Internal

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1.0	24/09/2014	Shilpa Deodhar	Initial version
1.1	20/3/2015	Shilpa Deodhar	Reviewed and updated
1.2	9/10/2018	Shilpa Deodhar	Reviewed. No change
1.3	13/7/2022	BPM-PG Team	Change in company name from RBEI to BGSW
1.4	17/7/2026	Shilpa Deodhar	Change in CSR vision and Mission. Update in Focus Areas. Reconstitution of Steering Committee and their roles and responsibility. Embed CSR guidelines as per circular published by Ministry of Corporate Affairs.

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1. Context

Section 135 of the Companies Act, 2013 (the 'Act') and Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended from time to time) requires every company having a net worth of Rs. 500 crore or more or turnover of Rs. 1000 crore or more or a net profit of Rs. 5 crore during the immediately preceding financial year to constitute a CSR Committee and comply with the provisions of CSR contained in the Act.

The CSR Policy of Bosch Global Software Technologies Pvt. Ltd. (referred to as the Company) has been framed in accordance with the provisions of section 135 of the Companies Act, 2013 ("Act") and the Rules prescribed thereunder (as defined hereinafter), (collectively referred as "Applicable Laws").

The Policy is applicable to Bosch Global Software Technologies Pvt. Ltd. w.e.f. the date of its approval by the Board of Directors.

2. Objective

The objective of this document is to articulate Bosch Global Software Technologies Private Limited's (the company's) CSR policy and outline the relevant framework for adhering to it. The company's CSR objectives are:

- To ensure increased commitment at all levels in the organization to operating their businesses in an economically, socially, and environmentally sustainable manner while recognizing the interests of all its stakeholders.
- To take up programs that benefit the community at large and further result in enhancing the quality of life and economic well-being of the beneficiaries
- To generate community goodwill and help reinforce the company's image as a positive and socially responsible corporate entity.

3. CSR Vision Statement

Vision: Here to serve with love and compassion, nurturing inclusive communities, caring for our environment, ensuring road safety and a sustainable future

Mission: Co-creating connected communities for equitable access, environmental stewardship and safe mobility

4. Guiding Principles

4.1 The company's CSR policy is guided by Bosch values and the basic principles of social responsibility. This includes human rights, equal opportunities, integration of handicapped people, free choice of jobs, relations with associate representatives and their institutions, fair working conditions, occupational health and safety, a clean and safe environment, and social engagement. The CSR policy of the company therefore focuses on certain main areas consisting of (i) education and skilling, (ii) environment, (iii) road safety (iv) community development and v) social-tech innovation.

4.2 The Company shall follow the following guiding principles for selection, implementation and monitoring of CSR activities as well as formulation of the Annual Action Plan:

1. In undertaking CSR Activities, the Company shall give preference to the local areas wherein the Company operates or has its offices.
2. The Company shall undertake only such CSR Activities, as are identified as Focus Areas under this Policy and the Applicable Laws and which are objectives as per international, national, or state level guidelines, priorities, and standards.
3. The Company shall not discriminate against the beneficiaries of the CSR Activities, on any grounds whatsoever, including race, gender, age, ethnicity, caste, religion, domicile, but may focus its CSR activities to benefit the economically or socially weaker, or marginalised sections, of the society.
4. The Company shall endeavour utmost transparency in selection, implementation, monitoring and reporting of CSR Activities.
5. The Company shall ensure that all CSR activities undertaken directly or indirectly, meet applicable standards of quality followed by the Company and/or are the market standard for such activities.

5. Applicability

5.1 This policy of the company, encompassing the company's philosophy for delineating its responsibility towards society as a good corporate citizen, lays down the guidelines and mechanisms for undertaking socially useful programs for the welfare and sustainable development of the community at large, is titled' BGSW CSR Policy'.

5.2 This policy shall apply to all CSR initiatives and activities taken up at the various locations of the company for the benefit of different segments of society, covering the projects undertaken in line with the said guiding principles.

