



CORPORATE SOCIAL RESPONSIBILITY POLICY

Infinity Labs Limited



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This policy has been instituted based on the Corporate Social Responsibility (“CSR”) philosophy of Infinity Labs Limited and provisions of Section 135 of the Companies Act, 2013, read with Schedule VII of the Companies Act, 2013 (“the Act”) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (“Rules”). This policy will at all times be subject to the provisions of the aforesaid Act and Rules (as amended from time to time). This Policy will come into force with immediate effect.

WHAT IS CSR?

The term “Corporate Social Responsibility (CSR)” can be referred as corporate initiative to assess and take responsibility for the company’s effects on the environment and impact on social welfare. The term generally applies to companies efforts that go beyond what may be required by regulators or environmental protection groups.

Corporate Social Responsibility may also be referred to as “corporate citizenship” and can involve incurring short term costs that do not provide an immediate financial benefit to the company, but instead promote positive social and environmental change.

Moreover, while proposing the Corporate Social Responsibility Rules under Section 135 of the Companies Act, 2013, the Chairman of the CSR Committee mentioned the Guiding Principle as follows: “CSR is the process by which an organization thinks about and evolves its relationships with stakeholders for the common good and demonstrates its commitment in this regard by adoption of appropriate business process and strategies. Thus CSR is not charity or mere donations. CSR is a way of conducting business, by which corporate entities visibly contribute to the social good. Socially responsible companies do not limit themselves to using resources to engage in activities that increase only their profits. They use CSR to integrate economic, environmental and social objectives with the company’s operations and growth.”

1. CORPORATE SOCIAL RESPONSIBILITY PHILOSOPHY:

INFINITY LABS LIMITED (“the Company”) has always been committed to the cause of social service and has repeatedly channelized a part of its resources and activities, such that it positively affects the society socially, ethically and also environmentally. The Company is taking up various Corporate Social Responsibility (“CSR”) initiatives and enhanced value in the society.



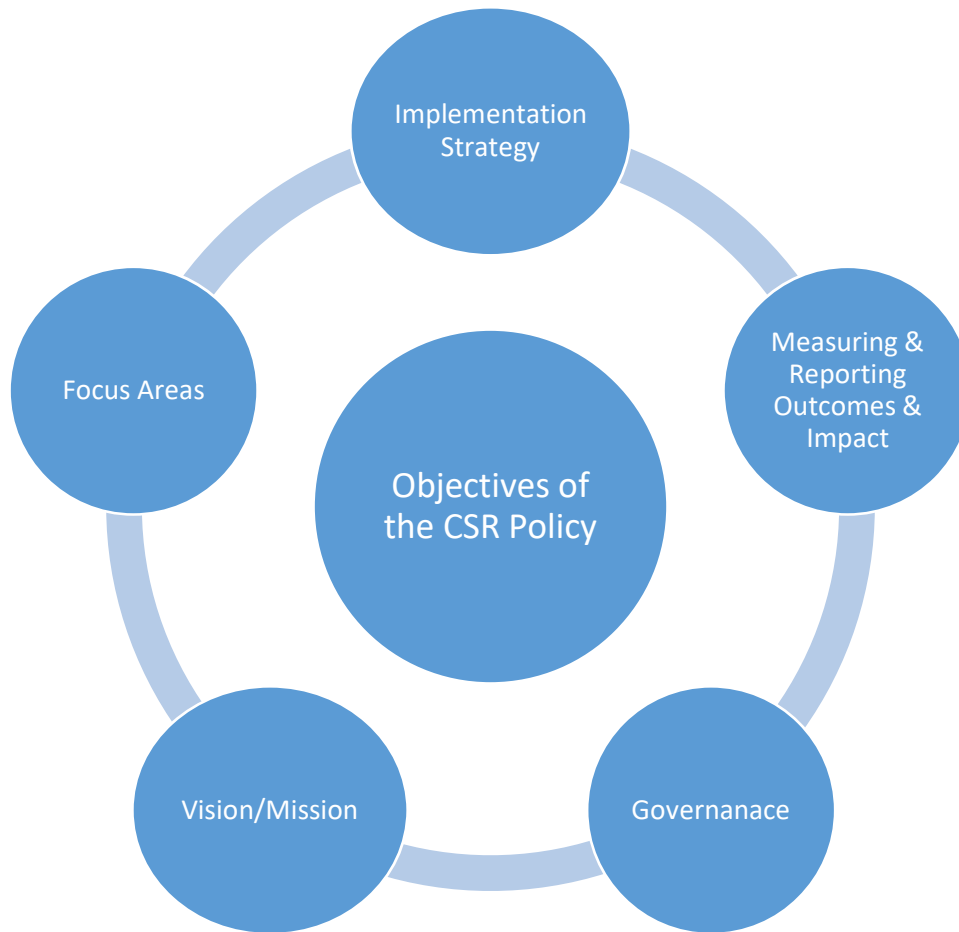
The social and environmental responsibility has always been at the forefront of Company's operating philosophy and as a result, the Company consistently contributes to socially responsible activities. CSR at the Company portrays the deep symbiotic relationship that the Company enjoys with the communities it is engaged with. As a responsible corporate citizen, the Company try to contribute for social and environmental causes on a regular basis. We believe that to succeed, an organization must maintain highest standards of corporate behavior towards its employees, consumers and societies in which it operates. The Company is of the opinion that CSR underlines the objective of bringing about a difference and adding value in our stakeholders' lives.

