

iCloudHomes Private Limited
CORPORATE
SOCIAL
RESPONSIBILITY
POLICY



This Corporate Social Responsibility Policy (“the CSR Policy”) has been framed by iCloudHomes Private Limited (the Company) in accordance with the Section 135, Schedule VII of the Companies Act, 2013 and CSR Rules issued by the Ministry of Corporate Affairs on February 27, 2014.

Unless the context otherwise requires, the definitions mentioned in the notification dated February 27, 2014 and Companies Act 2013, shall apply to this CSR Policy.

COMPANY PHILOSOPHY FOR CSR POLICY

Companies Act, 2013 has formally introduced the Corporate Social Responsibility to the dash board of the Indian Companies. Legal framework of CSR is an edge to Corporate Charitable / reformative approach towards the society to which the corporate belongs to. By introducing the separate section for CSR in Companies Act, 2013, the Government has given legal recognition to their community development approach.

The company believes in “looking beyond business” and strives to create a positive impact on the communities it serves and on the environment. The company is committed not just to profits, but also towards leaving a deeper imprint on the society as a whole. We understand that there is a need to strike a balance between the overall objectives of achieving corporate excellence vis-à-vis the company’s responsibilities towards the community.

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

The company has constituted Corporate Social Responsibility Committee (“the Committee”) comprising of following two directors and a member.

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| 1. Biju Janardhanan, Managing Director | - Chairman |
| 2. Sheeja Biju, Director | - Member |
| 3. Sreekumar J., Sr.GM (F&A) | - Member |

Board of Directors of the company may re-constitute the committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The committee shall exercise powers and perform the functions assigned to it by the Board of Directors of the company pursuant to section 135 of the Companies Act, 2013 and CSR Rules notified with regard thereto.

CSR ACTIVITIES

Pursuant to Schedule VII of the Companies Act, 2013, the committee has approved the following activities as “CSR Activities” to be undertaken under the CSR policy of the company. The Board of Directors has reviewed the said activities and expressed its consent to the committee to pursue the said activities under CSR policy of the company under section 135 of the Companies Act, 2014, Schedule VII and other applicable rules, regulations, notifications etc., issued / to be issued from time to time.

APPROVED CSR ACTIVITIES

1. Promoting preventive healthcare and sanitation to the public.
2. Promoting education, including primary, secondary and higher secondary education, as well as special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
3. Projects, activities, programs relating to conservation of natural resources including renewable energy sources, social forestry etc.
4. Projects, activities, programs relating to water conservation and maintaining quality of soil, air, and water.
5. Promoting gender equality and empowerment of women.
6. Community Health- Innovation projects to meet local needs. Reaching out with basic health care to all (bridging the gap).
7. Sustainable livelihood projects – Holding hands of all marginalized group to improve livelihood opportunity, thus improving their quality of life.
8. Rural infrastructure development- Need based quality infrastructure to improve quality of life.

9. 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 arts and handicrafts.
10. Measures for the benefit of armed forces veterans, war widows and their dependents.
11. Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports.
12. Contribution to the 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 scheduled castes, the scheduled tribes, other backward classes, minorities and women.

EXCLUSIONS

The CSR activities shall be undertaken by the company in accordance with this policy and shall exclude activities undertaken in pursuance of its normal course of business.

- 1) Subject to the provisions of section 135(5) of the Act, the CSR projects or programs or activities undertaken in India only shall qualify for CSR expenditure.
- 2) The CSR programs or projects or activities that benefit only the employees of the company and their families shall not be considered as CSR activities in accordance with the Act.
- 3) Contribution of any amount directly or indirectly to any political party under section 182 of the Act shall not be considered as CSR activity.

BUDGET FOR CSR ACTIVITY & CSR EXPENSE

The company shall allocate the budget for CSR activities. The minimum budgeted amount for a financial year shall be 2% of the average net profit of three immediate preceding financial years. The company may allocate more fund / amount than the amount prescribed under section 135 of the Companies Act, 2013, for the CSR activities for any financial year. The committee shall calculate the total fund for the CSR activities and recommend to the Board for the approval. The Board shall approve the total fund to be utilized for CSR activity for respective financial year.

CSR expenditure shall include all expenditure including contribution to corpus for

projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the approved CSR activities.

IDENTIFICATION OF ACTIVITIES / PROJECTS

Out of approved CSR activities, the committee shall decide which activity / project should be given priority for the respective financial year. While arriving at the decision of the activity to be undertaken for the respective year, the Committee shall analyse the basic need of the community / area in which the organisation operates or at the place where its registered office is situated. The committee shall record its findings and prioritise the CSR activities.

IMPLEMENTATION PROCESS

After prioritising the activity the committee shall finalise the detailed implementation project / program, including planning for expenses against the total budget allocated for CSR activities.

The company may build CSR capacities of their own personnel as well as those of their implementing agencies through institutions with established track records of at least three financial years but such expenditure including expenditure on administrative overheads shall not exceed five percent of total CSR expenditure of the company in one financial year.

ORGANISATIONAL RESPONSIBILITY

At organisational level for implementation of agreed CSR activity, the committee may constitute an implementation team or authorise any of the Department of the Company to organize for the implementation of the CSR activity. The team or respective department shall monitor the implementation process from time to time, on behalf of the CSR committee and place a report to the committee regarding the progress of the activity implementation, on a quarterly basis. The respective department or implementation team would be responsible for reporting of any irregularity to the committee on immediate basis.

The CSR policy and activities shall be prominently uploaded on the company's website and all its social media platforms.

MONITORING BY THE BOARD

The Board of Directors shall constantly monitor the implementation of the CSR activities. The CSR committee shall place a progress report, including details of expenses, before the Board on quarterly basis. The Board shall review the same and suggest recommendation, if any, to the committee with regard to implementation process.

COMPLIANCE AND REPORTING TO BOARD

The committee is responsible to undertake CSR activities as per the approved CSR policy. Apart from quarterly reporting to the Board about the implementation of CSR activity, a detail report containing the implementation schedule, total budget allocated, actual expenses incurred, surplus arising if any, results achieved, further work to be done in the concerned CSR activity, recommendations for the CSR activities for next year etc. should be placed before the Board for its consideration. Any surplus arising out of the fund allocated for CSR activity shall not be the part of the business profit of the company.

MANAGEMENT COMMITMENT

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterised by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy. Our Corporate Social Responsibility policy conforms to the relevant section of the Corporate Social Responsibility, Rules made under Companies Act, 2013 and amendment(s) to be made thereto in future.

