Corporate Social Responsibility Policy

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1. Introduction

Corporate Social Responsibility at Xento is a reflection of its core values Be Excellent to Each Other and Be the Real Deal. As a responsible organization, we feel obligated to integrate social, economic & environmental concerns of our society within our work culture.

The primary focus area of Xento CSR is the provision of quality education services for children belonging to economically and socially backward strata of society, with emphasis on visually challenged children. Our belief is that good education forms the basis of a better tomorrow. Children with disabilities in rural India are deprived of many basic services due to lack of knowledge or unavailability of facilities within their vicinity. Social stigma around disability and poor economic conditions have been major obstructions in the growth of these children.

Having identified this lacuna, our CSR Committee decided to undertake 80% of our activities in this core area. We work towards the welfare and development (including employment) of these individuals, to help them integrate and live with equal opportunities in our society.

2. Objectives

The CSR Policy aims:
- To define guidelines for Xento CSR to make it a key business process for sustainable development of the society.
- To direct its CSR programs towards achieving one or more of the following - promoting education, including special education and employment enhancing vocational skills especially among visually challenged individuals, skill development, livelihood enhancement projects, providing preventive healthcare, environmental sustainability, rural development, and disaster and epidemic management.
- To implement CSR activities in close proximity to the Company's geographic location to ensure close supervision and achieve maximum impact.
- To identify and clearly define the modalities of implementation of its activities and a project lifecycle
- To provide a platform for its employees to contribute towards society on an individual level as a volunteer

3. Geographical profile

The CSR activities undertaken will be preferred in close proximity to the Company's operations in the state of Maharashtra, India. This will be to ensure timely monitoring of the progress of the beneficiaries and the impact of the project. However, projects in other rural regions of India, which align with our CSR policy, may also be undertaken, which lies at the sole discretion of the CSR committee.

4. Focus areas & Activities

In accordance with the requirements of the Companies Act 2013, **DB Xento Systems Pvt. Ltd.** CSR activities, amongst others, will focus on:

Sl No.	Focus Area	Activities
1.	Education	Promotion of education will be achieved in the following ways: (a) Scholarships for visually impaired (VI) students pursuing their secondary and higher education (b) Provision of grants to organizations/ schools working for educating the visually impaired (c) Promotion of digital literacy among VI students through the donation of infrastructure/ equipment, providing trained personnel, sponsoring courses etc. (d) Financial support to VI students for their accommodation and travel, if required, to help them stay in the desired city to pursue their education (e) Sponsorship of teacher training programs to ensure up-to-date knowledge of teachers
2.	Healthcare	(a) Donation of monthly ration to residential homes for the blind to ensure healthy meals are provided to VI students residing there (b) Donation of hygiene hampers to students in schools for the blind (c) Conducting health camps in schools for the blind, with support in further medical treatment, if required
3.	Skill development, Vocational training & Employment	(a) Providing grants/ supporting organizations working towards skill development and vocational training of visually challenged individuals (b) Helping individuals to set-up small scale businesses/ vocation and imparting the necessary skills to manage the livelihood initiatives
4.	Rural development	Support towards infrastructure development of organizations in rural areas, working towards education. We also act as a link between services and facilities available for VI individuals in rural areas, closest to them, and guide them through the process.
5.	Environmental sustainability	Tree plantation drives in collaboration with the Maharashtra state forest department
6.	Disaster management	(a) Activities of response and rehabilitation post natural disasters, epidemics and calamities including aid to direct beneficiaries affected, infrastructure support to hospitals, awareness initiatives etc. (b) Donation to permitted state disaster management authority

We can also undertake projects or programs relating to activities undertaken by the board, in pursuance of recommendations of the CSR committee, as per the declared CSR policy, subject to the condition that they are in conformity with the activities specified in Schedule VII of the Companies Act 2013.

