

# **JAMOCHA TECH PRIVATE LIMITED**

**REGD. OFFICE: NO. 731, 2ND FLOOR, 3RD BLOCK, KORAMANGALA, BANGALORE - 560034**

## **CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY**

### **INTRODUCTION**

The Corporate Social Responsibility (hereinafter referred to as 'CSR') Policy governs Jamocha Tech Private Limited (hereinafter referred to as 'Prohance') and its social initiatives and activities in India. With a purpose to enable a better, safer and more interconnected world, Prohance India concentrates its social interventions and actions to solve important problems in society and enabling communities and economies to prosper. While it strives to deliver excellence in business, it wholeheartedly contributes towards being a part of positive societal change.

The Company plans to support various projects permitted under relevant provisions of CSR regulations, as applicable for the time being in force. It aims to develop the required capability and self-reliance of beneficiaries at the grass roots, especially of women, in the strong belief that these are the critical cornerstones that define social and economic development of a society. It provides assistance to organisations engaged in driving positive change in society to help them reach and deliver their full potential. Lastly, it contributes to creating stronger and more inclusive communities.

Prohance India implements its CSR interventions through (i) Company personnel, or (ii) external implementing agencies and partners from the public and private sectors. It encourages its employees to volunteer, and fundraise, and supports their efforts to make a difference.

This policy is also in line with Section 135 of the Companies Act 2013, as enacted in the Republic of India. Section 135 of the Companies Act 2013 is applicable to every company, including its holding or subsidiary, and foreign companies having its branch or project office in India and with net worth of INR 500cr (INR 5bn) or more, or a turnover of INR 1000cr (INR 10bn) or more, or a net profit of INR 5cr (INR50m) or more during any of the three preceding financial years. Under this section of the Companies Act 2013, in every financial year, such company must allocate at least 2% of its average net profits made during the 3 immediately preceding financial years. The Company must also constitute a CSR committee and Executive committee, formulate a CSR policy, recommend CSR expenditure amount, monitor policies and activities, and report to the Chairperson. Chairperson must approve the CSR policy; and include the CSR Report in its Annual Report (Annexure 2).

### **I. BRIEF BACKGROUND OF JAMOCHA TECH PRIVATE LIMITED (“PROHANCE”)**

Jamocha Tech India Private Limited, founded in 2009, is a SaaS Service Provider which enables Workforce Productivity Analytics and Management with more than 100 employees. Its licenses are deployed and used by more than 150,000 users globally and in more than 20 countries, and has its headquarters in Bangalore, India.

### **II. CORPORATE SOCIAL RESPONSIBILITY PHILOSOPHY**

The activities of Prohance are spread across few states in India with primary operations based out of Bangalore. Prohance has an immense opportunity to contribute to the society in different aspects and ways across the states in which we operate.

The CSR initiatives of Prohance is steered by the guiding principle of sensitivity to the needs of the people, enhancing the quality of their lives and protection of the environment.

CSR of Prohance involves the following:

- a. Welfare measures for the community at large including employees and their families, to ensure the poorer section of the society is benefited
- b. Contribution by way of social and cultural development, imparting education, training and social awareness especially for the economically backward class for their development and to enable them to be financially stable

- c. Protection and safeguard of the environment and maintaining ecological balance

### III. OBJECTIVES OF THE CSR POLICY

The key objectives of the CSR policy are:

- a. To specify focus areas for CSR activities
- b. To set out the implementation strategy of the CSR initiatives
- c. To institute the monitoring mechanism for the CSR initiatives
- d. To lay down the methodology for and measuring the outcomes and impact of the CSR initiatives

### IV. FOCUS AREAS FOR CSR INITIATIVES

Prohance India is committed to initiate and drive the CSR projects in accordance with the focus area as per Prohance India and as per Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014, which includes, but is not limited to:

The focus areas as per Prohance India are:

- a. Quality education (1. **Education**)
- b. Decent work and economic growth (5. **Social empowerment & 6. Rural development**)
- c. Climate action (4. **Environment**)
- d. Life on land (3. **Health care & 7. Sports and culture**)
- e. Life below water (2. **Water & 4. Environment**)
- f. Gender equality (1. **Education**)

The focus areas as per Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014 are:

(i) 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.

(ii) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.

(iii) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; 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.

(iv) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.

(v) 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 art and handicrafts;

(vi) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widow;

(vii) Training to promote rural sports, nationally recognized sports, paralympic sports and olympic sports

(viii) Contribution to the prime minister's national relief fund 8[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;

(ix) (a) 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; and

(b) 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 Organization (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)

(x) Rural development projects

(xi) Slum area development.

