Stellar
Corporate Social Responsibility Policy

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ADMINISTRATOR RESPONSIBLE	HUMAN RESOURCE	CONTACT INFORMATION	hrd@stellarinfo.com

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VERSION	APPROVED BY	REVISION ON	DESCRIPTION OF CHANGE	AUTHOR
1.0	Mr. Manoj Dhingra	01.09.2017	New document	Ms. Bhavana Verma
1.1	Mr. Manoj Dhingra	01.10.2021	Revision	Mr. Saurabh Srivastava
1.2	Mr. Manoj Dhingra	01.05.2024	Revision	Mr. Saurabh Srivastava
1.3	Mr. Manoj Dhingra	31.05.2024	Revision	Mr. Kulkesh Kumar

APPROVAL AND REVIEW

Prepared By	**HR Team**	
Reviewed By	**Head-Human Resource**	Mr. Kulkesh Kumar
Approved By	**Director- India Business**	Mr. Manoj Dhingra

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1. CONCEPT

1.1 INTRODUCTION

Stellar is one of the pioneer's in data recovery industry in India and has been providing a wide range of data recovery services & Solutions since 1993. As required under the provision of section 135 of the Companies act, 2013, the company is pleased to announce its Corporate Social responsibility Policy. Our goal shall be to focus on CSR activities strictly in compliance with applicable laws from time to time in force, including the act and the rules thereunder. Stellar is committed to operate its Data recovery business in a socially responsible way with a vision of promoting sustainable development. Towards this purpose, the policy has been designed to achieve the company's social goals, while satisfying the required statutory obligation. The CSR policy of Stellar encompasses the company's philosophy for portraying its responsibility as a corporate citizen and lays down the guidelines and mechanism in this regard.

1.2 DEFINITION

Stellar's Corporate Social Responsibility (CSR) policy is the company's commitment to operate in an economically, social and environmentally sustainable manner to enhance the company's overall contribution to society.

CSR committee is the internal committee of Stellar team members which decides the CSR initiatives to be taken for pursuing CSR activities.

1.3 PURPOSE

1.3.1 To portray Stellar's CSR policy and to generate a community goodwill for the company and reinforce a positive and socially responsible image of Stellar.

1.3.2 To explain the methodology for undertaking CSR initiatives by the company.

1.3.3 To take up CSR programs anywhere across the country directly and indirectly that benefits the society.

1.4 SCOPE

The CSR policy of Stellar is applicable across the company and will cover activities designated under planned CSR initiative.

1.5 CSR COMMITTEE

CSR committee shall be constituted by the board of directors of the company. The roles, responsibilities and functioning of the CSR committee shall be as provided below:

CONSTITUTION:

CSR committee shall consist of three members of the board of directors of the company at any given point of time and two of the employees can be added/changed in the list if approved by BOD.

The CSR committee will consist of the following members:

- Mr. Sunil Chandna- Director Sales and CEO
- Mr. Manoj Dhingra- Director India Business
- Mr. Kuljeet Singh- Director R&D
- Mr. Sanjeev Kumar- Assistant General Manager- Accounts & Finance
- Mr. Kulkesh Kumar- Head-Human Resource

Any change in the composition of the CSR committee will be based on approval of the BOD of the company.

Membership: Membership of the CSR committee is restricted to the BOD of the company and the other two members can be changed by the directors anytime during the calendar year.

The CSR committee may invite experts from variable fields or officers or employees of the company to attend its meeting and provide such experts views, comments updates, information/clarification or for such other purpose as the CSR committee deems necessary for CSR activities of the company.

1.6 RESPONSIBILITIES OF THE CSR COMMITTEE:

CSR committee shall:

- Formulate and recommend the CSR policy and indicate the activities to be undertaken.
- The CSR plan has to be designed and approved by the Board of Directors in advance.
- Recommend the amount of expenditure to be incurred by the company in each financial year in relation to the CSR activities. Such expenditure shall be calculated in accordance with the provisions of the act which is at the rate of 2% of average PBT of last 3 years at present.
- Undertake all necessary steps to implement the CSR activities.
- Monitor the CSR activities from time to time.

1.7 OBJECTIVES

The CSR policy of Stellar intends to encourage a positive impact through its activities on promoting education, reducing child mortality and improving maternal health.

