

Corporate Social Responsibility NuSummit Group of Companies

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1 Purpose

NuSummit Technologies is committed to making a meaningful difference in society. This Corporate Social Responsibility Policy outlines our approach to creating positive social impact through focused initiatives, responsible implementation, and transparent governance, in line with regulatory requirements.

2 Effective Date

This policy is effective from 1st November, 2025.

3 Scope

Applicable to all CSR activities undertaken by NuSummit Group of Companies across India, either directly or in partnership with accredited CSR foundations and agencies.

4 Authority and Approval

The company management reserves the right to revise, amend or modify this policy at any time. HR team would be responsible for maintaining and carrying out subsequent changes / modifications in this policy and communicate appropriately.

5 Policy

5.1 CSR Compliance Commitment:

In alignment with Section 135 of the Companies Act, 2013 and its associated rules, NuSummit Technologies will ensure full compliance with the legal framework governing Corporate Social Responsibility. As part of this commitment, NuSummit will:

- Constitute a CSR Committee (if applicable), as per the prescribed guidelines.
- Allocate and spend at least 2% of the average net profits earned during the three immediately preceding financial years on CSR initiatives.
- Ensure that administrative overheads do not exceed 5% of the total CSR expenditure for the financial year.

This approach reflects NuSummit's dedication to responsible corporate citizenship and sustainable community development.

5.2 CSR commitment and Vision:

NuSummit CSR Focus Areas – The 3 Es

Education – Building Capability, Skills & Innovation

NuSummit will support initiatives that promote **education, skill development, and innovation** to enhance employability and long-term societal progress.

This includes:

- Access to **quality education**, including special education and learning for disadvantaged groups
- **Vocational, digital, and employment-enhancing skills** development
- Support to **research, innovation, and entrepreneurship**, including contributions to incubators, R&D projects, public-funded universities, IITs, national laboratories, and autonomous research institutions, aligned with the **Sustainable Development Goals (SDGs)**

Environment – Advancing Sustainability & Ecological Balance

NuSummit will undertake initiatives that promote **environmental sustainability and responsible resource management**.

This includes:

- Conservation of **natural resources**, biodiversity, and ecological balance
- **Soil, air, and water** conservation, afforestation, and climate-positive actions
- Support for **sanitation, clean water, and environmental restoration** initiatives

Enablement – Strengthening Community Well-being

NuSummit will focus on initiatives that **uplift communities and improve social resilience**, particularly for vulnerable groups.

This includes:

- **Healthcare, nutrition, sanitation, and preventive care**
- **Women empowerment, gender equality, and social inclusion**
- **Livelihood enhancement, rural and slum development**
- **Disaster relief, rehabilitation, and reconstruction**
- Promotion of **sports**, including rural, Paralympic, and Olympic

5.3 Implementation Strategy:

NuSummit will direct its CSR contributions through accredited foundations and partner agencies that align with its CSR vision. These partners will manage and execute programs on NuSummit's behalf, ensuring alignment with its goals. Only agencies meeting the required legal registrations and qualifications will be considered for collaboration.

- Registered with the Ministry of Corporate Affairs (MCA)
- Hold valid 12A and 80G certifications
- Listed on NITI Aayog's Darpan Portal

- Demonstrated experience in executing impactful CSR programs
- Maintain transparent financial records

All partnerships will be vetted for credibility and alignment with NuSummit's CSR goals. Employees will be encouraged to actively participate through volunteering and knowledge-sharing.

5.4 Governance and Oversight:

The Board of Directors shall oversee and guide the company's CSR efforts through the following key responsibilities:

- 1. Policy Approval & Oversight**
Approve and periodically review the CSR Policy, ensuring alignment with the activities listed under Schedule VII of the Companies Act, 2013.
- 2. CSR Budget Compliance**
Ensure that the company annually spends at least **2% of the average net profits** from the preceding three financial years on CSR, with **administrative costs capped at 5%** of total CSR expenditure.
- 3. Action Plan Formulation**
Approve the annual CSR action plan and make necessary adjustments during the year based on justified needs.
- 4. Fund Utilization Assurance**
Confirm that CSR funds are used strictly for approved purposes and in the intended manner.
- 5. Project Monitoring**
Track the progress of ongoing CSR projects against approved timelines and budgets, and authorize changes to ensure smooth execution.
- 6. Regulatory Disclosures**
Ensure timely and accurate CSR disclosures in the Board's Report as per statutory requirements.
- 7. Public Transparency**
Disclose the CSR Committee composition (if applicable), CSR Policy, and approved projects on the company's website.
- 8. Project Duration Adjustments**
Approve extensions for CSR projects that were not initially classified as multi-year but require continuation beyond one year, based on reasonable justification.

5.5 CSR Team Responsibilities:

The Board of Directors shall nominate members to form the CSR Team, which will be entrusted with planning, executing, and monitoring the company's CSR initiatives. With Board approval, the CSR Team will lead the following key functions:

1. **Strategic Action Planning**
Develop an annual CSR action plan outlining proposed projects, execution strategies, budget allocations, expected outcomes, and timelines.
2. **Program Oversight**
Facilitate bi-annual reviews of CSR programs by the Board, including site visits, beneficiary feedback, and field assessments to ensure effective implementation.
3. **Impact Reporting**
Submit an annual report detailing CSR outcomes, fund utilization, and key learnings, to be included in the company's annual disclosures.
4. **Management of Ongoing Projects**
Oversee multi-year CSR projects with durations not exceeding three years (excluding the year of commencement), including those extended beyond one year with Board approval.
5. **Focus on External Beneficiaries**
Ensure all CSR initiatives benefit external communities, in accordance with the Companies Act, and exclude company employees and their families.

5.6 Management of Unspent CSR Funds:

In accordance with Section 135 of the Companies Act, 2013 and applicable rules:

- **For ongoing CSR projects:** Any unspent CSR amount related to an ongoing project must be transferred by the Company to a designated bank account titled **"Unspent Corporate Social Responsibility Account"** within **30 days** from the end of the financial year. These funds must be utilized within the next **three financial years** exclusively for the approved CSR activities.
- **For other unspent CSR amounts** (not linked to ongoing projects):
The Company shall transfer such unspent funds to a **specified fund under Schedule VII** of the Companies Act, 2013 within **six months** from the end of the financial year.

This ensures that all CSR allocations are responsibly managed and directed towards meaningful social impact, in full compliance with statutory obligations.

6 Policy Enforcement

Any user found to have violated this policy may be subject to disciplinary action by any combination of the following but not limited to:

- Informal and/ or formal warning
- Denial of access to any system
- Escalate to his / her HOD.
- Initiation of suitable disciplinary action including termination from services.