(xii) Disaster management, including relief, rehabilitation and reconstruction activities

**A broad outline on the focus areas as per Prohance India has been highlighted below.**

## **1. EDUCATION**

- a. Support to technical/vocational Institutions for their self-development
- b. Academic education by way of financial assistance to primary, middle and higher secondary schools
- c. Adult literacy especially amongst those belonging to below the poverty line
- d. Awareness programmes on girl education
- e. Counselling of parents
- f. Special attention on education, training and rehabilitation of mentally & physically challenged children/persons
- g. Spreading awareness of law amongst people and disadvantaged sections of the society about their rights & remedies available
- h. Promotion of professional education by setting up educational institutions offering courses in Engineering, Nursing, Management, Medicine, Technical subjects, etc.
- i. Provide fees to poor and meritorious, preferably girl students of the schools near Prohance's operations to enable them to get uninterrupted education
- j. Provide bicycles to needy girl students who are attending school in remote and distant areas

## **2. WATER SUPPLY INCLUDING DRINKING WATER**

- a. Installation/repair of hand pumps/tube wells
- b. Digging/renovation of wells
- c. Gainful utilisation of wastewater from underground mines for cultivation or any other purpose
- d. Development/construction of water tank/ponds
- e. Rainwater-harvesting scheme
- f. Formation of a task force of volunteers to educate people regarding proper use of drinking water
- g. Empowerment to the villagers for maintenance of the above facilities for availability of water

## **3. HEALTH CARE - ORGANISING HEALTH AWARENESS CAMPS ON:**

- a. AIDS TB and leprosy
- b. Social evils like alcohol, smoking, drug abuse etc.
- c. Child and mother care
- d. Diet and nutrition
- e. Operation Jyoti – Vision 2020 to help the people of the peripheral area for necessary assistance
- f. Blood donation camps
- g. Diabetics detection & Hypertension Camps
- h. Family Welfare
- i. Senior citizen health care wellness clinics
- j. Fully equipped mobile medical vans
- k. Supplement the different programmes organised by local/state authorities

## **4. ENVIRONMENT**

- a. Organising sensitising programmes on Environment Management and Pollution Control
- b. Green belt development

- c. Afforestation, social forestry, maintenance of dams and parks
- d. Restoration of mined out lands
- e. Development of jobs related to agro products i.e. dairy/poultry/farming and others
- f. Plantation of saplings
- g. Animal care

## **5. SOCIAL EMPOWERMENT**

- a. Self /gainful employment opportunities – Training of Rural Youth for Self-Employment (TRYSEM) on welding, fabrication, and other electronic appliances
- b. To aid villagers having a small patch of land to develop mushroom farming, medicinal plants, farming & other cash crops to make them economically dependent on their available land resources. Training may be provided by agricultural experts for above farming
- c. Organising training programmes for women on tailoring embroidery designs, home foods/fast foods, pickles, painting and interior decoration and other vocational courses
- d. Care for senior citizens
- e. Adoption/construction of hostels (specially for the underprivileged girls)

## **6. RURAL DEVELOPMENT**

- a. To develop infrastructural facilities for providing electricity through solar lights or alternative renewal energy to the nearby villages. Recurring expenditure should be borne by the beneficiaries
- b. To install windmills as alternative source for providing electricity in villages

## **7. SPORTS AND CULTURE**

- a. Promotion of sports and cultural activities for participation in state and national level
- b. Promotion/development of sports activities in nearby villages by conducting tournaments like football, kabaddi and kho kho and other sports
- c. Providing accessories and other requirements for football, volleyball, hockey to young and talented villagers
- d. Promotion of national level teams
- e. Sponsorship of national sports events
- f. Sponsorship of cultural events to restore Indian cultural traditions and values
- g. Providing facilities for physically handicapped persons
- h. Supporting preparing of documentary films to promote sports
- i. Granting financial assistance/donation/sponsorship for sport events

## **GRANTING DONATIONS TO NGOS FOR APPROVED PURPOSES AS PER THIS POLICY**

## **9. DISASTER MITIGATION**

- a. To provide food, cloths, medicine and other essential things to the peoples of disaster affected areas
- b. Granting financial assistance/donations for rebuilding infrastructure, health care and rehabilitation programmes for disaster affected areas

Prohance will take up other CSR initiatives as may be required from time to time, in accordance with the focus area as per Prohance India and in compliance with Schedule VII of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014.

### **Geographic Scope**

The geographic scope of Prohance CSR work priority wise includes:

- a. the immediate surroundings of the registered office and/or branch offices of Prohance;
- b. the district, town or city as a whole where the registered office and/or branch offices of Prohance are located;
- c. the country as whole as part of Prohance's contribution to national efforts towards dealing with emergency situations and achieving higher national goals.

