



CYGNET.ONE

Corporate Social Responsibility Policy of Cygnet Infotech Private Limited

Cygnet Infotech Private Limited ("Cygnet" or the "Company") has always been a firm believer in the corporate social responsibility movement. We recognise that as a responsible corporate citizen, our growth must be inclusive and must contribute to the sustainable development of the society in which we operate. Pursuant to Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time (together, the "Act"), Cygnet has framed this Corporate Social Responsibility Policy ("Policy") to formalise its approach towards its social responsibility initiatives.

1 OBJECTIVE

At the outset, the following shall be the prima facie objectives of Cygnet:

- To initiate voluntary measures to address economic, social, medical, educational, and environmental concerns.
- To make CSR a key business process for sustainable development.
- To be a good corporate citizen and contribute towards nation building.

2 IMPLEMENTATION PROCESS: IDENTIFICATION OF PROJECTS

Projects are identified by the CSR Committee based on an assessment of community needs and Cygnet's focus areas, and in consultation with implementation partners and, where relevant, the local community. Proposals received are evaluated against the eligible activities set out in Schedule VII of the Act, and prioritised having regard to their expected impact, feasibility, and alignment with Cygnet's CSR objectives, before being placed before the CSR Committee for approval.

3 AREAS OF CSR ACTIVITY

Cygnnet shall undertake projects inclining with Section 135 of the Act read with Schedule VII including but not limited to Pursuant to Section 135 of the Act read with Schedule VII,

- Eradicating hunger, poverty, and malnutrition; promoting preventive healthcare and sanitation; and creating incentive care unit for charitable hospital making available safe drinking water;
- Promoting education/technology-based education for children, including special education and employment-enhancing vocational skills, especially among children, women, the elderly, and persons with disabilities, and livelihood enhancement projects;
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, old age homes, day care centres, and other facilities for senior citizens, and measures for reducing inequalities faced by socially and economically backward groups;
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources, and maintaining the quality of soil, air, and water, including contribution to funds for such purposes as notified by the Central Government;
- Protection of national heritage, art, and culture, including restoration of buildings and sites of historical importance and works of art; setting up public digital and physical libraries; and promotion and development of traditional arts and handicrafts;
- Measures for the benefit of armed forces veterans, war widows, and their dependents, including members of the Central Armed Police Forces and Central Paramilitary Forces, subject to notified conditions;
- Training to promote rural sports, nationally recognised sports, Paralympic sports, and Olympic sports;
- Contribution to the Prime Minister's National Relief Fund, the Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund), or any other fund set up by the Central Government for socio-economic development and relief and welfare of Scheduled Castes, Scheduled Tribes, other backward classes, minorities, and women;
- Contribution or funds provided to technology incubators located within academic institutions approved by the Central Government;
- Rural development projects;
- Slum area development;
- Disaster management, including relief, rehabilitation, and reconstruction activities;
- Contribution to such trusts, societies, or organisations as may further the aforesaid objectives; and
- All other projects and activities falling within the scope of Schedule VII of the Act, as amended from time to time.

4 ACTIVITIES, SETTING MEASURABLE TARGETS WITH TIMEFRAMES AND PERFORMANCE MANAGEMENT

Prior to the commencement of any project, Cygnnet carries out a baseline assessment covering parameters relevant to the chosen focus area, such as target beneficiary profile, existing infrastructure, and expected outcomes. Each project is implemented against defined targets, timelines, and budgets, and is reviewed quarterly by the CSR Committee. Wherever necessary, midcourse corrections are made to ensure the intended impact is achieved.

The following shall be the constitution of the CSR Committee, until amended. The Board of Directors of Cygnet shall have exclusive discretion to amend the constitution of the Committee, subject to the Act and the Rules:

Name of Committee Member	Title
Chatura Niraj Hutheesing	Director
Niraj Karnik Hutheesing	Managing Director
Tejinder Pal Singh Oberoi	Director

The CSR Committee constituted by the Board of Directors shall:

- Formulate and recommend to the Board this Policy and the activities to be undertaken;
- Recommend the amount of expenditure to be incurred on such activities;
- Monitor the Policy and its implementation from time to time; institute a transparent monitoring mechanism for projects undertaken;
- Formulate and approve an annual action plan in pursuance of CSR Policy covering the following aspects:
 - a. The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - b. The manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
 - 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: Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.]
- Ensure compliance with the Act.

The Board retains exclusive discretion to reconstitute the CSR Committee from time to time.

6 FUNDS ALLOCATION

Cygnnet shall allocate CSR expenditure in accordance with Section 135 of the Act, based on the recommendation of the CSR Committee and approval of the Board. Proposals for funding received throughout the year are evaluated by the CSR Committee against the focus areas set out in this Policy and prioritised after assessing their likely impact, before being approved for implementation at the Committee's discretion.

7 CSR SPENDING

The company shall endeavor to achieve the objectives of CSR Policy and allocate every year:

- a. Minimum 2% of its average net profits made during the three immediately preceding financial years
- b. Any income or surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the company and the same shall be ploughed back for use in CSR activities

Unspent CSR amount, if any, shall be transferred to separate account in accordance with the applicable CSR Rules from time to time.

8 MODE OF IMPLEMENTATION

CSR programs, projects or activities of the company should be implemented through following methods:

1. Directly by the company;
2. Implementing Agencies;
3. Any foundation or body incorporated by the company and eligible to undertake such CSR projects
4. in collaboration with other organizations/group companies

While the company can engage suitable Implementing Agencies to undertake approved CSR projects. The company can also partner with local governance bodies, such as Gram Panchayats, Civic Bodies, Municipality to directly undertake approved CSR projects with the help and support of these bodies.

9 MANAGEMENT COMMITMENT

Our Board of Directors, our management, and all our employees subscribe to the philosophy of responsible and compassionate corporate citizenship. We believe in building a society that works for everyone, and this belief is the cornerstone of our CSR Policy.

10 REVIEW PERIODICITY AND AMENDMENTS

This Policy may be reviewed, modified, or amended by the CSR Committee and the Board as and when required, including to reflect changes in applicable law, at such intervals as the Committee may deem fit.

Cygnnet Infotech Private Limited reserves its right to amend this Policy from time to time as per business and regulatory necessities