

Corporate Social Responsibility (CSR) Policy

“Switch to Impact – India”

Introduction

STUP Consultants Private Limited (“**STUP**” or “**the Company**”) recognizes its responsibility to contribute meaningfully to the social, economic, and environmental well-being of the communities in which it operates. As a responsible Company, it is committed to conducting its business in an ethical, sustainable, and socially responsible manner. The Company is a wholly-owned subsidiary of Assystem S.A. (“**Assystem**”), a France based entity.

1. Background and Alignment with Assystem Group Policy

Assystem Group’s global policy “**Switch to Impact**” is built around three strategic pillars:

- **Switch & Act for Climate** (energy transition, carbon reduction),
- **Switch & Act for Knowledge** (skills, education, scientific and technical capabilities), and
- **Switch & Act for People** (ethics, inclusion, health, safety, and responsible growth).

The Company adopts and localises these principles in line with **Indian statutory requirements**, while responding to India’s social, environmental, and developmental priorities.

2. Statutory Framework

This policy is framed in accordance with:

- Section 135 of the Companies Act, 2013 (“**The Act**”)
- Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended)
- Schedule VII of the Companies Act, 2013

Wherever amendments are made to the CSR provisions under Indian law, this policy shall be deemed to be modified accordingly.

3. Permissible Activities in Accordance with The Act

Following Activities (“**Activities**”) are allowed under Schedule VII of The Act for CSR expenditure:

- (i) eradicating hunger, poverty and malnutrition, promoting health care including preventive 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



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- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) 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;
- (iv) 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 setup by the Central Government for rejuvenation of river Ganga;
- (v) protection of National Heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- (vi) measure for the benefit of armed force veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- (vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sports;
- (viii) contribution to the Prime Minister’s National Relief Fund or Prime Minister's Central Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women;
- (ix) (a) 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
(b) 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 Defence 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).
- (x) rural development projects.



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(xi) slum area development

(xii) disaster management, including relief, rehabilitation and reconstruction activities.

4. CSR Focus Areas (Schedule VII Aligned)

The thrust area of the Company is to undertake following projects or programs out of the **Activities** mentioned above, with thematic alignment to Assystem group priorities:

4.1 Education, Knowledge and Skills (Switch & Act for Knowledge)

- Promoting education, including special education
- Enhancing vocational skills, technical training, and employability
- Supporting STEM education, digital literacy, and engineering skills
- Training and livelihood enhancement projects

4.2 Environmental Sustainability and Climate Action (Switch & Act for Climate)

- Environmental sustainability and ecological balance
- Conservation of natural resources and biodiversity
- Climate change mitigation and adaptation initiatives
- Renewable energy, energy efficiency, and carbon reduction programmes

4.3 Health, Safety and Well-Being (Switch & Act for People)

- Preventive healthcare and sanitation
- Mental health, occupational health, and community well-being
- Access to clean drinking water and hygiene initiatives

4.4 Social Inclusion and Equity

- Promotion of gender equality and empowerment of women
- Support for persons with disabilities
- Projects for socially and economically disadvantaged groups
- Rural development and community infrastructure



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4.5 Disaster Relief and National Priorities

- Disaster management, relief, and rehabilitation
 - Contributions to funds notified under Schedule VII
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5. Governance Structure

5.1 CSR Committee

The Board of Directors shall constitute a **CSR Committee** in compliance with Section 135 of the Companies Act, 2013.

The CSR Committee shall:

- Formulate and recommend the CSR Policy
- Recommend CSR projects, programmes, and annual budgets
- Monitor implementation and impact of CSR initiatives
- Ensure compliance with applicable laws and reporting requirements

5.2 Board of Directors

The Board shall:

- Approve the CSR Policy
 - Ensure that CSR activities are implemented as approved
 - Disclose CSR performance in the Board's Report
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6. CSR Budget and Spending

The Company shall spend, at least **2% of the average net profits** of the Company made during the three immediately preceding financial years, in accordance with Section 135 of the Companies Act, 2013.

- Any surplus arising out of CSR activities shall not form part of business profits and shall be utilised in accordance with CSR Rules.
- Unspent CSR amounts shall be treated in compliance with statutory requirements, including transfer to specified funds or a dedicated Unspent CSR Account, as applicable.



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- The CSR projects or programs or activities undertaken in India only shall amount to CSR expenditure.

7. CSR Implementation

CSR programmes may be implemented through:

- The Company directly
- Registered implementing agencies in compliance with CSR Rules
- Collaboration with government bodies, village panchayats, NGOs, or academic institutions

All implementing partners shall be subject to due diligence, transparency, and monitoring requirements.

8. Implementing Agencies

The Board of the Company may decide to undertake its CSR activities as recommended by the CSR Committee, directly or through a registered trust or a registered society or a company established by the company or its holding or subsidiary or associate company pursuant to Section 135 of the Companies Act, 2013 and rules made there-under.

Parameters for Selection of Implementing Agency

1. The agency should be registered with MCA having Unique CSR Registration Number

9. Monitoring, Evaluation and Impact Assessment

- CSR projects shall be monitored periodically by the CSR Committee
- Appropriate **Key Performance Indicators (KPIs)** shall be defined
- Impact assessments shall be undertaken for applicable projects in line with CSR Rules
- Learnings shall be used to improve programme effectiveness and long-term impact

10. Ethics, Transparency and Governance

The Company is committed to:





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- Zero tolerance towards corruption, fraud, or misuse of CSR funds
 - Ethical conduct and compliance with all applicable laws
 - Transparent reporting and disclosures
 - Respect for human rights, diversity, and inclusion in all CSR engagements
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11. Reporting and Disclosure

- CSR activities and expenditure shall be disclosed in the Board’s Report
 - Details of the CSR Policy shall be placed on the Company’s website
 - Statutory filings shall be made as required under the Companies Act, 2013
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12. Review and Amendment

This CSR Policy shall be reviewed periodically by the CSR Committee and the Board. Any amendment shall be made in line with changes in law, business strategy, or Assystem Group sustainability priorities.





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STUP CONSULTANTS PRIVATE LIMITED

Composition of Corporate Social Responsibility (CSR) Committee

Name of Committee members	Position on Committee	Nature of Directorship
Mr. Ashish Tandon	Chairperson	Managing Director
Mr. Stephane Aubarbier	Member	Director

Note: A Member from CSR Team shall be permanent invitee to the committee.

VERSION HISTORY

Version	Approved By	Date
1	Board of Director	

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