



PathPartner CSR Policy
PathPartner Technology Private Limited

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Revision History

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1.00	Initial baseline version	Girish Chandra Sabat	Tushar Kanti Adhikary	December 21, 2020
1.10	Policy is amended as per applicable provisions of the Companies Act, 2013 and the relevant rules framed thereunder	Girish Chandra Sabat	Board of Directors	January 27, 2022
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1.30	Updated annexure	Tushar Kanti Adhikary	Board of Directors	April 25, 2024
1.40	Change in Committee Composition	Tushar Kanti Adhikary	Board of Directors	October 21, 2024

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1. Preamble

At PathPartner Technology Private Limited (“PathPartner” or “Company”), we are committed towards social causes and their development. Our Corporate Citizenship commitments are anchored in our core values, our code of Business Ethics and ultimately reflects in the actions of our people. We work to make a sustainable, measurable difference to the communities in which we work and live.

The Company takes a comprehensive approach to Corporate Social Responsibility (“CSR”) that aligns with its enduring values and maximizes the positive change that employees can influence around the world. The Company will strive to operate the business with the highest standards of corporate social responsibility and its CSR policy will be in accordance with the provisions of the Companies Act, 2013.

2. Purpose

The key purpose of this policy is to:

- Define what CSR means to us and the approach adopted to achieve our goals
- Define the kind of projects that will come under the ambit of CSR
- Identify broad areas of intervention in which the company will undertake projects
- Serve as a guiding document to help execute and monitor CSR projects
- Elucidate criteria for partner implementation agencies
- Explain the manner in which the surplus from CSR projects will be treated

3. Policy Statement

The CSR Policy focuses on addressing critical social, environmental and economic needs of the underprivileged and deserving sections of society. We adopt an approach that integrates the solutions to these problems into the strategies of the company to benefit the communities at large and create social and environmental impact.

4. Scope of CSR activities in PathPartner

As a practice, we classify only those projects that are over and above our normal course of business as CSR. This policy applies to all our CSR projects, and it will be further reviewed and updated.

4.1. Normal Course of Business

People are the focus of our continued search for excellence in the provision of our principal offerings: temporary staffing, permanent placement, secondment, outsourcing, outplacement, training and consulting. People, whatever their culture or background, all aspire to a better life and a more rewarding future. We inspire individuals and organizations to create greater choice in the world of work, for the benefit of all stakeholders. As a company, we are committed to providing quality products to our customers, creating economic value for all our shareholders, and we assign high priority to ensuring that we fulfil all regulatory requirements.

5. Goals of PathPartner

5.1. Implementation process: Identification of projects

All projects are identified in a participatory manner, in consultation with the community, literally sitting with them and gauging their basic needs. We recourse to the participatory rural appraisal mapping process. Subsequently, based on a consensus and in discussion with the participating teams, projects are prioritized. Arising from this, the focus areas that have emerged are Education, Health care, Sustainable livelihood, Infrastructure development and espousing social causes.

5.2. Activities mentioned in Schedule VII includes

1. Eradicating extreme hunger, poverty and malnutrition, promoting health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water
2. Promotion of education including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects
3. Promoting gender equality and 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
4. 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.
5. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio- economic development and relief funds for the welfare of the SC/ST/OBC, minorities and women.
6. 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.
7. Measures for the benefit of armed forces veterans, war widows and their dependents
8. Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the central govt.
10. Rural development projects

A) Education

- Formal and non-formal education, adult education
- Scholarships for girls, merit scholarships and technical education for boys
- Distance education
- Girl child education

- Digital literacy / computer education

B) Health care and family welfare

- Pulse polio programme
- Mobile clinics — doctors' visits
- General and multi-specialty medical camps, reproductive and child health care, supplementary nutrition / mid-day meal projects
- Safe drinking water, sanitation — household toilets, community hospitals
- HIV / AIDS, cancer, TB awareness and prevention camps
- Blood donation
- Responsible parenting

C) Social causes

- dowry-less mass marriages
- Insurance schemes
- Culture and sports
- Women empowerment
- Infrastructure development
- Community centres
- Schools in villages
- Health care centres and hospitals
- Roads
- Homes for the homeless
- Rural electrification
- Irrigation and water storage structures

D) Sustainable livelihood

- Self-help groups (microfinance for women and farmers)
- Integrated agriculture development
- Integrated livestock development
- Watershed management
- Microenterprise development

6. Key focus areas of Good & Green in PathPartner

6.1. Greener India

We recognize the fact that in order to truly embed sustainability into our business, it is crucial for us to manage and reduce the environmental impacts of our operations. The Greener India initiative aims to do this through its innovative projects that focus on achieving 5 time-bound goals linked to the Environmental performance of the company.