5.3 CSR projects shall be implemented by the Company or through eligible implementing agencies as per Rule 4, duly registered on the MCA portal via Form CSR-1 and holding relevant 12A/80G or 10(23C) approvals, as applicable.

6. Governance Mechanism

6.1 Board of Directors:

Board will inter alia do the following:

- Approve the CSR Policy of the Company and make necessary disclosures.
- Ensure that the CSR activities are undertaken by the Company as per Annual Action Plan and as required under law, taking into account the approved timelines, year-wise allocation etc.
- Ensure spending of at least 2% of Net profits calculated as per section 198 of the Companies Act 2013.
- Ensure that the CSR activities are undertaken directly or through the entities specified in the applicable Rules.
- Approve the Annual Report on CSR with the prescribed disclosures and reports & place the same on the Company's website as required under law.
- Company complies with the provisions of law on CSR.

6.2 Board CSR Committee

The Committee comprises two Executive Directors from the Board, chaired by one of the Directors. The Committee will be assisted by a Secretary and the CSR Steering Committee (as defined below). The current Executive Directors are

S.no	Name of the Director	Designation	Date of Appointment
1.	Kaushik Sarkar	Director	October 01, 2019
2.	Salagame Ramaswamy Dattatri	Managing Director	July 07, 2020

6.3 Following are the responsibilities of the Board CSR Committee:

a) To approve CSR strategy, policy, budget, and goals for the Company
b) To review the implementation of CSR programs/ projects periodically
c) To ensure legal and regulatory compliance from a CSR standpoint

6.4 CSR Steering Committee

The Committee comprises members from various department of the Company Following are the responsibilities of the CSR Steering Committee:

1) To review and approve the scope of the programs and the key performance indicators of the outcome/ impact of the project
2) Review and approve the amount of expenditure to be incurred on the proposed projects

3) Review and approve suitable organizations to partner with the Company in implementing CSR programs
4) Periodic review of the progress of the approved projects
5) Approval of Annual report to present to the Board CSR Committee
6) Review and approve MoUs/Agreements with the NGO
7) Approving fund disbursal to NGO as per the Board Resolution
8) Audit of CSR fund utilization
9) To review the Impact Assessment report(s)

6.5 The proposed CSR Steering committee consists of

S.no	Name of the Member	Department	Role
1.	Jacob Peter Kidangath	MS/BE1 BD/EE MS/ESH	Chairman & Approver
2.	Umashankar B R	BGSW/ESP BGSW/ADM BGSW/ESP-EA	Member, Reviewer & Approver
3.	Shilpa Deodhar	CSR	Member & Reviewer
4.	Elangovan CE	CTG	Finance & Approver
5.	Manish Chawla	RMO/ICS	Audit
6.	Amjad Khan Patan	ECH-HYD MS/PJ-FIT-MS-PMO	Reviewer & Approver
7.	Gopinath Majumdar	MS/EPE-XE BGSW/ECH-PUN	Reviewer & Approver
8.	Padmini Navalgund	BGSW-QMM-PCO	Reviewer & Approver
9.	Ramesh Ramanujam	MS/NE2-VM BGSW/ECH-COB MS/EBP-VM	Reviewer & Approver
10.	Rajashree Rastogi	C/LSR2-IN	Legal

6.6 Resource and Budget Allocation

The CSR Steering Committee will table the annual plan along with budget details to the Board CSR Committee for its approval. CSR activities will be carried out as per the objectives and guiding principles, within the approved budget, from time to time. All CSR initiatives / activities will be approved/ ratified by the CSR Steering Committee.

7. Focus Areas

The CSR activities of the company would be conducted directly or through Implementation Partner(s) within India, with a specific focus across the locations where the company has its presence. The following are the focus areas, (i) education and skilling, (ii) environment,

(iii) road safety (iv) community development and v) social-tech innovation in alignment to Schedule VII of the Company's Act as below:

- Eradicating hunger, poverty and malnutrition, [promoting health care including preventinve health care] and sanitation [including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water.
- 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 [including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga]
- promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups
- promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects
- Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
- 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 Organization (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)]
- Contribution to the prime minister's national relief fund [or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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;
- Disaster management, including relief, rehabilitation and reconstruction activities.

