

CORPORATE SOCIAL RESPONSIBILITY POLICY

MATRIX COMSEC PRIVATE LIMITED - CORPORATE SOCIAL RESPONSIBILITY

Corporate Social Responsibility (CSR) - Philosophy:

Matrix Comsec Private Limited (Matrix) recognizes that as a responsible corporate entity it is a part of the society and has duties towards it. In addition to ensuring that operations are conducted efficiently and in a manner that meets governmental environmental standards, the Company is committed in ensuring that the communities where it operates also benefits and develops together. Matrix, have an intention to bring about maximization of social welfare and common good. Matrix actively participates in the development of the communities where its operation is located. 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 CSR Policy which encompassed its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs for the welfare & sustainable development of the society.

CSR Activities

The Company will select one or more of the following CSR activities for implementation in the area of its operation, namely:

The activities involve the following:

- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- 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;
- 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;

- 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;
- Measures for the benefit of armed forces veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- Contribution to the Prime Ministers' National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- Contributions or funds provided to technology incubators located within academic institution which are approved by the Central Government;
- Rural development projects.

Note:

1. Contribution of any amount directly or indirectly to any political party under section 182 of the Act, shall not be considered as CSR Activity/Expenditure.
2. CSR Activities undertaken in pursuance of the normal course of business of the Company and CSR Activities which benefit only the employee of the company and their family shall not be considered as CSR Activity.
3. Contribution outside India shall not be considered as CSR Activity.

The Geographical Reach:

The Companies Act, 2013 provides that the Company shall give the preference to the local area or areas around where it operates, for spending the amount earmarked for Corporate Social Responsibility. However the Committee may identify such areas other than stated above, as it may deem fit and recommend it to the Board for undertaking CSR activities.

Implementation:

The Company shall implement CSR activities by itself within the scope and ambit of the CSR activities defined in this policy by contributing the amount as recommended by CSR committee, to registered trust, society, and section 8 company or otherwise.

Fund Allocation:

1. The Company, in every Financial Year, shall endeavor to spend such feasible amount as CSR Expenditure, which shall be at least 2% of Company's average Net profits for the three immediately preceding Financial Years.
2. Total CSR expenditure shall be approved by the Board upon recommendation by the CSR Committee
3. In case the Company fails to spend the statutory minimum limit of 2% of Company's average net profits of the immediately preceding three years, in any given financial year, the Board shall specify the reasons for the same in its report in terms of clause (o) of subsection (3) of section 134of the Act.

Monitoring and Reporting Mechanism:

1. CSR Committee shall monitor the CSR Policy and CSR Activities. For this purpose, the CSR Committee shall meet at such intervals as it may deem fit.
2. Initiatives undertaken on the CSR front will be reported in the Annual Report of the Company.
3. CSR Committee shall ensure that the CSR Policy is displayed on the Company's website

Amendment:

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this Policy as and when required as deemed fit. Any or all provisions of the CSR Policy would be subject to revision /amendment in accordance with the Regulations on the subject as may be issued from relevant statutory authorities, from time to time.

Interpretation:

Any word used in this policy shall have the same meaning ascribed to it in the Companies Act, 2013 or Rule made thereunder, Listing Agreement, Accounting Standards or any other relevant legislation/law applicable to the Company.