



SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

CORPORATE SOCIAL RESPONSIBILITY POLICY

Effective Date: July 19, 2021
Approval Date: July 19, 2021
Revision Dates: February 06, 2023, July 21, 2025, March 20, 2026
Version: 4.0
Recommended By: Corporate Social Responsibility Committee
Approved By: Board of Directors



SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

PREFACE

The objective of Corporate Social Responsibility Policy ('CSR Policy' or 'Policy' as the context may require) is to lay down the statement containing the approach and direction given by the Board of Directors ("the Board") of Share India AlgoPlus Private Limited ('the Company'), after taking into account the recommendations of its Corporate Social Responsibility Committee ('CSR Committee' or the 'Committee') and to specifically provide for guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan for undertaking Corporate Social Responsibility ('CSR') activities. This Policy is formulated in compliance with the requirements of Section 135 of the Companies Act, 2013 ('Act') read with the Companies (Corporate Social Responsibility) Rules, 2014 ('Rules').

OVERVIEW

Our Company is a socially responsible corporate citizen. Our Company recognizes trusteeship as a critical function of an organization in discharging its responsibility towards the society, environment and its resultant ecosystem. Our Company is committed to supporting sustainable development in identified societies through effective interventions at various levels. Broadly the focus of CSR activities of the Company includes inter alia Education, Health and Hygiene, Environment, Arts, Sports & Culture and Relief to underprivileged.

CSR VISION

Our Company contributes for education, rural development, environment sustainability and also improvement of the Community to enable them to live a better life which is more hygienic, healthy and economically sustaining.

CSR MISSION

The mission of our Company is to provide basic education to children who are under privileged, excluded and marginalized communities in building their capacity for coping with the dynamic socio-economic scenario, to avail equal opportunities and benefits within the society.



SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

OBJECTIVES

The Objectives of this CSR Policy are:

- a) To establish guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.
- b) To ensure that the CSR activities are undertaken in compliance with the provisions of Section 135 of the Act, read with the Rules thereunder, as may be amended from time to time.

CONSTITUTION OF CSR COMMITTEE

The Corporate Social Responsibility (CSR) Committee of the Company is duly constituted in accordance with the provisions of Section 135 of the Companies Act, 2013, read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

FREQUENCY OF THE MEETINGS OF THE CSR COMMITTEE

- The CSR Committee shall meet at least twice in a year or at such periodic intervals as may be required. Members of the CSR Committee can agree upon mutually regarding time and place for the said meetings.
- Quorum for the meeting should be majority of the members.
- The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio-visual means in accordance with the provisions of the Act and rules made there under from time to time.

ROLE OF CSR COMMITTEE

The CSR Committee will play the following role in fulfilling the Company's CSR objectives:

- Formulate CSR Policy and identify activities to be undertaken as per Schedule VII of the Companies Act, 2013 towards CSR initiatives.
- Recommend the CSR Policy to the Board of the Company for its approval.



Share India Algo Plus

SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

- Formulate and recommend to the Board, an annual action plan in pursuance of this CSR policy
- Recommend the CSR expenditure/CSR Budget.
- Spend the allocated CSR amount on the CSR activities once it is approved by the Board of the Company in accordance with the Act and the CSR Rules.
- Formulation of a transparent monitoring mechanism for ensuring implementation of the projects/ programmes / activities proposed to be undertaken by the Company or the end use of the amount spent by it towards CSR activities.
- Regularly monitor and implement CSR Policy from time to time.
- To facilitate impact assessment of the CSR projects, if required.
- Quarterly report to the Board, the status of the CSR activities and contributions made by the Company.
- Change/modify/review the CSR policy as per requirement.
- To carry out any other requirements mandated under the Act and Rules issued thereto.
- Authorize executives of the Company to attend the CSR Committee Meetings.
- To adhere and comply with the general or specific directions issued by the Central Government for the compliance with the provisions of law relevant to CSR obligations of the Company.

ROLE OF BOARD OF DIRECTORS

- Approve CSR Policy, after taking into account the recommendations made by the Corporate Social Responsibility Committee, which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Act.
- Ensure that activities included in the CSR Policy of the Company are undertaken by Company.
- Ensure that the Company spends, in every financial year, at least two per cent. of the average net profits made during the three immediately preceding financial years.
- Any other matter/thing as may be considered expedient by the members in furtherance of and to comply with the CSR Policy of the Company.



