

LUMINA DATAMATICS LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Title	Corporate Social Responsibility Policy		
Department	Legal & Secretarial & Human Resource	Version	2.0
Date of Effect	April 1, 2014	Revised on	May 25, 2021

Introduction:

Lumina Datamatics Limited [hereinafter referred to as the Company] is a trusted partner to several Fortune 500 companies in the global publishing and retail industries, addressing their needs in content, technology, e-commerce/ e-retail. Company helps its clients improve their business competitiveness and achieve operational efficiency. Company manages end-to-end publishing processes—from content creation till product delivery and provides a competitive edge to increase sales through advanced content solutions, business intelligence with content, and e-commerce/ e-retailing solutions.

Objective:

The Corporate Social Responsibility policy aims to:

- Promote employment-enhancing vocational skills & trainings;
- Provide education, including and encouraging the desire for learning and knowledge at every stage;
- Eradicating extreme hunger, promoting preventive healthcare and sanitation;
- Improving access to basic healthcare facilities for economically weaker sections of society;
- Providing financial and other facilities & assistance to economically weaker sections of the society for medical treatment.
- Environment sustainability, ecological balance, conservation of natural resources.

Applicability:

This policy has been formulated and recommended by the CSR Committee of the Company and adopted by the Board of Directors at its meeting held on May 21, 2015 which was further amended at Board Meeting dated May 25, 2021. The terms, rules and regulations mentioned in this policy are as per Section 135 of the Companies Act 2013 (referred to as “the Act” in this policy) and in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014 and other statutory provisions governing the matter.

This policy shall apply to all CSR projects/ programmes undertaken by the Company in India as per Schedule VII of the Companies Act, 2013.

This policy shall be applicable to Lumina Datamatics Limited including its subsidiaries and includes guiding principles for selection, implementation and monitoring of CSR activities as well as formulation of the annual action plan.

Vision:

Acting responsibly towards the society is a part of the Lumina DNA. Lumina has always been a strong proponent of being socially responsible Company. This approach has culminated in the formation of our Corporate Social Responsibility (CSR) initiative, christened as ‘ASHA’. The CSR policy aims at bringing about a transformation in the quality of life of people through social upliftment and similar such programs. The CSR vision of Datamatics involves ongoing commitment by business towards Employability, Education, Health and Environment with objective to contribute to the economic and social development of society at large.

Datamatics CSR activities:

The Company’s CSR activities will focus on the following sectors and issues:

❖ Employability	❖ Education & Training
❖ Health	❖ Environment

CSR Committee:

1. The CSR Committee will consist of three or more directors of which atleast one will be an independent director.
2. The CSR Committee shall meet as and when deemed necessary.
3. The CSR Committee may invite Executives, Advisors, representatives of Social Organizations, Auditors of the Company and such other person (s) as it may consider necessary to attend the meeting.

Areas / Localities to be covered

The Company shall give preference to the local area and the areas around it where it operates, for spending the amount earmarked for CSR activities. On need basis, the CSR activities could be extended to any area of the Country.

CSR Activities:

The Company will constantly endeavor to identify focus areas in line with its Vision and may include any one or more of the activities mentioned under Schedule VII of the Companies Act,

2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014, including but not limited to:

1. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and providing financial and other facilities & assistance to economically weaker sections of the society for medical treatment;
2. Promoting education, including special education and imparting training, employment enhancing vocational skills and livelihood enhancement projects;
3. Promoting gender equality, empowering women, setting up measures for reducing inequalities faced by socially and economically backward groups;
4. 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;
5. Such other matters as may be notified by Ministry of Corporate Affairs from time to time for this purpose.

The CSR Committee and the Board of Directors shall be authorized to consider any other CSR activities which will be permissible under the provision of the Companies Act, 2013 or Rules framed thereunder from time to time, including any modifications thereto.

The following CSR projects or programs or activities are **not considered** as CSR activities pursuant to the provisions of the Companies Act, 2013:

1. activities undertaken in pursuance of normal course of business of the Company;
2. any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
3. contribution of any amount directly or indirectly to any political party under section 182 of the Companies Act, 2013;
4. activities benefitting employees of the Company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
5. activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services;
6. activities carried out for fulfilment of any other statutory obligations under any law in force in India.

