Corporate Social Responsibility Policy

Deloitte Special Projects India Private Limited

Version	1/2025
Authorised by	Board of Directors

This CSR policy ("Policy") sets out the objectives and procedures to fulfill the Corporate Social Responsibility requirements to be followed by Deloitte Special Projects India Private Limited, pursuant to the Companies Act 2013 and rules made thereunder.

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Contents

1. Introduction

Deloitte Special Projects India Private Limited ("Company/Deloitte") aims to undertake Corporate Social Responsibilities initiatives pursuant to the applicable provisions of the Companies Act, 2013 and to work towards community development.

Being a leading global professional services provider, Deloitte believes that this position brings both opportunity and responsibility. Deloitte believes in applying its skills and resources where it can make the greatest impact on the society. This belief is entwined in all the Community involvement programs and that the same will be accomplished through a skill-based approach, driving meaningful change in the community by establishing a 360° connect by Corporate Social Responsibility ("CSR") program initiatives.

The Company's CSR activities revolve around five guiding principles – Impact, Partnerships, Affirmative Action, Communication and Innovation.

The initiatives to be taken by the Company are in consonance with projects and programs relating to activities specified under Schedule VII to the Companies Act, 2013 ("Act") and Section 135 of the Companies Act, 2013.

2. Objectives of the Policy

The main objective of CSR policy is to make CSR a key business process for sustainable development of the society by:

- Driving measurable change in our communities and
- Inspiring our actions as societal change makers and contribute to societal needs by applying our skills and expertise.

3. The Governance Model

Constitution of the CSR Committee

Pursuant to Section 135 of the Companies Act 2013, and the amendments thereof the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee, if the total CSR liability in a financial year, exceeds INR 50,00,000/- (Indian Rupees Fifty Lakhs Only) or as may be prescribed under the Act. The members of the CSR Committee shall be appointed by the Board of Directors of the Company. The CSR Committee shall constitute of at least two or more members from the Board.

The CSR committee shall hold at least one CSR Committee meeting in a financial year. The CSR agenda for the financial year shall indicate the activities to be undertaken for the financial year, and the expenditure to be incurred on the CSR programs and initiatives. The CSR Committee of the Board will govern and review CSR activities of the Company from time to time. The CSR Committee will recommend the Annual Action Plan for CSR to the Board for its approval.

In case of non-constitution of the CSR Committee, the Board shall assume the functions of the CSR Committee.

Board of Directors

The Board of Directors shall take into account the recommendations made by the CSR Committee, as applicable and approve the Annual Action Plan and CSR programs for the Company.

Role of the CSR Committee

a) To formulate and recommend to the Board of Directors, the CSR Policy and Annual Action Plan which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Act and the applicable Rules;

b) To recommend CSR activities to be undertaken by the Company or in collaboration with any other entity;

c) To recommend the amount of expenditure/budget to be incurred on the CSR activities;

d) To monitor the implementation of the approved CSR activities from time to time.

Reporting Structure and governance model

The Corporate Purpose office ("Purpose Office") team will be the key stakeholder in the governance of the CSR Policy and initiation of programs and initiatives within Deloitte. The Purpose Office team will keep the key internal and external stakeholders informed by regular communications and updates, including providing updates on the progress of the projects and addressing issues/concerns, if any.

4. Programs under the Policy

The Company shall undertake CSR activities included in its Annual Action Plan for that year, as recommended by the CSR Committee at the beginning of each year, as applicable and approved by the Board, in accordance with Schedule VII of the Act, and the rules thereof. The Board is authorized to approve any modification to the existing Annual Action Plan during the financial year under review.

The Annual Action Plan for the year will be primarily reviewed annually by the Purpose Office team, and then presented to the CSR committee, as applicable, which in turn shall present the annual agenda to the board of directors, for adoption and approval for each financial year.

The Company's CSR activities revolve around five guiding principles – Impact, Partnerships, Affirmative Action, Communication and Innovation.