Share India Algo Plus

SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

TREATMENT OF UNSPENT CSR AMOUNT

In case the Company is not able to spend the minimum statutory amount towards CSR activities during the financial year, the unspent amount shall be treated in the following manner:

a. If it relates to an ongoing project –

Ongoing project means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.

The Company shall transfer such amount to an unspent CSR account within a period of 30 days from the end of the financial year to which such amount relates. Such amount shall be spent by the Company in pursuance of this Policy within a period of 3 financial years from the date of such transfer.

If the Company still fails to spend such an amount, then the Company shall transfer the same to a fund specified in Schedule VII to the Act, within a period of thirty days from the date of completion of the third financial year.

b. If it does not relate to an ongoing project-

The Company shall transfer such an amount to a fund specified in Schedule VII within a period of 6 months from the end of financial year.

The Board shall also record the reasons for not spending the CSR amount towards CSR projects, both ongoing and other than ongoing, in its board report.

TREATMENT OF THE AMOUNT WHICH IS SPENT IN EXCESS OF THE CSR REQUIREMENT

If the CSR expenditure in a financial year exceeds the statutory limit, then excess amount spent may be set off against the CSR expenditure of the Company for the next three financial years with the approval of the Board by way of a resolution, on the recommendation of the CSR Committee. Such an excess amount available for set off shall not include the surplus arising out of the CSR activities.



Share India Algo Plus

SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

SURPLUS FROM THE CSR ACTIVITIES

Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be

1. ploughed back into the same CSR project; or
2. transferred to the Unspent CSR Account and spent in pursuance of the CSR Policy and annual action plan of the Company; or
3. transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year in which the surplus is generated.

GUIDELINES FOR SELECTION, IMPLEMENTATION, MONITORING AT SHARE INDIA ALGOPLUS PRIVATE LIMITED

The provisions of Schedule VII to the Companies Act, 2013, including amendments thereunder, require companies to direct their CSR initiatives towards the areas stated therein. In line with these requirements, the Company will inter alia focus on:

A. Education:

- Conservation and renovation of school buildings and classrooms
- Donations to schools, colleges, universities or any other educational institution for conservation of buildings and renovation of classrooms would qualify as “promoting education” and hence eligible for compliance of companies with Corporate Social Responsibility.
- Donations to schools, colleges, universities or any other educational institution for conservation of buildings and renovation of classrooms would qualify as “protection of national heritage, art and culture, including restoration of buildings and sites of historical importance” and hence eligible for compliance of companies with CSR.
- Monetary contributions to academic and other institutions with the objective of assisting students in their studies.
- To provide Education Kit comprising study material, uniforms etc. to the poor students of Govt. Schools.
- To extend support /educational assistance to children from financially backward families and underprivileged community as part of the company's social responsibility.



Share India Algo Plus

SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

- To provide cash awards to students studying in School/Colleges and has secured high academic / professional records.
- To provide financial assistance to organizations working on the similar objective.

B. Providing Healthcare including Preventive Health care

C. Helping in Rural Development and Education

D. Ensuring Environment Sustainability

E. Such other activities in compliance with Schedule VII to the Companies Act, 2013 including Rules made thereunder, as may be amended from time to time.

OUTLAY TOWARDS CSR ACTIVITIES

- i. The Company in every financial year, shall spend at least 2 % (two percent) of the average net profits of the Company made during the 3 immediately preceding financial years, or such other percentage or amount as may be prescribed by law from time to time, specifically towards CSR activities.

For this purpose, the net profit shall be calculated in accordance with the provisions of the Companies Act, 2013, including rules made thereunder and amendments thereof.

- ii. Any surplus arising out of any of the CSR activities carried out by the Company will not be treated as part of the business profits of the Company.
- iii. Where the Company in any financial year spends an amount in excess of the requirement of aforesaid 2%, such excess amount can be set off as per the provision of the Companies Act, 2013 and Rules issued thereunder, as may be amended from time to time.



SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

IMPLEMENTATION OF CSR ACTIVITIES

- i. CSR activities shall be carried out through directly by company or through section 8 company, NGOs, etc.
- ii. Based on the net profits, or net worth or turnover, if any, every year, the CSR Committee will identify the CSR activities including the thrust areas, annual budget, planned expenditure and implementation schedule etc.
- iii. The preference for CSR activities shall be given to the local areas where registered office of the Company is situated.
- iv. However, this shall not bar the Company from pursuing its CSR activities in any other areas.

