

9.9 GROUP PRIVATE LIMITED **CORPORATE SOCIAL RESPONSIBILITY** **(CSR) POLICY**

In compliance with the requirements of Section 135 of the Act read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, the amount to be spent by a Company under sub-section (5) of section 135 does not exceed fifty lakh rupee therefore the requirement under sub-section (1) of section 135 for constitution of the Corporate Social Responsibility Committee is not applicable and the functions of such Committee provided under this section shall be discharged by the Board of Directors of the Company as per provisions of sub-section (9) of section 135. The Board of Directors at its meeting held on October 13, 2021 has approved and adopted the CSR Policy in line with the requirements of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021.

Preamble:

We, at 9.9 Group Private Limited set a very high bar for integrity and ethics; we are transparent with both employees and partners and expect them to respect confidentiality. As a leadership developer, we are committed to nurturing individuals, providing them with mentoring and coaching, and creating opportunities for them to realize their true leadership potential. We are fair and meritocratic in our evaluation of people, and treat them with genuine caring and sensitivity.

We ensure that every interaction that our customers, partners and vendors have with us enhances their respect for us. We act in a socially responsible manner and devote appropriate resources and energies to CSR activities close to our heart.

Key words & meanings:

1. “Act” shall mean the Companies Act 2013, including any modifications, amendments or reenactment thereof.
2. “Board” shall mean the Board of Directors of the Company.
3. “CSR Annual Plan” shall mean the annual plan detailing the CSR expenditure for the year.
4. “CSR Policy” shall mean the present Corporate Social Responsibility Policy of the Company, which covers the activities to be undertaken by the Company as specified in Schedule VII to the Act and the CSR Expenditure thereon.
5. “CSR Projects” or “Projects” means Corporate Social Responsibility projects/activities/ programs/ initiatives, instituted in India, either new or ongoing, and include, but is not limited to those undertaken by the Board.
6. “Financial Year” shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.

7. “Rules” shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any reenactment, modifications or amendments thereof.

Policy Objectives:

The objective of the CSR Policy (“Policy”) is to lay down the guiding principles in undertaking various Programs and projects by or on behalf of the Company relating to Corporate Social Responsibility (“CSR”) within the meaning of section 135 of the Companies Act, 2013 read with Schedule VII of the Act and the CSR Policy Rules 2014. (“Rules”)

CSR Activities:

The activities that the Company may undertake shall be (inter alia):

- promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects. This can be in following forms:
 - Financial Assistance to students
 - School Adoption/Management
 - Skill Enhancement Programs
 - Educational Awareness Programs
 - Activity Based Learning Programs and Events etc.
- 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;
- eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
- contribution to the prime minister’s national relief fund or Prime Minister’s Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government;
- Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies,

namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);

- ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining quality of soil, air and water;
- 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;
- measures for the benefit of armed forces veterans, war widows and their dependents;
- rural development projects.

Exclusions:

Following activities shall be excluded from the CSR expenditure:

- Activities which are exclusively for the benefit of employees of the Company or their family members;
- Activities undertaken in pursuance of normal course of business of the Company;
- Direct or indirect contribution to political parties;
- Expenditure on item/s not in conformity with Schedule VII of the Companies Act 2013;
- Surplus arising out of CSR projects shall not form part of the business profits of Company instead the same will be further used for CSR purposes only.

Geographies and beneficiaries

Geographies

The Company will give preference to the local areas around its operations for spending the amount earmarked for CSR activities. 9.9 Group's operations are mainly concentrated in the following areas:

- Delhi NCR
- State of Haryana, Uttar Pradesh, Maharashtra, Karnataka
- 9.9 Group may undertake CSR activities in any other area in India as may be decided, from time to time

Beneficiaries

The beneficiaries of 9.9 Group's CSR programs may be the following categories of people:

- Children / students
- Women
- Weaker sections of the society
- Others – society at large

Role of the Board for CSR Implantation:

- i) To approve the CSR Policy & disclose the contents of such policy in its report and also place it on the Company's website;
- ii) Ensure that the activities proposed in the CSR Policy are undertaken;
- iii) Ensure that the company spends, in every financial year, at least 2% of average net profits of the company made during the 3 immediately preceding financial years, as required under Section 135 of the Companies Act, 2013 & Rules made thereunder;
- iv) If company fails to spend the sum as mentioned above, then the Board shall, in its Report specify the reasons for not spending the amount.
- v) Monitor the Corporate Social Responsibility Policy of the Company from time to time.
- vi) Review the progress of CSR projects already undertaken by the Company and the utilization of budgets for each such projects.
- vii) Review and include the CSR report in the Board's report.
- viii) Review and adopt any amendments required to be made in the CSR policy of the Company.

Meetings:

- The Board shall meet to review implementation of CSR Policy as and when required. The meeting shall be held either at the Registered Office of the Company or any other place, as may be decided by the directors.
- A meeting may be called by the Chairman or by any two (2) directors of the Company.

Implementation and Monitoring:

The CSR activities undertaken by the Company either directly or through an implementing agency shall be periodically monitored. While monitoring, the Company shall ensure the Implementing Agency or the vendor, follow ethical practices and endeavor to ensure all payments made to the Implementing Agency or the vendor to be milestone based. The Monitoring process adopted by the Company may include obtaining of reports of different kind, self-declaration, On-site visit, etc.

Effective Date & Amendment of Policy:

The CSR Policy shall be effective from the date of its approval by the Board of Directors. The CSR Policy of the Company may be amended at any time by the Board of the Company as and when required.