Focused geographic spread

The Company will support initiatives in geographies as approved by the CSR Committee or the Board, as the case may be, from time to time with priority being given to the geographies in which the Company operates.

CSR Focus Areas

The Company's Purpose Office team will focus on the following thrust areas:

1. Healthcare and hygiene
2. Education
3. Employability
4. Empowerment
5. Ecology and Environmental sustainability
6. Disaster Management
7. Contribution toward government funds
8. Animal welfare

Besides the above thrust areas, the Company may also undertake CSR projects or programs pursuant to Schedule VII of the Companies Act, 2013 as detailed in Annexure A to this policy.

The Purpose Office team will work closely with and support the Board and the CSR Committee in identifying the areas of CSR activities, programs and implementing the CSR activities of the Company.

5. Guiding principles for Implementation and monitoring of the CSR activities

The general guidelines for selection, implementation and monitoring of CSR Activities as well as formulation of the Annual Action Plan:

a) All CSR proposals have to be within the framework of the CSR Policy of the Company.

b) Every proposal has to be in a project mode. This involves defining activities, time frame, financial requirement, organizational responsibilities, outcome/expected results and sustainable aspects. CSR Committee will evaluate the proposals and give its recommendations.

c) The proposals as above along with the identified budgets will be put before the CSR Committee at the beginning of each financial year for approval, along with the aforesaid recommendation.

d) The releasing of funds in a phased manner and submission of periodical status report on utilization thereof shall be clearly defined in the proposal to ensure proper utilization before release of further instalments.

The Board shall assume the role of CSR Committee as mentioned herein in the event CSR Committee is not constituted by the Company.

Responsibilities of the Implementation Agency

The Company will partner with and enter into an agreement with United Way of India, a non-profit organization, and its chapters in Hyderabad or other cities as required,("United Way") to conduct due diligence, evaluation and recommendation of projects of Non-Government Organizations ("NGOs") and grant management of the project. A detailed due - diligence will be completed by United Way in terms of regulatory and statutory compliances, governing body/board, and financial capability. The Company engages with NGOs only post clearance of due diligence and recommendation of United Way. Apart from this, Deloitte also does its own internal due diligence and conflict checks before engaging with an NGO.

United Way chapter has agreement with other NGOs to implement and execute the projects taken up by United Way for Deloitte.

Progress, Monitoring and Reporting

a) Deloitte will review the project proposal and monitor the implementation of the projects on regular basis by means of visits and meetings with NGO to ensure that the project objectives are achieved.

b) Deloitte will work with United Way in ensuring grant management is supervised and documentation and reports are collected in implementing the projects.

c) The CSR committee will be made aware of major updates/modifications, etc.

d) The Purpose Office team shall support the CSR committee and the Board by providing regular updates on the expenses incurred on CSR activities for the period.

6. Budgets and Expenditures

Deloitte shall allocate a budget for various identified CSR projects/programs falling within the purview of the objectives of this policy and Annual Action Plan. The CSR expenditure shall include all actual expenditures including contribution to corpus or on project or programs relating to CSR recommended by the CSR Committee and approved by the Board of Directors within the purview of Schedule VII of the Act.

7. Reporting and Disclosures

The expenditure for the financial year will be tracked by the Purpose Office team and reported to the Board members in the CSR committee meetings and Board meetings. Deloitte shall disclose its CSR Policy, programs/projects undertaken, and the expenditure made towards CSR activity in the Board's report forming part of annual report. Details of CSR Committee, CSR Policy and Annual Action Plan approved by the Board shall be displayed on the company's website.

8. Treatment of Surplus

Any surplus arising out of the CSR activities shall be a) ploughed back into the same project or b) transferred to the unspent CSR Account and spent in pursuance of CSR policy and Annual Action Plan of the company or c) transfer of such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

9. Annual Action Plan

In pursuance of this policy, CSR Committee will formulate and recommend to the Board, as applicable, or the Board will formulate an annual action plan ("Annual Action Plan") which shall include the following, namely:-

(a) the list of CSR projects that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;

(b) the manner of execution of such projects;

(c) the modalities of utilization of funds and implementation schedules for the projects;

(d) monitoring and reporting mechanism for the projects; and

(e) details of need and impact assessment, if applicable.

