

SAFESEND TECHNOLOGIES PRIVATE LIMITED

Corporate Social Responsibility (CSR) Policy

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Nomenclature

STPL	Refers to SafeSend Technologies Private Limited
CSR	Corporate Social Responsibility

1. Policy statement

STPL believes in shared responsibility to do business in ways that respect, protects and benefits their customers, employees, communities and environment. STPL corporate responsibility lies in sharing skills and resources with the communities where they live, work and do business. As a continuing effort to serve and strengthen the communities, STPL undertakes citizenship initiatives including charitable contribution to qualifying and registered charities and encouraging employee volunteering.

STPL embraces diversity and actively focuses on inclusion from the perspective of gender, LGBT and people with disability in the workplace.

As an on-going effort to address the critical social, environmental and economic needs of the sections of the society, the Company has set out this Policy in compliance with Section 135 of the Companies Act, 2013 read with its applicable Rules and Amendments, thereof.

STPL provides solutions and propositions catering to all types of tax preparation – both Individuals and Corporations, including large and small CPA firms. The CSR activities that the Company will undertake will exclude services that form STPL business as usual.

2. Objective of the Policy

The objective of STPL CSR Policy is to set forth the Company's CSR as stipulated in the Section 135 of the Companies Act, 2013 and the rules thereof. This Policy identifies and formulates the

broad areas that the Company shall pursue towards fulfilling its CSR obligations and serves as a guiding document to plan, identify, implement and monitor CSR initiatives.

3. Focus areas of CSR

STPL India has adopted a structured approach to manage its CSR obligations. STPL India's CSR activities are aligned with Schedule VII of the Companies Act 2013 with the focus on the following:

3.1. Education and vocational training

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

3.2. Gender equality and livelihood enhancement

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.

3.3. Environmental sustainability

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.

3.4. Contribution to technology incubators

Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government

3.5 Health and other Welfare

Promoting health care including preventive health care and rural sanitation.

In pursuance of this Policy, STPL may choose to undertake CSR activities as per the provision of the law, on approval by the Board of the Company.

4. Governance structure

The Company has constituted a robust and transparent governance structure to oversee the implementation of the CSR Policy. The structure and responsibilities have been described below:

4.1. Board of Directors

The Board of Directors of the Company will set and drive the CSR agenda for the Company as per the provision of the law. They will be responsible for approval of the Policy and its display on the Company's website and to report on CSR activities in the annual report. They are responsible to ensure that the CSR activities taken up by the Company are in line with Schedule VII of the Act.

4.2. CSR Committee of the Board

The Company will constitute the CSR committee as per the requirement and applicability given under Sub-section 9 of Section 135. The CSR Committee will select and approve CSR activities

in line with the CSR Policy for the consent of the Board. The CSR Committee will make recommendations to the Board regarding the content of the Policy, the activities to be undertaken as a part of the Company's CSR, and the expenditure towards those activities. The committee will institute a transparent monitoring mechanism for implementation of CSR activities undertaken by the Company.

4.3. CSR Working Group

The CSR Committee of the Board shall be supported by CSR Working Group composed of member representatives from different locations and functions of the Company. The CSR Working Group supports the implementation, monitoring and evaluation of CSR activities undertaken by the Company. The Group will be responsible for ensuring smooth execution of the projects undertaken by the Company.

5. CSR implementation

The Company may implement its CSR activities directly or through an implementation agency. The implementation agency will be a registered trust or registered society, or Company established under section 8 of the Companies Act 2013 carrying FCRA certification with established track record of at least three financial years. The Company may also choose to collaborate with other entities of STPL or with other corporates for carrying out its CSR.

Those CSR projects are accorded preference that conform to the requirements of Section 135 of Companies Act 2013, which can engage employees of the Company, are located in proximity to areas of operation and integrate with STPL core corporate responsibility programs (including Matching Gifts and Dollars for Doers).

6. CSR budget

The Board of the Company will strive to spend at least two percent of the average net profits of the Company made during the three immediately preceding financial years; where the ‘net profit’ is calculated as mentioned in Section 198 of the Companies Act 2013. The CSR Committee is entitled to recommend a higher amount than that specified in the Companies Act 2013 based on financial and other considerations for the purposes of CSR activities.

Any surplus generated from CSR activities undertaken by the Company shall not form the business profit of the company.

7. Amendments to the Policy

This Policy will be reviewed periodically by the CSR Committee for effectiveness and compliance with the regulations, as necessary. Any amendments or modifications to the Policy will be approved by the Board of the Company.

Initialed by Chairman: _____
Prfull Kumar Trivedi
DIN: 03286666
Director