8. CSR Expenditure

- Every year the Company shall spend at least 2% of its average Net profit as defined under the Rules ("CSR obligation") during the three immediately preceding financial years, on CSR Activities as per approved Annual Action Plan.
- Any amount remaining unspent at the end of the financial year, if any, except in case of an ongoing project, shall be transferred to a Fund to be specified in Schedule VII for this purpose, within six months of the expiry of the relevant financial year.
- In case the Company undertakes any Ongoing Project, any amount remaining unspent

and earmarked for the Ongoing Project, shall be transferred within thirty days from the end of the financial year to a special account to be opened for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent within three financial years from the date of such transfer, failing which, the unspent amount shall be transferred to the Fund to specified in Schedule VII for this purpose, within thirty days from the date of completion of the third financial year.

- The CSR activities undertaken/to be undertaken by the Company are not expected to lead to any additional surplus. However, if any additional surplus is generated, it would be dealt with in compliance with the provisions of the Act.
- Administrative overheads shall not exceed 5% of total CSR expenditure for the financial year.

9. CSR Annual Action Plan

The CSR Activities to be undertaken by the Company under the Policy shall be approved by way of the Annual Action Plan by the Board on the recommendation of the CSR Committee.

The Annual Action Plan shall, inter alia, contain the following information with respect to the CSR Activity proposed to be undertaken by the Company:

1) list of projects or programmes to be undertaken, in the relevant financial year;
2) manner of execution;
3) modalities of utilization of funds,
4) implementation schedule
5) monitoring and reporting mechanism and
6) details of need and impact assessment, if any.

The Board on the recommendation of the CSR Committee shall be the absolute authority to update, alter, modify, amend, withdraw and replace the Annual Action Plan for justified reasons.

10. Implementation of CSR Activities

The Company will undertake CSR activities within the 'Focus Areas' mentioned above and such other activities closely linked to the same. Such activities would be in partnership with Institutions, Trusts, Government bodies, NGOs & Local communities, where necessary.

Project activities identified under CSR are to be implemented by the dedicated CSR Team of the Company through or via Societies, Trust, Not-for-profit Companies under section 8 of Companies Act, 2013, **by State Government, District Administration, Local Administration as well as Central Government Department/ Agencies, Self-help Groups and Farmer Producer Organization etc.** and such other bodies / associations registered under any Laws of India, in force from time to time. For specialized input under any project, the CSR team may involve other agencies. The time / duration over which a particular program will be spread, will depend on its nature, extent of coverage and intended impact of the program.

Programs involving considerable financial commitment and undertaken on a timeframe of 2 to 5 years will be considered as 'flagship programs' and accorded enhanced significance.

The approved CSR activities and projects shall be carried out in any of the following ways as the CSR Committee in its absolute discretion may decide. The CSR Committee may decide to use any one or all or a combination of any of the following ways to undertake the said CSR activities and projects:

- by the Company directly;
- through Foundation or Trust that has been established by the Company; and/or
- through any other registered trust / any registered society / any other company that is qualified to undertake CSR activities in terms of the provisions of the Companies Act, 2013 and rules prescribed thereunder.

In the event the CSR activities are undertaken by the entities listed in (b) and/or (c) above, the Committee shall specify the activities, projects or programs that are to be undertaken, the modalities for utilization of funds on such projects and programs and the monitoring and reporting mechanisms to be followed in that regard.

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

The company reserves the option to strategize and implement an exit plan for diverse reasons, such as empowering communities to assume ownership of the solution and fostering their self-sufficiency and transformative progression, thereby perpetuating its impact.

11. Due Diligence

The Company will facilitate a documented due-diligence process prior to entering any partnership with implementation partner as may be necessary. The CSR team of the Company will conduct quarterly review of its implementation partner to ensure that the delivery of the project is in line with Company's objectives and agreed project timelines / outcomes.