With the advent of the Companies Act, 2013 constitution of a Corporate Social Responsibility Committee of the Board and formulation of a Corporate Social Responsibility Policy became a mandatory requirement. Therefore, the Company has formulated a robust CSR Policy which encompasses its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs for the welfare and sustainable development of the society.

2. SCOPE AND EXCLUSION:

The following are the key elements of the policy:

- 2.1 Vision and framework of Corporate Social Responsibility and its approach towards the same.
- 2.2 Key focus areas of inclusive development
- 2.3 Overview of the implementation strategy of various CSR initiatives
- 2.4 Methodology of measuring and reporting outcomes and impact
- 2.5 Governance Structure



3. FOCUS AREAS AND MODES OF IMPLEMENTATION:

❖ Focus areas

In accordance with the requirements under the Companies Act, 2013 and the rules/regulations framed there under and circulars/clarification issued thereunder (collectively, “Applicable Law”), Infinity CSR activities, amongst others, will focus on:

- a. **Hunger, Poverty, Malnutrition and Health:** Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.
- b. **Education:** Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.



- c. **National Heritage, Art and Culture:** Protecting national heritage, art and culture, including the restoration of buildings, sites of historical importance, and works of art; setting up public libraries; reviving, promoting and developing traditional arts and handicrafts.

❖ **Modes of implementation**

Sr. No.	Focus Area	Implementation Strategy
1.	Hunger, Poverty, Malnutrition And Health	Work directly or with non-profit organizations at infrastructure and/or operational level - a. To reach out to underserved communities and work toward making a meaningful difference. b. Focus towards distributing hot, nutritious and fresh food to poor, needy & hungry children. Helping our pioneering & pain staking endeavour to ensure that no poor or under – privileged child goes hungry. c. Provide hygiene kits for underprivileged children.
2.	Education	a. Contributing to the vitality and wellbeing of the students who face a lack of basic necessities for reasons like living in underserved areas.
3.	National Heritage, Art and Culture	a. Supporting to a disabled artists, who due to disability to their hands, create art with their mouth or foot.

❖ **CSR Activities**

Other CSR activities that may be undertaken by the Company in addition to the above mentioned activities:

- a. promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.



- b. 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
- c. measures for the benefit of armed forces veterans, war widows and their dependents
- d. training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
- e. contribution to the prime minister's national relief fund or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- f. Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
- g. Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).]
- h. rural development projects.
- i. slum area development.
- j. disaster management, including relief, rehabilitation and reconstruction activities.

Effects of interpretations/clarifications and amendments on projects/ programs /activities

The objective of the CSR Policy is to act as a guideline for the company in its endeavor to undertake socially relevant activities that will result in the overall objective of the company to create societal capital/assets for the common good and the list of activities shall be interpreted in a manner that



will advance the objective. The policy shall be deemed to have amended or modified to the extent of any modification/amendments or clarifications issued by the Central Government from time to time in relation to the CSR obligations of companies and shall be interpreted accordingly.

4. CSR COMMITTEE:

CSR Committee means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act

Composition of Committee:

1. Mr. Rakesh Goyal, Chairman (DIN: 09677213)
2. Mr. Abhijit Ashok Aphale, Member (DIN: 01758838)
3. Ms. Ritu Goyal, Member (DIN: 08083111)

Role of the CSR Committee:

- Review and recommend amendments to CSR Policy of the company.
- Formulate and recommend to the Board, an Annual Action Plan and amendments to CSR Annual Action Plan of the company.
- Advise alterations to Annual Action Plan, if any, with reasonable justification.
- Review the progress and monitor CSR Projects/ Programs already undertaken by the company and the utilization of budgets/ expenditure for each such Projects/ Programs.
- Decide an implementation methodology.
- Review details of impact assessment, if any, for the Projects/ Programs undertaken by the company.
- Review and recommend the CSR Report to be included in the Boards' Report of the Company.
- Review and recommend any amendments to be made in the CSR policy of the Company.
- To carry such other functions as may be delegated to it by the Board relating to CSR activities of the Company.