Preference will be given to the local area and areas around which Prohance operates for undertaking the CSR activities.

## **V. ROLES AND RESPONSIBILITIES**

This policy applies to all employees and management in India.

The CSR Committee is responsible for the overall management and supervision of the CSR activities in India. The CSR Executive Committee will develop consistent narratives and programmes to build stakeholder trust and to continually improve the Company's reputation and profile as a responsible corporate citizen.

Individual employees must comply with the requirements of this policy and supervisors are responsible for ensuring compliance.

Any employee who has knowledge of a potential or actual violation of this CSR Policy must promptly report this to the CSR Executive Committee according to the existing policy and guidelines.

This requires transparency and integrity in all its business dealings and this principle applies fully to all CSR activities as well.

## **VI. RECORD RETENTION**

Records governed by this policy must be maintained in accordance with applicable Prohance India, local and/or divisional policies or procedures.

## **VII. RESTRICTIONS AND PROHIBITIONS**

The following activities are prone to have a negative effect on the Company's image and thus should be avoided. The Company will not, in its CSR activities:

- a. Support organisations that discriminate based on age, sex, race, religion, national origin, sexual orientation, or disability with respect to employment, volunteer participation, or the provision of services
- b. Solicit financial support for politicians, candidates for political office or political parties. Political donations made by individual employees must not jeopardise the company's regional and global reputation
- c. Engage with organisations and programmes that are averse to the Company, or that may involve a potential conflict of interest for the Company
- d. Reward, attempt to reward or to influence persons or entities that do business with, or are in a position to generate business for the Company
- e. Use any type of CSR activity in violation of local and international bribery and corruption and other financial crime laws, rules, regulations or internal Prohance policies and control

Note: The Company can exclude certain types of organisations (e.g. political parties or activist organisations) to protect the Company's integrity and reputation

## **VIII. GOVERNANCE FRAMEWORK / KEY OPERATING PROCEDURE**

### **CSR Committee:**

The Company will set up a CSR Committee. This will be the apex body that will provide the overall direction & governance to the CSR programme being undertaken by the Company in line with the Prohance India & new CSR provisions, as articulated in Section 135 of the Indian Companies Act 2013, and the attendant rules, clarifications and circulars issued by the Ministry of Corporate Affairs.

The CSR Committee is constituted of the Board of Directors of Prohance as its members.

The following persons are the members of the CSR Committee:

1. **Mr. Rajesh Sharma**
2. **Mr. Kishore Polam Reddy**
3. **Mr. Ankur Dhingra**

The CSR Committee may appoint an executive committee as required from time to time who would be responsible for day-to-day execution of tasks.

### **CSR Executive Committee**

The executive committee comprises of the following members responsible for day-to-day execution of tasks as below:

While the CSR Executive Committee will be responsible for all financial decisions and programme approvals, it may work with relevant officers of the company for effective and efficient management of the various programmes and attendant processes. Such officers will be responsible to and report to the CSR Executive Committee for all activities undertaken to implement/manage the approved CSR programme.

The Chief Financial Officer of the Company will certify that the funds so disbursed have been utilised for the purposes and in the manner as approved by the CSR Committee and Board.

The CSR Committee will have a minimum of 2 meetings in a year, however the Executive Committee may meet any number of times as per their need.

### **Key Operating Procedures**

1. Towards achievement of the CSR targets, the CSR Committee will identify opportunities for CSR activities within the broad framework outlined in this policy. The committee will additionally be responsible for facilitating selection of appropriate agencies for implementation, supervising and monitoring the quality of work and reporting to the Board about the progress. The Committee will, from time to time, also provide necessary inputs into the preparation of the Annual CSR plan. Furthermore, the appropriate agencies must be a registered trust or registered society or a company established under section 8 of the Companies Act, 2013 as to fulfill the criteria for their eligibility under Notifications, for which suitable documentation as an evidence should be kept.
2. Within the overall framework of the CSR Policy and aligned to the business plan of the Prohance, the CSR Committee will facilitate the development of an annual CSR action plan and budget. This will include projects identified by Prohance staff at various locations, if any. The Annual CSR Plan detailing the individual projects and budgeting will become operational after review and approval by the Prohance Board.
3. The CSR Committee will have the option to co-ordinate, monitor and assist operationalization of the activities in partnership with a range of stakeholders including Civil Society Organizations, Community based organizations and other public and private sector enterprises. Services of technical experts will be sought when required. For this purpose, Prohance can enter into agreements with these agencies and/ or experts on agreed terms of reference including detailed work plans with budgets and timelines.
4. CSR Committee will prepare Annual plans, follow up on financial and programme targets, recommend CSR projects, facilitate agencies selection, co-ordinate periodic monitoring and evaluation visits, provide feedback to the implementing organizations and report to the Board of Prohance.