2. FUNDING AND ALLOCATIONS

Stellar shall follow the government guidelines issued for undertaking CSR activities. Stellar will receive CSR project request throughout the year and the CSR committee will evaluate the proposals those may be received from or through a registered trust/NGO. The CSR projects will be privatized by assessing their impact. Stellar's CSR committee will deliberate on the proposal and approve the proposal/s for implementation at its discretion.

CSR budget shall be percentage of PBT in accordance with the prevailing guidelines of the ministry of corporate affairs, Govt. of India. As per the govt. guidelines presently 2% of PBT is applicable for CSR activities of the company. The CSR expenses will be reflected in the balance sheet of the company. The CSR budget is non lapsable and any unspent amount or unutilized allocated budget in any financial year will be carried forward to next financial year.

3. AREAS OF OPERATIONS

The following areas have been identified for CSR projects:

3.1 Promotion of education

3.2 Reducing child mortality and improving maternal health

4. EXCLUSIONS

4.1 CSR amount shall not be utilized on activities that benefit the employees and their families

4.2 No expense on Political and similar initiatives

4.3 No expense for any activity overseas – except for sponsoring sports person in international event

5. LOCATION OF CSR ACTIVITIES

The CSR committee will decide the location of CSR activities.

6. SELECTION OF CSR PARTNERS

6.1 CSR partner shall either be a registered trust or a registered society under the applicable laws or a company incorporated under section 8 of the act with an established track record of 3 years in undertaking activities in the focus areas in which the company intends to carry out the CSR activities.

6.2 The Board of directors or the trustees or the management committee members or governing body members of the CSR partner, as the case may be, or the members of the CSR partner or the CSR partner itself, shall not in any way be, directly or indirectly, connected with any political parties and the CSR partners should not be, directly or indirectly, promoted by political parties.

6.3 CSR partner shall not be engage in religious or political activities, for private benefit of the CSR partner. CSR partner shall not discriminate on the basis of race, color, religion sex, age, national origin, citizenship status, disability, sexual orientation, veteran status, political affiliation or any other protected status.

6.4 The board of directors or the trustees or the management committee members or governing body members of the CSR partner, as the case may be, or the member of CSR partner should not be adjudicated as an insolvent or convicted by a court of any offence involving moral turpitude.

6.5 CSR partner should not be or should not have been a party at any time to bankruptcy or insolvency or winding up proceeding or to proceeding involving a composition of creditors, or should not make or should not have at any time made an assignment for the benefit of creditors. Custodian, receiver or any other person with like power should not have been appointed to take charge of or a resolution should have been passed for the winding-up or liquidation or any corporate proceeding for its liquidation, winding up or dissolution shall have been commenced.

6.6 CSR partner should have complied with the applicable laws and no notice for non-compliance under any applicable laws should have been received from any authorities.

6.7 CSR partner should have audited its accounts for each of the financial years from the date of its existence and the financial statements should reflect trust and fair view of its affairs.

6.8 The company shall satisfy itself on the legal, financial and regulatory aspects of the CSR partner to ensure ability to carry out CSR activities on behalf of the company.

6.9 The CSR committee shall discuss the CSR policy and the objectives of the company in this regard with the proposed CSR partners.

6.10 The company shall procure a detailed project report from the shortlisted CSR partners regarding the course of action that they intend to undertake, if chosen to implement a particular CSR activity on behalf of the company.

6.11 The company shall, before executing the projects with CSR partners, ensure that the specifications for the project or the program to be undertaken through CSR partners, the utilization of funds on such projects and programs and the monitoring and reporting mechanism are made clear.

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7. IMPLEMENTATION

7.1 The Board shall ensure that the CSR activities are undertaken by the company itself or through:

- a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company,
- a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

7.2 The Board to ensure that every entity who intends to undertake any CSR activity, shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar.

7.3 The CSR project if implemented by Contributing CSR amount to fund mentioned under the Schedule VII of the Act and the CSR contribution should be approved by one of the Director before implementation.

8. MONITORING

A consolidated quarterly report on all ongoing and planned projects implemented through CSR partner or through any NGO / Registered society should be received from the CSR partner by the Head-Human Resource and will be forwarded to accounts department of Stellar for further compliance.

9. IMPACT ASSESSMENT

The closure report of the CSR project detailing an impact assessment shall be prepared on completion and should be presented to the management and core group at the end of the fourth quarter of every financial year.

10. POLICY REVIEW AND FUTURE AMENDMENT

The CSR committee shall review the CSR policy from time to time and make suitable changes as may be required and submit the same for approval of the board of directors of company.

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