

MERATIVE TECHNOLOGIES INDIA PRIVATE LIMITED

Corporate Social Responsibility (CSR) Policy

Introduction

Merative Technologies India Private Limited (“Merative India”) is a leader in leveraging data, analytics, and technology to advance health and social care.

Recognizing our responsibility to the communities we serve, Merative India is committed to contributing to societal development through its Corporate Social Responsibility (CSR) initiatives. This CSR Policy outlines Merative India’s strategic approach, ensuring all activities are aligned with Section 135 of the Companies Act, 2013, and related regulations.

Objective

This CSR Policy outlines Merative India’s strategic approach to corporate social responsibility within India. It details our focus areas, programs, governance frameworks, monitoring, and reporting that guide our CSR initiatives. The policy serves as a roadmap to drive meaningful contributions to the socio-economic development of our communities.

Vision for Merative India CSR

Merative India’s CSR programs align with the causes listed in Schedule VII of the Companies Act 2013 and are delivered directly and in partnership with trusted NGOs, employee engagement, and the communities in which Merative India operates. Additionally, Merative India will consider support to any disaster relief efforts as required.

Governance and Reporting:

Merative India employees who form the CSR Team, and will perform the following actions:

- I. Identify programs and projects to be undertaken under the CSR policy as per Schedule VII of the Companies Act 2013.
- II. Recommend to the board the overall CSR budget and annual action plan in alignment with the Companies Act, 2013, and CSR expenditure to be incurred for the identified activities and programs.
- III. Recommend modifications and amendments to the CSR policy as the board requires.
- IV. Regularly monitor the implementation of the CSR policy. Approval authority for project and budget approval rests with the board.
- V. Periodically review CSR spending and utilization reports issued by the implementing agencies.

Identification of Projects

The CSR Team shall identify suitable activities and programs to be undertaken by the Company in the areas enumerated under Schedule VII of the Act as amended from time to time and in line with the CSR objectives of Merative India.

When undertaking CSR activities and programs, preference shall be given to areas with an employee presence. It may also undertake CSR activities and programs at other places in India.

Annual Action Plan:

The CSR projects and programs are to be implemented according to the annual action plan approved by the board. The annual action plan shall be prepared based on the programs identified and shall include the following details:

- I. Details of CSR activities or programs identified, including the details of beneficiaries (in the case identified) of the proposed CSR programs.
- II. Evaluating the activity to ensure it is in line with Schedule VII of the Act.
- III. Location of the project.
- IV. Amount allocated for the project.
- V. Mode of implementation.
- VI. Details of Implementing Agency, which shall include the below details:
 - i. Registration Certificate under section 12A
 - ii. Registration Certificate under 80G of the Income Tax Act, 1961
 - iii. CSR Registration Number allotted by the Ministry of Corporate Affairs
- VII. Project duration shall include the timeline for the implementing agency's utilization of CSR funds.
- VIII. Monitoring and reporting mechanism for each CSR Project.
- IX. Details of the need for impact assessment, if any, is required for the company's CSR projects as required under the Act.

Guidelines for Annual Action Plan

An annual action plan shall be prepared for each fiscal year by and recommended to the board of directors, including (i) the list of CSR Projects to be undertaken in areas specified in Schedule VII of the Act, (ii) the manner of execution of such projects, (iii) the manner of utilization of funds and implementation schedules for the projects, (iv) the monitoring and reporting mechanism for the projects, and (v) any activities related to, or requiring an impact assessment.

The board of directors may amend the annual action plan at any time during the year, as needed.

CSR Spend

The board of directors shall ensure that at least two percent (2%) of the average net profit during the three immediately preceding three financial years is spent on CSR activities. The computation of average net profits shall be in accordance with the Companies Act 2013. The annual CSR Budget or any amendments that may be needed, shall be approved by the board of directors of Merative India before undertaking any CSR spending.

MODE OF IMPLEMENTATION

The CSR activities and programs shall be undertaken directly or through Section 8 Company/ Registered Public Trust/ Registered Society registered under Sec 12A and 80G of the Income Tax Act and having CSR Registration Number allotted by the Ministry of Corporate Affairs. The Company may also collaborate with other companies to undertake CSR activities or programs.

MONITORING MECHANISMS:

To effectively implement Merative India's CSR activities, its programs, and spending, a monitoring mechanism comprising of the following shall be stipulated:

- I. **Prior approval for each spending:** The board of directors shall approve CSR activities and related programs before undertaking any CSR spending.
- II. **Execution of CSR Programs:** The CSR Team will coordinate with implementing agencies to ensure the timely and effective execution of CSR projects in accordance with the approved annual action plan. This includes verifying fund utilization through periodic reviews, field visits, and beneficiary interactions.

The CSR Team shall submit periodic reports to the board on the details of CSR spending, utilization, and status of CSR activities/programs.

AMENDMENTS TO CSR POLICY: Merative India's board of directors shall have the power to revise/modify/amend this Policy as needed.