluate, and approve CSR programs and projects.
- Monitor the progress of ongoing CSR initiatives.

- Ensure compliance, documentation, and disclosures as per applicable rules.
- Review impact assessment reports and integrate learnings.
- Formulate annual action plan in pursuance of the CSR policy in accordance with the applicable law, and inclusive of the following items:

3.3 Meetings

- Minimum of two meetings per financial year.
- Quorum shall be two members or one-third of total strength, whichever is higher.
- Proceedings shall be recorded and signed by the Chairperson.
- External stakeholders may be invited as necessary

4. CSR Strategy & Implementation Framework

4.1 Mode of Implementation

CSR initiatives shall be implemented:

- Directly by TCPL; or
- Through eligible implementation agencies registered with MCA and holding valid CSR Registration Number, such as:
 - Section 8 Companies, Trusts, or Societies registered under Section 12A and 80G of the Income Tax Act.
 - Government-established entities.
 - Organizations with a track record of at least three years in similar activities.
 - Statutory bodies established under an Act of Parliament or State Legislature.

4.2 Due Diligence & Engagement

- Due diligence shall be conducted to verify credentials and eligibility of implementation agencies.
- TCPL may collaborate with group companies or other corporates to undertake joint CSR projects.
- International organizations may be engaged for design, monitoring, evaluation, or capacity building.

4.3 Annual Action Plan

The CSR Committee shall recommend to the Board an annual action plan, which shall include:

- Approved CSR projects with alignment to Schedule VII.
- Manner and schedule of execution.
- Modalities for fund utilization.
- Monitoring and reporting mechanisms.
- Details of need assessment and impact evaluation.

5. CSR Focus Areas

TCPL shall undertake CSR projects in the following domains as per Schedule VII of the Companies Act 2013:

- Education, skill development, and digital inclusion.
- Preventive healthcare, nutrition, menstrual hygiene, sanitation, and safe drinking water.
- Livelihood enhancement for farmers, SHGs, and rural entrepreneurs.
- Environmental sustainability, renewable energy, waste management, afforestation, and biodiversity.
- Animal welfare, including rescue, rehabilitation, and shelters.
- Women empowerment and support for marginalized and vulnerable sections.
- Disaster relief, rehabilitation, and emergency response.
- Promotion of traditional arts and cultural heritage.
- Contributions to PM CARES Fund, CM Relief Fund, or other notified government funds.
- Any other activity falling within the scope of Schedule VII of the Companies Act, 2013 which will enable the company to achieve its CSR Objectives.

6. CSR Budget & Expenditure

- At least 2% of the average net profits of the Company during the three immediately preceding financial years shall be spent on CSR.
- Unspent amounts on ongoing projects shall be transferred to the Unspent CSR Account within 30 days of the end of the financial year and utilized within 3 years.
- Unspent non-ongoing amounts shall be transferred to a specified fund under Schedule VII within 6 months.
- Surplus arising out of CSR projects shall be reinvested in CSR.
- Administrative overheads shall not exceed 5% of total CSR expenditure.

7. Monitoring, Evaluation & Reporting

7.1 Monitoring Mechanism

- Regular reviews by the CSR Committee.
- Defined metrics for outputs, outcomes, and impact.
- Field visits, stakeholder consultations, and third-party audits.

7.2 Impact Assessment

- Impact assessment is mandatory for CSR projects with outlays of ₹1 crore or more, to be conducted by independent agencies.
- Reports shall be annexed to the Board's Annual Report.

7.3 Reporting & Disclosures

- CSR disclosures in the Board's Report as per Rule 8 of CSR Rules.
- Filing of CSR-2 with the Registrar of Companies annually.
- Policy and programs shall be hosted on the Company's website.

8. Exclusions from CSR

8.1 CSR expenditure shall not include:

- Activities undertaken in the normal course of business.
- Projects outside India (except training of Indian sportspersons).
- Contributions to political parties.
- Activities benefiting only employees of the Company.
- Activities undertaken for marketing or brand-building purposes.
- Statutory obligations under any prevailing laws.
- Any other expenditure excluded as per Companies Act, 2013.

9. Policy Review & Amendments

- This policy shall be reviewed at least annually and updated to comply with legal and strategic requirements.
- Amendments shall be approved by the Board based on CSR Committee recommendations.
- The policy shall be disclosed on the Company's website and included in relevant statutory filings.

10. Communication & Awareness

- Dissemination of CSR Policy and initiatives to all stakeholders.
- Employee engagement and volunteering shall be encouraged to build a culture of social responsibility.

**Approved by the Board of Directors of
Team Computers Private Limited**