6.2. Innovating for Good & Green

We define a ‘Good’ service as one which addresses a critical issue for marginalized sections of Society. The issue addressed could be related to health, hygiene, water, sanitation, housing, education or livelihoods. A ‘Green’ product/service is that which reduces energy, GHG emissions, water or material consumption, eliminates toxic materials or uses recyclable, renewable and/or natural material. We continuously undertake efforts to develop good and green products or services. Research & Development activities support incubation and innovation.

6.3. Brighter Giving

We place great emphasis on including our employees in CSR initiatives. To this end, Brighter Giving has been launched as a structured employee volunteering programme that provides our employees with the flexibility to leverage their skills and volunteer for the cause they are passionate about. A typical Brighter Giving project helps address a non-profit organization’s specific needs.

7. Governance Structure

We have constituted a robust and transparent governance structure to oversee the implementation of our CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013 and the rules framed thereunder, as amended from time to time.

7.1. CSR Committee

At PathPartner, our CSR governance structure will be headed by the CSR committee of the Board of directors that will be ultimately responsible for the CSR projects undertaken. The committee will report to our Board of Directors.

7.1.1 Composition of CSR committee:

As per Section 135 of Companies Act, 2013 and the Rules pertaining thereto, a committee of the Board known as “Corporate Social Responsibility Committee” (“CSR committee”) comprising the following members has been constituted:

Sr. No.	Name of Director	Position held in CSR Committee
1	Mr. Rajesh Janwadkar	Chairman
2	Mr. Tushar Kanti Adhikary	Member
3	Mr. Girish Chandra Sabat	Member
4	Mr. Tushar Juvekar	Permanent Invitee (KPIT Representative)

7.1.2. The CSR committee shall act by the following terms of reference:

1. Formulation and recommendation of the CSR policy and annual action plan for each financial year to the Board of Directors (“Board”);
2. Identification of activities to be undertaken by the Company pursuant to Schedule

VII of the Companies Act, 2013;

3. Recommendation of the amount of expenditure on CSR activities as per annual action plan; and
4. Monitor and review the CSR policy from time to time;
5. Evaluation of need and impact assessment, if any, for the projects undertaken by the Company.

7.2. Reporting by the CSR Committee

The CSR Committee will report / give feedback to the Board of directors for all CSR projects undertaken.

The CSR Committee will annually publish a report on the CSR projects as a part of the Board's Report. The report will disclose information in a format as prescribed under Section 135 of the Companies Act, 2013 and the rules made thereunder, as amended from time to time.

8. Execution

The Company shall formulate and execute its CSR Policy under any of the aforesaid initiatives or those stated / amended in the Schedule VII of the Companies Act 2013 ("Schedule VII"), through self-execution by an in-house CSR department or with the support of an implementation partner such as local NGOs, etc.

As per Companies Act, 2013, the Company will contribute a minimum of 2% of its average net profits of the three immediately preceding financial years towards CSR activities. The CSR committee will study, evaluate, assess and recommend to the Board the projects identified and their implementation by the Company. The Company may appoint implementing agencies and if such implementing agencies are appointed, then Company and such implementing agencies will execute the project jointly or severally as recommended by the CSR Committee and approved by the Board as mentioned above

1. **A credible, committed & approved implementing agency, if appointed, will be selected through a due diligence process. As per the CSR norms, they will need a minimum track record of 3 years of consistent and impactful work along with valid required documents and necessary registration/accreditations mentioned in all the applicable statutory requirements as amended from time to time.**
2. **Project evaluation, monitoring and assessment shall be conducted by the third party, if the Company decides.**

9. CSR Budget

The CSR Committee will recommend the total budget for CSR projects along with the specific planned activities for the year which will be aligned with the three CSR focus points. This CSR budget will be approved by the Board.

10. Monitoring Process:

The CSR committee shall:

1. Be responsible for monitoring the implementation of the annual action plan;
2. Evaluate and assess all the projects recommended in terms of the time frame and its social impact;
3. Ensure that if a surplus arises out of CSR activities, the same shall not be a part of the business profit of the Company;
4. Meet at least twice a year to monitor and assess the process, progress, and impact of the various projects undertaken;
5. Update all the information mentioned in point (1) to (4) to the Board of Directors half yearly;
6. Provide a report on the implementation of CSR projects in the prescribed form to the Board annually.

11. Annual Action Plan:

The detailed Annual Action Plan for CSR is specified in Annexure -1 to this policy.

12. Treatment of Surplus

Any surplus generated from CSR projects undertaken by us will be tracked and channelized into our CSR corpus. These funds will be further used in the development of the CSR projects and will not be added to the normal business profits.

13. Information dissemination

The Board of Directors of the Company shall disclose the content of this Policy and make the same available on the Company's website.

Annexure I						
CSR Annual Action Plan FY 2024-25						
Sr. No.	Institute Name	Budgeted Amount (INR)	Project/ Activity	Project Type	Sector	Spent Through
1	Schools	11,35,000/-	Lab and Infrastructure	One time	Education	Direct
2	Engineering Institutes	26,45,000/-	Lab and Infrastructure	One time	Education	Direct
	Total	37,80,000/-				