



Trust Fintech Limited

(Formerly Known As Trust Systems & Software (I) Ltd.)

CIN: U72100MH1998PLC117470

info@softtrust.com | www.softtrust.com

CORPORATE SOCIAL RESPONSIBILITY POLICY OF TRUST FINTECH LIMITED

[This Corporate Social Responsibility (hereinafter referred to as 'CSR') Policy is framed in terms of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time].

Introduction:

Trust Fintech Limited (TFL) is a socially committed organization and a socially responsible corporate citizen. It attaches great importance in discharging its overall social responsibilities to the community and the society at large. The company's vision is to actively contribute to the social and economic development of the communities in which it operates so as to make positive impact on the society. In the present context, CSR means not only investment of funds for social activities but also integration of business processes with social processes. Apart from commercial objectives, the Company is eager to adopt corporate social responsibility ("CSR") initiatives.

1. SCOPE AND APPLICABILITY:

This Policy shall be applicable to all CSR initiatives undertaken by TFL in pursuance of the requirements of Section 135 and Schedule VII of Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (including any statutory modifications, amendments, or re-enactments of any of them for the time being in force). This Policy covers the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities

2. OBJECTIVE OF CSR POLICY

The objective of this Policy is to continuously and consistently:

- identifying the areas of CSR activities;
- recommending the amount of expenditure to be incurred on the identified CSR activities;
- implementing and monitoring the CSR policy of the company from time to time;
- formulating a CSR annual action plan and recommending it to the board; reviewing Company's initiative and programs;

Regd. Office: 11/4, I.T. Park, Gayatri Nagar Parsodi, Nagpur Maharashtra, India, 440022 Ph- +91(721) 2221656

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- coordinating with other agencies in implementing programs and executing initiatives as per CSR Policy.

3. POLICY GUIDELINES

- All CSR Projects must be aligned as prescribed in Schedule VII of the Companies Act, 2013.
- CSR projects or programmes must not include the initiatives undertaken in pursuance of normal course of business of the Company.
- Projects or programmes that benefit only the employees of the Company shall not be considered as CSR activity.
- Contribution of any amount directly or indirectly to any political party shall not be considered as CSR activity.
- Activities carried out for fulfilment of any other statutory obligations under any law in force in India will not qualify towards CSR requirements.
- Any term not defined above, shall have the meaning assigned to it under the Act or the CSR Rules.

4. COMPOSITION OF CSR COMMITTEE:

The Corporate Social Responsibility Committee has been formed by the Board of Directors, at the meeting held on January 6, 2024. As on 1st April 2024 in compliance with Section 135 of the Companies Act 2013, the Corporate Social Responsibility Committee comprises of:

Name of the Director	Designation in Committee	Nature of Directorship
Mr. Hemant Chafale	Chairperson	Managing Director
Mr. Heramb Damle	Member	Whole time Director
Mr. Kapil Dilip Chandrayan	Member	Non Executive Independent Director

The Company Secretary and Compliance officer of Company will act as the Secretary of the Committee.

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5. MEETINGS OF THE COMMITTEE:

For smooth functioning of the Committee, the members shall meet as below to discuss such matters and to take such decisions as may be necessary from time to time.

- a. The CSR Committee shall hold a minimum number of two meetings in a year.
- b. The members of the Committee may mutually agree between them regarding time and place for the said meetings.
- c. The quorum for the CSR Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.
- d. The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio visual means as may be convenient.

6. POWERS AND FUNCTIONS OF CSR COMMITTEE:

To effectively implement the objectives of the Company with respect to CSR, the Committee is vested with the following functions and powers:

- a. Formulate CSR Policy and recommend the same to the Board of Directors of the Company for approval.
- b. Recommend CSR activities as stated under Schedule VII of the Act.
- c. Approve to undertake CSR activities, if necessary, in collaboration with group companies/other Companies/firms/NGOs etc. and to separately report the same in line with the CSR Rules.
- d. CSR Projects need to be identified and planned for the approval of CSR Committee, with the estimated expenditure and phase wise implementation schedules.
- e. Recommend the CSR Budget.
- f. Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules.
- g. Create transparent monitoring mechanism for implementation of CSR initiatives in India.
- h. Submit the Reports to the Board in respect of the CSR activities undertaken by the Company.

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- i. Monitor and review CSR Policy from time to time in the light of emergent situation and statutory framework.
- j. Authorize executives of the Company to attend the CSR Committee Meetings, if necessary.

7. CSR INITIATIVES:

Pursuant to Schedule VII of the Act and the CSR Rules, the Company shall undertake CSR activities included in its Annual CSR Plan, as recommended by the CSR Committee at the beginning of each year. The Committee is authorized to approve any modification to the existing Annual CSR Plan or to propose any new program during the financial year under review.

8. CSR EXPENDITURE:

a) The Company shall spend at least 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years in pursuance of its Corporate Social Responsibility Policy, in accordance with the Act and the Rules and the CSR Policy.

b) The CSR Committee shall recommend the manner in which the CSR Expenditure shall be incurred in a year, in accordance with the Act and the Rules and the CSR Policy.

c) The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors 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 stated under Schedule VII of the Act.

d) Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company.

9. FAILURE TO SPEND THE CSR MONEY:

If the Company fails to spend the required amount in a particular financial year, it is the duty of the Committee to submit a report in writing to the Board of Directors specifying the reasons for not spending the amount, which in turn shall be reported by the Board of Directors in their Annual Report pertaining to that particular Financial Year. Surplus, if any, arising out of the CSR projects or programs or activities shall not form part of the business profit of the company.

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10. COLLABORATION:

It is expressly allowed under the CSR Rules that the Company may collaborate with any other Company or association formed in this regard subject to approval by CSR Committee, to implement CSR activities and the same shall form a part of the Annual CSR Plan.

11. REPORTING AND PUBLICATION OF CSR POLICY:

The Board shall review the implementation of CSR activities from time to time.

As per the CSR Rules, the contents of the CSR Policy shall be included in the Directors' Report and the same shall be displayed on the Company's website.

12. POLICY REVIEW AND FUTURE AMENDMENT:

The administration of the CSR Policy of the Company and the execution of identified CSR projects, programs and activities under it shall be carried out under the control and overall supervision of CSR Committee.

The Board of Directors may revise/ amend this CSR Policy based on the recommendations of the CSR committee or to bring the same in line with the guidelines or amendments issued from time to time by Government on the subject. Further, any subsequent amendment/modification in the Companies Act, 2013 read with Rules made thereunder and/or any other laws in this regard shall automatically apply to this Policy.

For and on Behalf of Trust Fintech Limited

Sd/-

Hemant Chafale
Managing Director &
Chairperson of CSR Committee
DIN: 01590781

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