

Corporate Social Responsibility Policy

**Computer Age Management
Services Ltd**



CSR Policy

1. Preamble	2
2. Objectives	2
3. Scope of Activities.....	2
3.1 Normal Course of Business.....	2
4. Key Focus Areas	2
4.1 Education and Vocational Training	3
4.2 Healthcare	3
4.3 Care for Disabled and Destitute	3
4.4 Social Welfare Projects	3
4.5 Investor protection, Awareness and Education on Best Practices	3
4.6 Sports	2
4.7 Contributions to public funded Universities; Indian Institute of Technology (IITs) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).....	2
5. Governance Structure	4
5.1 CSR Committee.....	4
5.2 CSR Team.....	5
6. CSR Budget.....	5
7. Project Life-Cycle	5
7.1 Project Approval	5
7.2 Implementation	5
7.3 Monitoring	6
7.4 Reporting.....	6
8. Partner Qualifications	6
9. Treatment of Surpluses.....	6

1. Preamble

The Computer Age Management Services Ltd. (CAMS) seeks to be a good corporate citizen in all aspects of its operations. At CAMS, it is believed that the business can generate value and long-term sustainability while making positive contribution to the betterment of the society through socially, environmentally and ethically responsible conduct of its operations.

2. Objectives

The key purpose of this policy is to:

- (a) To define what Corporate Social Responsibility (CSR) would mean to CAMS and determine CSR spend as stipulated in the Companies Act, 2013 and the rules there under
- (b) To identify and formulate the broad areas the Company shall pursue towards fulfilling its CSR obligations
- (c) To specify the modalities of execution of the projects and the implementation schedules
- (d) To lay down the monitoring and reporting mechanism for the CSR projects of the Company
- (e) Elucidate criteria for partners/implementation agencies
- (f) Explain the manner in which the surpluses from CSR projects will be treated

3. Scope of Activities

This policy applies to all activities that are undertaken as part of our CSR program. CAMS will classify those projects as CSR, which are over and above our normal course of business. This policy also fulfills the requirements of the CSR rules as per the Section 135 of the Companies Act, 2013.

3.1 Normal Course of Business

CAMS is an IT enabled service solution provider for Banking, Financial services and Insurance (BFSI) players in India.

4. Key Focus Areas

The broad areas of intervention that would be undertaken by the Company consist of the following:

4.1 Education and Vocational Training

CAMS seeks to promote education and vocational training through its CSR projects. While the right to primary education has been acknowledged as universal, challenges remain in delivery of primary education. An essential component of development is bridging this gap and enabling access to education for the underprivileged sections of the society.

In order to enable sustainable livelihoods, CAMS focuses on providing vocational training to develop skills and enhance employability, especially for the underprivileged.

4.2 Healthcare

While healthcare remains an important indicator of development, lack of adequate medical infrastructure and access to healthcare continues to plague many parts of rural and semi-urban areas in India. In its endeavor to promote healthcare (including preventive healthcare), CSR projects at CAMS seek to support those healthcare initiatives and medical research institutions that aim to enhance healthcare access, especially to the disadvantaged and underprivileged.

4.3 Care for Disabled and Destitute

Recognizing the need to reduce inequalities faced by socially and economically disadvantaged and backward groups, one of CAMS's focus areas in CSR includes the care for the physically challenged, the mentally challenged and the destitute. These may include CSR projects with NGO's and other institutions of repute that work in the areas of care of the mentally/ physically challenged, orphanages, old age homes and hospice care.

4.4 Social Welfare Projects

In its commitment to environmental sustainability, CAMS will place preference on those social welfare projects that involve areas of water conservation and protection of the environment.

4.5 Investor protection, Awareness and Education on Best Practices

In furthering its CSR commitment, CAMS intends to enhance financial literacy for investors as well as youngsters who have entered or about to enter job stream via investor awareness and education projects. CAMS is licensed by SEBI to provide investor services and has two decades of expertise in providing these services. Leveraging this expertise, CAMS CSR projects would include communicating best practices to investors and potential investors on managing and securing their investments during its life cycle, information on investor rights, investor privileges, record keeping, access to self-services and grievance resolution mechanisms. The activities for these projects could entail creating content for the awareness or education programs (including short films), organizing physical events or workshops, publications in print media or online media or others.

4.6 Sports

CAMS seeks to promote the Training to rural sports, nationally recognised sports, paralympic sports and Olympic sports.

4.7 Contributions to public funded Universities; Indian Institute of Technology (IITs) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs)

5. Governance Structure

CAMS has constituted a robust and transparent governing mechanism to oversee the implementation of its CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013.