### **Implementation Mechanism**

1. Overall, the CSR Committee will be responsible for overseeing the planning, coordination and implementation of CSR activities including compilation of information and preparation of annual reports, etc. The CSR Committee will be responsible for identifying appropriate opportunities/ projects for CSR as well as facilitating necessary processes for operationalizing the projects.
2. While identifying the CSR initiative the following considerations will be taken into account:
  - i) Thrust of the schemes/projects should be in the identified priority areas of Prohance.
  - ii) While implementing the identified projects, time frames and milestones will be predefined.
3. The financial limits and the sanctioning authorities for CSR projects shall always be approved by the Board of Directors of Prohance.

### **Allocation Of Funds**

The following criteria shall be followed in the allocation of funds:

1. The CSR Budget, in every financial year, shall be two per cent of average net profits of Prohance made during the three immediately preceding financial years, as per the Notifications; Schedule VII and Section 135 of Companies Act, 2013 on CSR, which shall be approved by the Prohance Board.
2. The surplus arising out of CSR projects or programs or activities shall not form part of the business profit of the Company.
3. Fund disbursement to implementing organization(s) would be released after the requisite documentation between Prohance and the organization(s) with the recommendation of the CSR Committee and then approval by the Board of Prohance.

### **Review and Reporting**

1. CSR Committee will meet on a need basis, to review the progress of proposed activities as per agreed targets and timelines.
2. An annual report of the activities undertaken under the CSR initiatives will be prepared as prescribed by law and suitably integrate into the Board's Report of Prohance.
3. CSR Committee will evaluate the CSR activities.

### **Display**

1. This CSR Policy will be displayed on the website of Prohance.
2. The significant contents of this Policy as notified by law will be disclosed in the Board's Report of Prohance.

### **General**

1. The Company reserves the right to modify, cancel, add, or amend any of the above contents of the Policy but subject to the approval of Board of Prohance.
2. Any or all provisions of the CSR Policy shall be subject to revision/amendment in accordance with the Companies Act, 2013 and any notifications on the subject as may be issued by Ministry of Corporate Affairs, from time to time.
3. In case of doubt with regard to any of the provision of the Policy and also in respect of matters not covered herein, the interpretation & decision of the Board of Prohance shall be final.

## ANNEXURE 1

### List of documents / information to be obtained / considered while engaging other entities

- a. Memorandum of Association and Articles of Association
- b. Charter constituting the entity
- c. Registration Certification
- d. Audited financial statements / accounts for the last three years
- e. IT Exemption Certificate under Section 80G / 35(i), as may be applicable and available
- f. Pan Card
- g. Letter of authority or approval, as may be applicable, for the entity to undertake the project
- h. Details of the entity's organisation structure, capability, technical skills and manpower resources
- i. CSR-1 or any other applicable form as may be prescribed by Government for the time being in fo

## ANNEXURE 2

### Annual Report on Corporate Social Responsibility (CSR) Activities

1. A brief outline of the Company's CSR Policy, including overview of projects or programmes proposed to be undertaken
2. The composition of the CSR committee. Please refer to the head - Board of Directors and Board Committees forming part of this report.
3. Average net profit of the Company for the last three financial years
4. Prescribed CSR expenditure (two percent of the amount as in item 3 above)
5. Details of CSR spent during the financial year
  1. Total amount to be spent for the financial year: [figure as stated in sl. no. 4 above]
  2. Amount unspent, if any:
  3. Manner in which the amount spent during the financial year is detailed below
  1. Direct expenditure on projects or programs
  2. Overheads

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
S. No	CSR project or activity identified	Sector in which the project is covered	Projects or programmes; 1. Local area or other district where projects or programmes was undertaken	Amount outlay (budget) project or programmes wise	Amount spent on the projects or programmes <b>sub-heads:</b> 1. Direct expenditure on projects or programmes 2. Overheads	Cumulative expenditure up to the reporting period	Amount spent: Direct or through implementing agency

### Reasons for not spending prescribed amount (two per cent of the average net profit of the last three financial years or any part thereof) towards CSR activities

Prohance has been working towards various CSR projects and therefore the prescribed amount has not been spent as these projects are in the pipeline.



## **Our CSR Responsibilities**

We hereby affirm that the CSR Policy, as approved by the CSR Committee has been implemented and the CSR Executive Committee monitors the implementation of the project and activities in compliance with our CSR objectives.