5. UNDERTAKING CSR ACTIVITIES:



Company will undertake its CSR activities (being projects / programs / other permitted activities), approved by the CSR Committee either directly or through such other eligible entity / organization as approved by the CSR Committee.

The surplus arising out of the CSR activities shall not form part of the business profit of the Company. Such surplus shall be spent towards its CSR activities in accordance with this policy.

Identification and implementation of multi-year CSR projects / programs ("**Ongoing Projects**") will be monitored by the CSR Committee and the Board of Directors of the Company ("**the Board**"), as required under Applicable Law.

6. CSR ANNUAL ACTION PLAN:

In order to comply with the CSR objectives and to achieve the CSR related goals, the CSR committee shall formulate and recommend the Board, an Annual Action Plan, which would *inter alia* include the following:

- (a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- (b) the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
- (c) the modalities of utilization of funds and implementation schedules for the projects or programmes;
- (d) monitoring and reporting mechanism for the projects or programmes; and
- (e) details of need and impact assessment, if any, for the projects undertaken by the company;

7. CSR INITIATIVES:

In line with Schedule VII of the Act and the CSR Rules, the Company shall undertake CSR activities included in its Annual Action 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 Action Plan or to propose any new program during the financial year under review.

8. MONITORING OF CSR ACTIVITIES:

CSR committee of the company will be responsible for the monitoring of various CSR projects or programs undertaken by the company directly or indirectly. The committee shall have, inter-alia, the following roles, powers and responsibility:



- i. Formulate and recommend the CSR Policy and any amendments therein to the Board of Directors of the Company
- ii. Develop and approve various CSR projects, programs and activities to be undertaken from time to time either directly by the Company or through other entities
- iii. Determine modalities of execution of such CSR projects, programs and activities
- iv. Undertake all necessary steps to implement the CSR activities
- v. Authorize and approve CSR expenditure from time to time subject to the limits approved by the Board of Directors
- vi. Monitor the CSR activities in such manner as it deems fit
- vii. Carry out all such acts, deeds, matters and things as may be required in connection with aforesaid matters and generally for any matter connected with the CSR policy of the Company
- viii. To perform such functions as may be entrusted by the Board of Directors from time to time.

9. COMPOSITION OF CSR COMMITTEE AND DISCLOSURES:

The CSR Committee shall be comprised in accordance with the requirements of Applicable Law. This CSR Policy, details of the composition of the CSR Committee and projects approved by the Board shall be hosted on the Company's website at www.infinitylabs.in

10. TOTAL SPENT / OUTLAY:

In accordance with the provisions of the Companies Act, 2013 and Rules mentioned thereunder, the Company pledges to contribute at least 2% of the average net profits of the Company made during the immediately preceding three financial years specifically towards CSR projects. The surplus arising out of the CSR projects or programs or activities shall not form part of the business profits of the Company.

11. MONITORING AND REPORTING:

The Company shall continuously enhance its monitoring and assessment system and ensure that every program has:

- i. A defined objective/s;
- ii. Comprehensive progress monitoring system;
- iii. Impact Assessment;



- iv. Reporting framework and system in accordance with the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021

At the end of each financial year, the CSR committee shall prepare a report of the CSR program in the prescribed form relating to the financial year and submit to the board for its inclusion in the Board's report.

For enquiries related to the CSR initiatives, please contact us at:

Mr. Avadhut Aphale; contact no. +91-7028058059; email id: avadhut.aphale@infinitylabs.in

Approved By: Board of Directors

Approved on: 26th September, 2022

Modification on: NA

Effective date: 26th September, 2022

Without prejudice to the generality of the contents of this policy, the Company may undertake CSR projects, programs and activities as permitted under the framework of Companies Act, 2013 from time to time (including any amendments, clarifications, circulars, notifications or other official communications from time to time). The Company may also carry out the purposes of this CSR policy in accordance with any amended position of law from time to time notwithstanding that such amended position is not reflected in this policy. The Company reserves its right to modify, cancel, add, or amend any of the contents of CSR Policy.