5. CSR Committee & CSR Board

In accordance with Section 135 of the Companies Act 2013, DB Xento Systems Pvt. Ltd. has formed a CSR Committee that is responsible for the following:
- Formulate and recommend the CSR policy to the board
- Recommend CSR Activities and amount of expenditure to be incurred
- Implement and monitor the CSR activities as defined in the CSR Policy
- CSR Committee shall have full discretion to specify or modify the modalities of execution of CSR projects or programs and to determine implementation schedules.

The CSR Board will be responsible for the following:
- Form a CSR committee as per Section 135 of the Companies Act 2013
- Appoint a CSR executive, if the Company chooses to implement its CSR initiatives directly through its own dedicated personnel.
- Approve the CSR policy as recommended by the CSR Committee after ensuring that they conform to the applicable laws
- Ensure that CSR activities are undertaken and executed by the Company as per the CSR Policy and applicable laws
- Ensure that the statutory minimum expenditure is made on CSR activities and disclose reasons for not spending the said amount, if applicable

The CSR Committee of DB Xento Systems Pvt. Ltd. comprises of
1. Preetam Yadav, Managing Director
2. Sandeep Garud, Director

6. CSR Expenditure

CSR expenditure will include all funds, direct and indirect, incurred by the Company on CSR programs undertaken in accordance with the approved CSR plan. Any surplus arising from any CSR programs will be reused for CSR projects only. Any unspent amount will be transferred to the Unspent CSR Account and spent in pursuance of the CSR policy and its activities.

7. Modalities of implementation & Governance

Xento Systems may implement its CSR activities through the following methods:

1. Directly through Company personnel or
2. Through its own non-profit foundation which may be set- up so as to facilitate this initiative or
3. Through independently registered non-profit organizations that have a record of at least three years in similar related activities or
4. Collaborating or pooling our resources with other companies

The CSR committee may assign the task of implementation within the specified budgets and timeframes to the above-mentioned persons or bodies as they deem fit and timely monitor the progress of each project.

8. Selection of projects

DB Xento Systems Pvt. Ltd. will be open to receive requests for CSR support throughout the financial year. The CSR Committee will evaluate proposals, ensure due diligence procedures and prioritize appeals based on the focus areas and their impact. The recommendations will be forwarded to the CSR Board for final approval for the project to enter the Xento CSR program. The final approval will be at the sole discretion of the CSR Board.

9. Monitoring & Reporting

The CSR projects will be continually monitored by CSR executives and designated members by personal visits, meetings, and reports. Updates on projects will be given to the committee and board at the CSR committee meetings, on a periodic basis.

The implementation of the CSR programs will be reviewed from time to time and necessary directions may be issued, to ensure timely and efficient execution of the projects in accordance with the CSR policy.

The CSR Board will submit an annual report on CSR containing the following particulars:

1. A brief outline of the Company's CSR Policy, including an overview of projects or programs proposed to be undertaken and a reference to the web-link to the CSR policy and projects or programs
2. The composition of the CSR Committee
3. Average net profit of the company for last three financial years
4. Prescribed CSR expenditure
5. Details of CSR spent during the financial year
6. In case the company has failed to the statutory minimum CSR expenditure, reasons thereof
7. A responsibility statement of the CSR Committee that the implementation and monitoring of CSR policies are in compliance with CSR objectives and policies of the Company.

An annual presentation will also be made to the CSR Committee which will include details of the projects/activities planned for the next financial year along with its respective budgets and implementation modalities.

10. CSR at an Individual Level

Xento Systems also believes that CSR is an excellent opportunity for its employees to contribute their individual time and resources, to make a difference in someone's life. Our volunteering drive, called the **Xentian Social Responsibility**, is a platform for employees and their families to be a part of our CSR initiatives. We believe that employee participation is crucial to the success of our CSR initiatives and it helps in bringing the employees, the Company, and the community closer.

The involvement of Xentians at the implementation phase helps strengthen our existing relationships with partner organizations, by bringing in new ideas, skills, and thoughts to the table.
Our Senior management actively encourages employees to participate in CSR projects, leading by example. Rewards are also offered to employees where their efforts are recognized at various forums.

11. Contact

For any queries related to the CSR policy, write to us at csr@xento.com