

# **SIX DEE NETAD SOLUTIONS PRIVATE LIMITED**

**Regd. Off.:** 1503, Devika Tower 6, Nehru Place, New Delhi - 110019

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## **Corporate Social Responsibility (CSR) Policy of Six Dee Netad Solutions Pvt Ltd**

## Table of Contents

Sr. No	Content	Page No.
A	Introduction	3
1	CSR Objectives	4
2	Scope of CSR	4
3	Constitution of CSR Committee	4
4	Role and Responsibilities of the Committee	4-5
5	CSR Initiatives	5
6	CSR Activities 6.1 Implementation Approach 6.2 Monitoring of CSR Activities 6.3 Reporting of CSR Activities	5-8
7	Amendment in CSR Policy	8
8	Funding, Allocation and Tax Treatment of CSR expenditure	8

## **Introduction:**

**'Six Dee Netad Solutions Private Limited'** is a subsidiary company of M/s. Six Dee Telecom Solutions Private Limited, having its registered office at 1503, Devika Tower 6, Nehru Place, New Delhi - 110019. The wide range of the Company's activities includes computer and information technology related services.

**Corporate Social Responsibility (CSR)** refers to the transparent business practices that are based on ethical values, compliance with legal requirements, and respect for people, communities, and the environment.

A Policy to ensure that Six Dee Netad Solutions Private Limited (hereinafter called "the Company") complies with Section 135 of Companies Act 2013 ("the Act") read with schedule VII and Companies (Corporate Social Responsibility Policy) Rules, 2014 (jointly hereinafter refer as "CSR Regulations") as amended. The "CSR Policy" encompasses the company's philosophy for delineating its responsibility as a responsible corporate citizen.

This Policy lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large. This policy shall apply to all CSR initiatives and activities taken up by the company for the economic and social development of the society.

## **Effective Date**

This Policy is effective from April 01, 2019.

## **1. CSR Objectives:**

Corporate citizenship forms an integral part of the Company's vision of itself as a business enterprise. We also endeavor to align our efforts with the locally relevant topics and issues thus creating a greater positive impact on the society.

Our efforts are directed towards scaling up of our corporate development and to support people to help themselves in the long term. In addition to our focus areas, we also continue to support neighborhoods around our locations and thus contribute towards local development.

It is both our objective and duty as a corporate citizen of the society. The aim is to integrate the company into society and to create and support meaningful and innovative activities.

## **2. Scope of CSR:**

- i) Vision of Corporate Social Responsibility;
- ii) Key focuses areas of CSR Activities;
- iii) Framework for implementation strategy of various CSR Activities;
- iv) Methodology of measuring and reporting outcomes and impact.

## **3. Constitution of CSR Committee:**

For effectively carrying out the above-mentioned objectives, the board of directors in their meeting held on 07/09/2019 has constituted the "Corporate Social Responsibility Committee" (the "CSR Committee") in accordance with Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time, to ensure that the purpose of this Policy is being achieved.

The composition of the CSR committee of the Board is as under:

1. Mr. Amit Relan (Director) – Chairman & Member

2. Mr. Manish Arora (Director) – Member

For the relevant financial year, the Board's report shall disclose the composition of the CSR Committee.

#### **4. Role and Responsibilities of the Committee:**

In terms of section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, the following are key responsibilities of the CSR Committee:

- a) To draft CSR policy and recommend the same to the Board for its approval;
- b) To review and recommend any new CSR initiatives to be taken up by the company;
- c) To review the progress of CSR projects already undertaken by the company, if any, and the utilization of budgets for each such projects;
- d) To review and recommend the CSR report to be included in the board's report;
- e) To review and recommend any amendments to be made in the CSR policy of the Company;
- f) To carry such other functions as may be delegated to it by the board relating to CSR activities of the company.

#### **5. CSR Initiatives:**

In line with Schedule VII of the Act and the CSR Rules, the Company shall undertake CSR activities include in its Annual CSR Plan, as recommended by the CSR Committee at the beginning of each year. The committee is authorized to approve any modification to the existing Annual CSR Plan or to propose any new program during the financial year under review.

## 6. CSR Activities:

The CSR activities will be undertaken by the company is aligned to the provisions of Schedule VII of the Companies Act, 2013 (the "Act"). The CSR Committee is empowered to undertake activities provided within the ambit of Schedule VII read with Companies (Corporate Social Responsibility Policy) Rules, 2014.