5.1 CSR Committee

The governance structure for the CSR interventions of CAMS will be headed a CSR Committee of the Board. The said CSR Committee of the Board will be ultimately responsible for the implementation of the CSR interventions. This Committee is composed of 3 members, with an appointed Chairman. The details of the members of the CSR Committee are available [here](#).

5.1.1 Responsibilities of the CSR Committee

- Formulate CAMS's CSR Policy, which will be approved by the Board of CAMS
- Recommend the CSR expenditure to the Board of CAMS, for approval; entitled to recommend a higher amount than that specified in the Companies Act 2013 based on financial and other considerations
- Suggest areas of intervention to the Board of CAMS and the amounts to be spent on each of the areas of intervention that have been approved by the Board for CSR
- Prepare Annual Action Plan which shall include the following:-
 - 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,
 - c) The modalities of utilization 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.

- Ensure approval of projects for CSR Spend that are eligible under the notified category of activities for the purpose of the CSR.
- Set up monitoring mechanisms for the projects undertaken
- Meet at a periodicity it deems fit to review the progress
- Review the CSR policy once every year and recommend to the Board the modifications that may be required

The CSR Committee of the Board shall be supported by the CSR Team for CSR at the Company Level. The CSR Committee is entitled to delegate the approval of the projects to the Chair of the CSR Team.

5.2 CSR Team

The CSR Team is responsible for ensuring the smooth execution of all the projects within the company. The team will report to the CSR Committee. The members of this team will include the Chief financial Officer, Company Secretary and other employees from Secretarial and Finance team who are involved in execution of the projects.

5.2.1 Responsibilities of the CSR Team

- Responsible for the execution of the decisions taken by the Board-level CSR Committee
- Carry out due diligence for projects for the purpose of CSR and recommend projects to the CSR Committee
- Ensure on-ground implementation of projects approved by the CSR Committee
- Report periodically to the Board-level CSR Committee
- Review progress every quarter

6. CSR Budget

The total budget proposed for the CSR projects covered under this policy shall be 2% of the average net profits of CAMS made during the three immediately preceding financial years; where the 'net profit' is calculated as per the provisions of the Companies Act 2013 for CSR Spend.

The company may however spend amounts in excess of the above 2% and can set it off subject to the provisions of the Companies Act.

7. Project Life-Cycle

At CAMS, our CSR projects are strategically planned and managed. Following are the different stages of the project:

7.1 Project Approval

The projects suggested by CSR Team will be presented for the approval of the Board-level CSR Committee, which shall be based on the recommendation of the CSR committee be approved by the Board. Those projects will be given preference for approval that is located in proximity to the areas around where the Company carries on its operations and can extend to areas all over the country.

7.2 Implementation

The CSR Team shall formulate a plan of action for the projects that have received the approval of Board-level CSR Committee specifying the following:

- (i) Activities to be undertaken
- (ii) Budgets proposed
- (iii) Time frame of implementation
- (iv) Responsibilities and authorities for implementation
- (v) The Results expected to be achieved post implementation.

The Company may implement the CSR projects in one or more of the following modes or by way of a combination there of and the CSR Committee shall recommend the mode from time to time.

- (i) Directly by the Company as projects or towards the contribution towards the corpus for approved projects
- (ii) Through a registered trust or registered society or Company established under section 8 of the Companies Act 2013.
- (iii) Collaborate with other Companies for undertaking projects jointly.
- (iv) Making Payments to approved Entities or Funds.

To ensure that the Company is in a position to carry out its CSR obligations effectively, it shall identify resources and also build the capacities as may be required either with their own personnel or through the resources of implementing agencies. The amount of expenditure towards this purpose shall be within the limits as prescribed under the Act/Rules.

7.3 Monitoring

The CSR Team along with the working team of project and program managers/ owners will be responsible for monitoring of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports. To ensure the transparency and efficiency of the implementation process, mechanisms to track data and monitor projects will be established. These projects will be evaluated against the milestones defined as per the plan of action and reviewed by the CSR Team on a quarterly basis.

7.4 Reporting

The Board-level CSR committee, based on reports presented by the CSR Team, will annually publish report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act, 2013. The CSR Committee shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR policy is in compliance with the approved CSR policy of the Company.

The CSR Policy on being approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

8. Partner Qualifications

Where CSR programs are awarded to implementation agencies, CAMS will ensure that they are a Registered Trust, Society or a Section 8 Company. It will conduct due diligence on potential partner NGOs to ensure that the partners have clearly explained mission and vision, and have appropriate documentation such as audit reports, annual reports and registration forms as per 80G/12A.

9. Treatment of Surpluses

In the event of any surplus arising out of CSR projects undertaken by CAMS, the same shall not form part of the business profits of the Company and shall be spent towards further CSR activities.