CSR Expenditure:

The total expenditure for the CSR projects will be in compliance with the provisions of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility) Rules, 2014, recommended by the CSR Committee and approved by Board and in accordance with goals and priorities identified for each of the key focus areas by the CSR Committee.

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 development of the CSR projects and will not be added to the normal business profits.

Guiding Principles For Selection Of CSR Activities And Annual Action Plan

- **Identification Process**

Identification of programs at Corporate and Unit Level will be done by means of any one or more of the following:

1. Need identification studies, if deemed necessary.
2. Receipt of proposals/requests from various agencies, district administration/ local govt. etc.
3. Discussions and request with local representatives/Civic bodies/Citizen's forums/voluntary organizations.
4. Discretion of the CSR Committee and / or the Board of Directors.

- **Approval Process**

The CSR Committee may form a sub-committee comprising of CSR warriors amongst its employees for the purpose of identification, approval, execution and implementation CSR programs of the Company under this Policy.

- **Annual Action Plan**

The CSR Committee will, in pursuance of the CSR policy, formulate and recommend to the Board, an annual action plan which shall include the following, namely: -

1. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
2. the manner of execution of such projects or programmes;
3. the modalities of utilization of funds and implementation schedules for the projects or programmes;
4. monitoring and reporting mechanism for the projects or programmes; and
5. details of need and impact assessment, if any, for the projects undertaken by the Company;

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

Guiding Principles For Execution Of CSR Activities

- **Modalities of Execution/ Implementation:**

CSR activities should be undertaken by the Company in accordance with CSR Action Plan, which, as stated above, will be annually recommended by the CSR Committee and approved by

the Board.

The CSR activities may be undertaken and / or implemented by the Company itself or through implementation agencies as may be permissible under the provisions of the Act and the Companies (Corporate Social Responsibility) Rules, 2014. Basic criteria, as prescribed by the Act will be ensured for programme execution.

Implementation is the responsibility of the CSR Committee and its sub-committee / team. The activities which are identified and mentioned in CSR policy will be undertaken and fulfilled to the best possible extent. The time period of each activity will depend upon its sector, the extent of its coverage and the allocated budget on the activity. Depending on the time period of each activity, required significance will be given to the activities.

Monitoring and Reporting CSR Activities:

To ensure effective implementation of the CSR activities undertaken, a monitoring mechanism will be put in place by the Corporate HR / Unit HR head. The same will be in accordance with CSR Action Plan, which, as stated above, will be annually recommended by the CSR Committee and approved by the Board.

The CSR Committee will receive periodic updates on progress reports of CSR activities of the Company.

The Board of Directors shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to that effect.

In case of ongoing project, the Board of Directors shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

A separate chapter / annexure needs to be included in the Annual Report of the Board of Directors on implementation of CSR activities including the particulars prescribed under the Companies (Corporate Social Responsibility) Rules, 2014.

Impact Assessment

The HR department at the Corporate Office will conduct impact studies on a periodic basis, by itself or through independent professional third parties / professional institutions, especially on the **strategic** and high value programs, if statutorily applicable.

The same will be in accordance with CSR Action Plan, which, as stated above, will be annually

recommended by the CSR Committee and approved by the Board.

The monitoring team will also try to obtain feedback from beneficiaries about the activities.

Appropriate documentation of the CSR Policy, CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis.

General

The composition of the CSR Committee, this Policy and Projects approved by the Board of Directors shall mandatorily be disclosed on the website of the Company. Further, The Board's Report shall include an annual report on CSR containing particulars as prescribed statutorily.

In case of any doubt or difficulty with regard to any provision of this policy or implementation of any CSR activity and also in respect of matters not covered herein, a reference be made to CSR Committee. In all such matters, the interpretation and decision of the CSR Committee shall be final.

In case of any inconsistency in this CSR Policy and the Act read with the CSR Rules, the provisions of the Act and the CSR Rules would prevail.

The Board of Directors of the Company based on recommendation of the CSR Committee, may review and alter or amend any of the provisions of this Policy from time to time. Any or all provisions of this Policy would be subject to the revision/amendment in accordance with the Companies Act, 2013 and Rules made thereunder, Schedule VII, Notifications etc. on the subject as may be issued by Ministry of Corporate Affairs, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Recommended By:

Sd/-
Babu Thoppil
Head HR – India

Approved By:

Sd/-
Sameer Kanodia
Managing Director & CEO