ANNEXURE A

Core Themes	Sub Themes
Healthcare	1. Eradicating hunger, poverty and malnutrition, Indicative activities under eradicating hunger / malnutrition in the above category shall include meal programs or providing meals or necessary resources and infrastructure to Non-Governmental Organizations or Bodies for implementation of the above. 2. Promoting health care including preventive healthcare. The Company intends to support this by providing funds to the needy Hospitals or healthcare centers run by NGOs to acquire healthcare tools, technologies, equipments and support needy people in terms of funding their treatment. 3. Sanitation including contribution to notified funds set up by the Central government for the purpose of sanitation. Sanitation is one of the primary requirements for a healthy and sustainable society. Recognizing this, the Company will focus on activities that promote sanitation which will ensure better standard of living and health for the society. 4. Making available safe drinking water. Indicative activities under this will include, collaborating with empaneled NGO's for funding (partly or wholly) the setting up of a plant, to produce safe drinking water and supporting long term supply of safe drinking water.
Education	1. Promoting education including special education and employment enhancing vocational skills especially among Children, women, elderly and differently abled. Indicative programs under this head will include funding of projects, measures or activities by empaneled NGOs to provide education to children including specially-abled children, unemployed youth, adult education and allied activities. Skill development amongst youth and the working age population will also be a thrust area under this thread. Since education is a continuous process, this program will include funding for partial or full construction of school buildings or purchase by the NGO of furniture and other equipments and / or operational expenses in furtherance of the above processes. 2. Livelihood enhancement projects. Indicative activities under this head include funding of projects run by NGOs to support development of skill and art of the economically backwards to enhance their livelihood. This will be achieved by funding of proposals to acquire necessary tools, equipments and other materials for implementing the above processes.

Empowerment	1. Promoting gender equality. As a part of supporting Gender equality in the society, Deloitte will support projects and activities that are in furtherance of this objective. 2. Empowering women Indicative activities for empowerment of women shall include supporting the NGOs which are implementing such programs for skill development, training and livelihood support of women. 3. Setting up home and hostels for women and orphans, old age homes, day care centers including for senior citizens. Orphans, senior citizens and women rescued from trafficking etc. are vulnerable section of the society that need special support and safeguarding to help them lead a better life. For supporting such requirements, the Company under this head will fund the projects, activities or programs proposed or run by NGOs encompassing setting up and running of orphanages, institutions, child support centers and schools with such special purpose for safeguarding them. Indicative activities will also include funding of operational activities and support infrastructure for the above. 4. Reducing inequality faced by socially and economically backward groups. Reduction of inequality in all aspects of life will help in better welfare in the society. The Company aims to implement this in tandem with other programs under this CSR policy.
Ecology	1. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources. Indicative activities under this category will include funding the proposals, activities or projects by NGOs for setting up, running and maintaining shelter homes and veterinary centers for animals. For protection of flora (plants and forests), indicative activities will include supporting NGOs in activities and programs relating to afforestation and environmental sustainability programs. 2. Maintaining quality of soil, air and water including contribution to funds set up by the Central Government for the rejuvenation of the River Ganga. Indicative activities under this head will include supporting projects, activities and proposals by NGOs working for supporting environment, ecology and sustainability. The Central Government in India has set up certain funds which are utilized for protection and cleaning of the River Ganga which is the largest river in India. Contributions made to the funds for protection of river Ganga are considered as eligible CSR spends.

Government Funds	Prime Minister Relief Fund Contribution to the Prime Minister's national relief 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 and contributions to such funds by the Company are considered as eligible CSR spends.
Disaster Management	Disaster management, including relief, rehabilitation and reconstruction activities Contribution towards • activities to prevent disaster, • activities to reduce the impact of the disaster and its long term effect, • recovery activities like reconstruction and rebuilding infrastructure, health care etc.