12. Timeline and Disbursement

The project completion timeline and expected outcomes will be agreed upon at the time of entering the Memorandum of Understanding (MoU) with the identified partner. Monitoring adherence thereto would be ensured by the CSR team of BGSW.

The disbursement plan will either be phase-wise or one-time, depending on the nature and the requirements of the project. The terms, conditions and disbursement pattern will be discussed with the project implementation partner to agree on the disbursement schedule and will typically be part of the MoU between the two entities (Company & the implementing agency). The disbursements for CSR activities will adhere to the normal commercial procedures as laid down by the Company.

13. Monitoring and Reporting

- To ensure effective implementation of the CSR programs undertaken at each location, a monitoring mechanism will be put in place by the CSR team. The progress of CSR programs under implementation at locations will be reported on a regular basis. The monitoring process may involve the below aspects:

  1) **Review by Board CSR committee**: On a periodical basis, the Board CSR Committee will review the implementation of CSR. The CSR Committee shall review the progress on the Annual Action Plan preferably on quarterly basis but not less than twice a year. The Board shall review the status of implementation and fund utilization of the various projects and programmes as per approved Annual Action Plan at least once a year.
  2) **Review by CSR Steering Committee**: The Steering Committee shall provide critical oversight for the Company's CSR initiatives, operating under the Board CSR Committee's direction. Its responsibilities, to be discharged at a minimum frequency of once every quarter, encompass reviewing and approving program scope, and project expenditures, reviewing Impact Assessment reports; vetting and approving partner organizations; conducting periodic reviews of project progress; approving the annual CSR report for the Board CSR Committee; reviewing and approving MoUs/Agreements with Implementation Partners; authorizing fund disbursals as per Board Resolutions; and auditing CSR fund utilization to ensure legal compliance and effective resource deployment.
  3) **Audited Utilization Certificate**: Funds released to the implementing agency would be generally based on a satisfactory utilization certificate duly certified by a third party audit agency and an authorized officer/CEO/CFO of the donee entity and satisfactory performance report submitted by the said person, as may be decided by the CSR Committee.
  4) **External Agency assessment**: The CSR Activities will be effectively and objectively monitored using appropriate monitoring tools that may include one or more of the third-party audit or certifications, impact assessment, self-assessment report, field visit, periodical review or any other appropriate mechanism.
  5) **Audit**: The amount spent on CSR by the Company will be subject to audit as may be determined by the CSR Steering Committee and as per applicable laws.
  6) **Reporting in the Annual Report of the Company**: CSR Policy and initiatives of the Company will be reported in the Annual Report of the Company in the

manner prescribed under the CSR Rules. All the reports would be documented and hosted on the Company website also.

- CSR team will conduct impact studies / social audits on periodic basis, through independent professional third parties / professional institutions, where necessary, especially on the flagship programs. The executive summary of the study will be reported to CSR Steering Committee.
- The Directors' Report within the Annual Report of the Company will include:

  1) Brief outline of the Company's CSR policy including an overview of activities proposed to be undertaken
  2) Reference to the web-link to the CSR Policy
  3) Composition of Board CSR Committee
  4) Average net profit for last 3 financial years
  5) Prescribed CSR spends
  6) Details of CSR activities /projects undertaken during the year
  7) Total amount to be spent for the year
  8) Amount unspent if any
  9) A responsibility statement, of the CSR Committee, that the CSR policy implementation and monitoring therefore is, in letter and spirit, in compliance with CSR objectives.

14. General

- In case of any doubt about any provision of the policy and in respect of matters not covered herein, a reference to be made to Company's BGSW/CSR.
- In all such matters, the interpretation & decision of the CSR Committee shall be final and binding. Any or all the provisions of the CSR Policy may be revised / amended as necessary. The Company reserves the right to modify, cancel, add or amend any part of this policy framework.

15. Distribution

The policy will be shared with all the employees of the Company and also to the public through the Company's website.