The purpose for which amount can be utilized is defined under schedule VII of the Companies Act, 2013 and summarized here below:

- (i) promoting & contributing in healthcare services, contribution in development and research activities in Medicines and sanitation including contribution to the Swachh Bharat Kosh set up by the Central Government for the promotion of sanitation and making available safe drinking water and eradicating hunger, poverty and malnutrition;
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the 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, 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 set-up 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 armed forces veterans, war widows and their dependents;

- (vii) training to promote rural sports, nationally recognized sports, Paralympics' sports and Olympic sports;
- (viii) contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development, pandemic, natural calamity and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- (ix) contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) Rural development projects;
- (xi) Slum area development\*.

*(\* Explanation: For the purpose of this item, the term '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) Any other activity as may be specified and notified by the Central Government under Section 135 read with Schedule VII of the Companies Act, 2013 from time to time.

The scope of activities may be expanded from time to time as per the guidelines provided in the Companies Act.

The operations of the Company are spread over entire India. The Company may carry out its CSR activities in any part of India, as may be decided by the CSR Committee from time to time.

## **6.1 Implementation Approach:**

The Company may undertake one or more projects or programs or activities provided in the policy either as its own or through any registered implementation agency i.e.

- (a) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act,

1961 (43 of 1961), established by the company, either singly or along with any other company, or

- (b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- (c) any entity established under an Act of Parliament or a State legislature; or
- (d) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

It shall be the endeavor of the company to build up necessary capabilities to implement the CSR projects on its own in the long run. It can also acquire the services of experts in respective fields by appointing them as consultants in a particular program or project. While engaging a third party agency for implementing a project or program covered in the CSR policy, the CSR Committee shall ensure that they have credible track record in undertaking similar programs or projects as defined under schedule VII of the Companies Act, 2013 (and other Trusts, Foundations and Section 8 companies that may be established by the Company from time to time).

The Company may also make CSR expenditure directly in the form of contribution to the eligible funds like Prime Minister's National Relief Fund notified by the Central Government or any other fund established by the Government of India for the welfare of the public at large.

The Company may build CSR capacities of their own personnel as well as those of their Implementing agencies through Institutions with established track records of three years but such expenditure, including expenditure on administrative overheads shall not exceed five percent of total CSR expenditure of the Company in one financial year.

The Company may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programs in accordance with these rules.



## **6.2 Monitoring of CSR Activities:**

CSR committee of the company will be responsible for the monitoring of various CSR Projects or programs undertaken by the company directly or indirectly. The committee shall ensure that:

- i) The Company undertakes the CSR activities as provided in the CSR policy;
- ii) The projects/ programs are implemented as per the programs approved by the board;
- iii) The budget allocated for each of the project is utilized for the projects as per the approved plans;
- iv) The objective of the project/programs is achieved as per the plans;
- v) The Company shall provide necessary resources and human capital for implementation and the effective monitoring of the CSR projects and programs as may be directed by the CSR Committee.

## **6.3 Reporting of CSR Activities:**

During every financial year, the CSR Committee shall meet at least twice in a year for the purpose of undertaking overview of the CSR activities. The committee shall review and discuss the scope of the activities or programs or projects those were undertaken during the financial year as a part of the company's CSR activities/projects. The Board of Directors of the Company shall from time to time review CSR activities of the Company.

At the end of each financial year, the CSR Committee shall prepare a report of the CSR Program in the prescribed form relating to the financial year and submit to the board for its inclusion in the Board's Report.

## **7. Amendment in CSR Policy:**

Any or all provisions of the CSR Policy would be subject to revision/amendment amendments by the Board of Directors of the company based on the recommendations

of the CSR committee in accordance with the Companies Act, 2013 and rules made there under.

The company reserves its right to modify, cancel, add, or amend any of the provisions of CSR policy stated herein above.

## **8. Funding, Allocation and Tax Treatment of CSR expenditure:**

- a. For achieving its CSR objectives through implementation of meaningful and sustainable CSR programs, the Company will allocate 2% of average of its net profits computed as per section 198 of the Companies Act, for the three immediately preceding financial years made by the Company during “every block of three years” as its “Annual CSR Budget”.
- b. Tax treatment of the CSR spend of the company during every financial year, shall be in accordance with the provisions of the Income Tax Act, 1963 and rules framed there under, as notified by the Central Board of Direct Taxes (CBDT) and as amended from time to time.
- c. In any financial year, if the company fails to spend the required amount as mentioned above, the Board shall, in its report, specify the reasons for not spending the amount and will try to spend it in the subsequent year.

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