



CORPORATE SOCIAL RESPONSIBILITY

(CSR Policy)

1. CSR POLICY:

This CSR Policy of Smokescreen Technologies Private Limited's (hereinafter referred to as "Smokescreen") has been developed in accordance with Section 135 of the Companies Act, 2013 and the Rules framed thereunder. This CSR Policy encompasses Smokescreen's philosophy for social responsibilities and lays down the guidelines and mechanism for undertaking projects, programs and activities towards such responsibilities.

2. OBJECTIVE:

The CSR Policy lays down guidelines for undertaking programs geared towards social welfare activities or initiatives in compliance with Section 135 of the Companies Act, 2013 and notifications issued thereafter. Through this CSR Policy, we propose to adopt the CSR activities mentioned below.

The objective of this CSR Policy is to:

- Outline projects, programs and activities to be undertaken by Smokescreen;
- Specify the modalities of execution of such projects, programs and activities;
- Monitor the process to be followed for such projects, programs and activities;
- Directly or indirectly take up programs that benefit the communities in and around its work centers and results, over a period of time, in enhancing the quality of life and economic well-being of the local populace; and
- Generate community goodwill for Smokescreen and help reinforce a positive and socially responsible image, through our CSR activities.

3. CSR COMMITTEE:

- The CSR Committee has been constituted in accordance with the provisions of the Act comprising of the following 2 (two) Directors.
 - a. Mr. Sahir Hidayatullah; and
 - b. Mr. Raviraj Doshi
- The CSR Committee may invite other experts/ invitees as per its requirements.



- The CSR Committee shall be responsible for:
 - (i) Identifying programs and projects to be undertaken under the CSR policy as per Schedule VII of the Companies Act 2013.
 - (ii) Formulating the CSR Policy, including the CSR activities and their budgets as well as recommendation of any subsequent change/ modification to the CSR Policy;
 - (iii) Institute an implementation and monitoring mechanism for CSR activities;
 - (iv) Periodically updating the Board on the progress being made in the planned CSR activities;
 - (v) Providing a responsibility statement in the Board's report.

4. CSR WORKING COMMITTEE:

The CSR Working Committee has been constituted to assist the CSR Committee with the implementation and impact assessment of the CSR initiatives. The CSR Working Committee comprises of the following:

1. Mr. Uttam Gujrati, CFO
2. Mr. Abhishek Parikh – AVP Operations
3. Ms. Jacinta Fernando – Head – Sales Operations

5. PROJECTS, PROGRAMS AND ACTIVITIES:

- Smokescreen has identified the following areas for undertaking CSR activities:
 - a. Prime Minister's National Relief Fund or any other fund set up by the central government for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
 - b. Contributions or funds provided to technology incubators located within academic institutions which are approved by the central government;
 - c. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water; and
 - d. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;



- The preference will be given to local areas for carrying out CSR activities or such areas as may be identified by the CSR Committee, from time to time.
- The CSR Committee may also approach external consultants for necessary assistance as it may deem fit at such costs as may be approved by the Board.
- Based on the recommendations of the CSR Committee, the Board shall approve the following:
 - a. The specific CSR activities that should be undertaken from time to time;
 - b. The amount of the CSR expenditure on each of the CSR activity; and
 - c. Whether the CSR activities will be undertaken directly or through an implementing agency or in collaboration with any other companies, including by availing services of any NGOs and record reasons for the same.
- Activities undertaken in pursuance of the normal course of Smokescreen's business shall not be considered towards CSR expenditure.

6. CSR EXPENDITURE AND ALLOCATION

The CSR spend by Smokescreen for any financial year shall be as per the requirements of the Companies Act 2013. The Board shall approve the allocation of the CSR expenditure on the CSR activities and, to the extent possible, shall give priority to the local areas wherever Smokescreen has its operations.

7. IMPLEMENTATION

- Survey would be conducted by the implementing agency and annual reviews shall be undertaken to ascertain the progress.
- The Board along with the CSR Committee and the CSR Working Committee shall be responsible for implementation of this CSR Policy.
- The CSR activities may be undertaken either ourselves or through other qualifying Non-government organizations (“**NGOs**”) or agencies. The projects, programs or activities identified by the CSR Committee and approved by the Board shall be implemented through the CSR Working Committee. Suitable documents



/ agreements shall be entered into with NGOs and the other agencies for the purposes of implementation of the CSR activity, in case the CSR activity is proposed to be implemented through the third-party agencies.

8. MONITORING MECHANISM

- To ensure effective implementation of the CSR projects, programs and activities undertaken in terms of this CSR Policy, the progress of each such project, programs and activity will be reported to the CSR Committee on a periodic basis, with all requisite documentation.
- A periodic report on implementation shall be submitted to the Board by the CSR Committee.
- The CSR Committee shall also try to obtain feedback from the beneficiaries of the CSR projects, programs and activities. If considered necessary, the effectiveness of the various programs/ activities undertaken under the CSR Policy may be got evaluated through external agencies for providing the required feedback and inputs to formulate and improve the programs in future.

9. IMPACT ASSESSMENT

- Regular and interactive feedback sessions shall be conducted at all levels including with other NGOs through which CSR activities are being undertaken as well as the respective beneficiaries of all the CSR activities undertaken by us.
- Field visits shall be conducted at regular intervals to **ensure** effective implementation.
- Proper documentation shall be done in an MIS **format** to record key observations of such feedback sessions and field-visits.
- If deemed necessary by the CSR Committee, the effectiveness of the various programs/ activities undertaken under the CSR Policy may be evaluated **through** external agencies and reports shall be prepared pursuant to such evaluation.

10. REPORTING

- The CSR Committee shall maintain proper minutes of all its meetings.
- The CSR Committee shall prepare an annual report on CSR with such information and particulars as may be required by the Act and such report shall be included in the Board's report annexed to the financial statements.



- The Board's report shall include an annual report on CSR containing such details as may be prescribed from time to time under the Act and the CSR Rules.
- The Board will be responsible to ensure that the statutory requirements as may be prescribed from time to time under the Act and the CSR Rules are complied with.

11. GENERAL

- Any surplus arising out of the CSR projects/programs or activities shall not form part of the business profits of the Smokescreen.
- All administrative expenses, including expenditure on wages and salaries, tours and travels, and training and development of personnel deputed on CSR activities would be borne from CSR funds. However, the expenditure in a financial year for building CSR capacities of the personnel as well as the implementing agencies shall not exceed 5% (five per cent) of total CSR expenditure in such financial year.
- If it is observed that any CSR activity taken up for implementation is found not properly implemented, the CSR Committee may, with approval of the Board, may discontinue funding the project at any time during the course of implementation and use such funds for any other project.
- The CSR Committee shall have the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this CSR Policy.

12. AMENDMENT

The CSR Committee is empowered to amend or modify the CSR Policy and such changes shall be placed before the Board for its approval. The Board may subject to compliance with applicable law, at any time approve or alter, amend or modify the CSR Policy, as it deems fit to comply with the statutory obligation to undertake the CSR activities.

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