

POLICY ON CORPORATE SOCIAL RESPONSIBILITY

POLICY STATEMENT

Aptech Limited and its subsidiaries believe that Corporate Social Responsibility is not merely an activity for ensuring compliance towards Section 135 of the Companies Act, 2013 along with Companies (Corporate Social Responsibility Policy) Rules 2014, however it's the responsibility of the company towards the society, by positively impacting the lives of underprivileged.

SCOPE

This policy applies to Aptech Limited and its subsidiaries.

OBJECTIVE

The objective of the policy is to formulate and implement CSR activities and to ensure that CSR activities focus in the area of skill development, education, and healthcare.

DEFINITION OF UNDERPRIVILEGED HOUSEHOLD

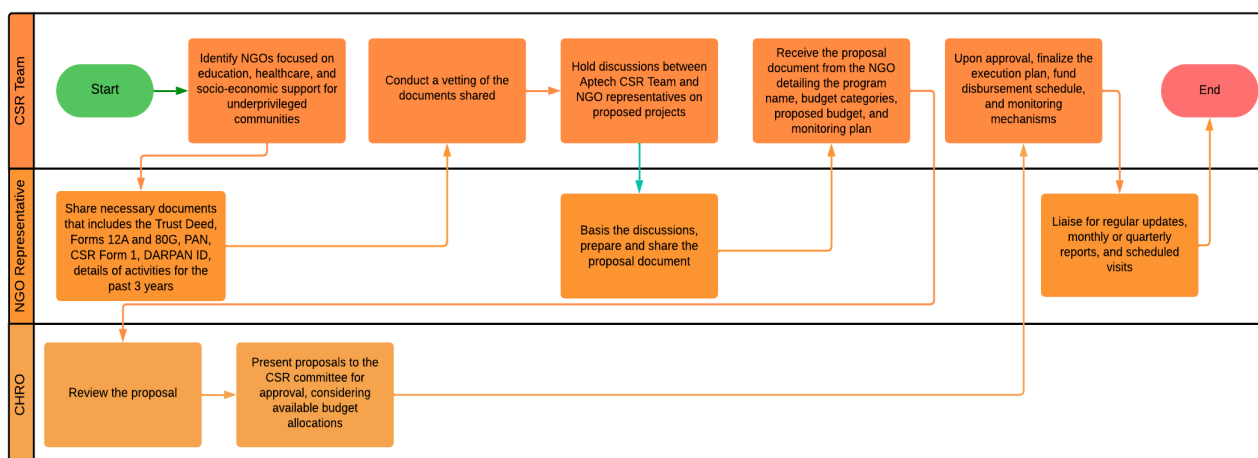
An individual whose annual household income is INR 3.00 Lakhs or less.

CSR ACTIVITY

Aptech Limited and its subsidiaries will be engaged in CSR activities which fall under the following areas:

Sr.No.	CSR Activities
1	Eradicating poverty, hunger and malnutrition, promoting health care which includes sanitation and preventive health care, contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
2	Improvement in education which includes special education and employment strengthening vocation skills among children, women, elderly and the differently-abled and livelihood enhancement projects.
3	Improving gender equality, setting up homes and hostels for women and orphans, empowering women, setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.

PROCESS OF CSR ACTIVITY EXECUTION



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REPORTING

Establishing reports to provide the details of CSR spent during the financial year and also listing the impact of the CSR activity.

CONSTITUTION OF CSR COMMITTEE

The CSR Committee will comprise of the following, in accordance with requirements of the applicable law:

- Mrs. Vandana Chamaria, Independent Director & Chairperson of the Committee
- Mr. Ronnie Talati, Independent Director & Member of the Committee
- Mr. Rajiv Agarwal, Non-Executive Director & Member of the Committee

FUNCTIONS OF CSR COMMITTEE

Pursuant to Section 135 of the Companies Act, 2013 read with Rule 5(2) of the Companies (Corporate Social Responsibility) Rules, 2014 as amended from time to time, the CSR Committee to consider, review and approve the CSR Annual Action Plan along with the following:

- a) the list of approved CSR projects or programmes.
- b) the manner of execution of such projects or programmes.
- c) the modalities of utilization of funds and for the projects for the projects or programmes.
- d) monitoring and reporting mechanism for the projects or programmes.
- e) details of need and impact assessment, if any, for the projects undertaken by the Company.

APPROVAL AUTHORITY

Approval authority of the CSR Policy will be the Board of Directors.

POLICY PREPARED BY:	POLICY RECOMMENDED BY:	POLICY APPROVED BY:
Shourya K Chakravarty (Group Chief Human Resources Officer & Head of CSR)	CSR Committee	The Board of Directors