CSR IN COLLABORATION OR THROUGH A MEDIUM / IMPLEMENTING AGENCY

The Board, through the CSR Committee, shall ensure that the CSR activities shall be undertaken/ executed/ implemented either by the Company itself and/ or through Implementing Agencies (IAs).

In case of direct implementation, the Company may directly contribute the CSR funds to the beneficiary in accordance with the provisions of the Act.

The following may act as an IA for undertaking CSR activities of the Company –

- a) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the Company, either singly or along with any other company; or
- b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- c) any entity established under an Act of Parliament or a State legislature; or
- d) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered



Share India Algo Plus

SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

The Company shall ensure that the IAs engaged by the Company are duly registered with the Ministry of Corporate Affairs.

The Company may also collaborate with other companies for undertaking their CSR projects/ programmes/ activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with the CSR Rules.

The Company shall endeavor to undertake appropriate documentation of the Company's CSR activities, its executing partners, and expenditure entailed shall be undertaken on a regular basis. MoUs/agreements may shall be executed with IAs qualified to undertake CSR activities under the Act with clear project outlines, deliverables, timelines and budget.

For the purpose of determining the authenticity and genuineness of the IAs/ beneficiary, the Company may obtain such documents as may be necessary, which may include the following –

- Charter documents of the IA / beneficiary organization;
- Layout of project plan with estimated cost time with milestones involved;
- Audited financials of the IA / beneficiary organization, etc.

GOVERNANCE, MONITORING AND EVALUATION MECHANISM

The Company may engage international organisations for designing, monitoring and evaluation of the CSR projects or programmes as well as for capacity building of their own personnel for CSR.

CSR COMMITTEE-LEVEL MONITORING

The CSR Committee will ensure a transparent monitoring mechanism for ensuring effective implementation of the CSR activities proposed to be undertaken by the Company.

The CSR Committee will monitor the projects and programmes to ensure that they are being carried out in compliance with this CSR Policy, annual action plan and the Act. The CSR Committee shall on a quarterly basis apprise the Board about the progress of CSR project/programmes/activities including expenditure incurred by the implementing agency(ies) till the allocated budget is fully utilized.



Share India Algo Plus

SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

BOARD-LEVEL MONITORING

Every year the CSR Committee will place, for the approval of the Board of the Company, a CSR annual action plan delineating the CSR programmes to be carried out during the financial year, including the budgets thereof, their manner of execution, implementation schedules, modalities of utilization of funds, and monitoring & reporting mechanism.

The Board will consider and approve the CSR annual action plan with such modifications that may be deemed necessary. The CSR annual action plan may also be modified by the Board during the financial year, on the recommendation of the CSR Committee.

In case of the ongoing project(s), the Board 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.

The Board shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it.

IMPACT ASSESSMENT

The Company shall undertake impact assessment, through an independent agency, of its CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study, if the average CSR obligation of the Company is ten crore rupees or more, in the three immediately preceding financial years.

The impact assessment shall be done by an independent external agency appointed by the Board.

The impact assessment report(s), if any, shall be placed before the Board and shall be annexed to the annual report on CSR as per the provisions of law.

The Company may, for undertaking the impact assessment, book the expenditure towards CSR for that financial year, which shall not exceed two percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is higher.



Share India Algo Plus

SHARE INDIA ALGOPLUS PRIVATE LIMITED

(A WHOLLY OWNED SUBSIDIARY OF SHARE INDIA SECURITIES LIMITED.)

DISCLOSURES

The Company shall, in addition to other disclosure requirement under the Act / Rules, also disclose this Policy on its website and a web-link thereto shall be provided in the annual report on CSR activities.

AMENDMENT

The CSR Committee shall review the CSR Policy from time to time based on the changing needs and make suitable modifications as may be necessary with the approval of the Board.

In the event of any conflict between the provisions of this Policy and the Act or any other statutory enactments or rules, then the provisions of the Act or any other statutory enactments or rules shall prevail over this Policy. Further, in case of any subsequent amendment(s), clarification(s), circular(s), etc., issued by the relevant authorities, are not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc., shall also prevail over the provisions of this Policy and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.
