

Corporate Social Responsibility (“CSR”) Policy

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Recipients

Entity Credit Suisse Business
Analytics (India) Private Limited



Credit Suisse Business Analytics (India) Private Limited

The CSR Policy means Corporate Social Responsibility Policy framed for the Company as required under the Companies Act, 2013 with the Companies (Corporate Social Responsibility Policy) Rules, 2014. The CSR Policy lays down guidelines and mechanisms to be adopted by the Company in order to carry out CSR activities in accordance with the Act and other directions and clarifications issued by the Ministry of Corporate Affairs from time to time.

Scope

Company means Credit Suisse Business Analytics (India) Private Limited.□

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1 Policy for Corporate Social Responsibility

1.1 Definitions

1. **“Company”** means Credit Suisse Business Analytics (India) Private Limited.
2. **“CSR Committee”** means a committee constituted by the Board of the Company.
3. **“CSR Policy”** means Corporate Social Responsibility Policy framed for the Company as required under the Companies Act, 2013 with the Companies (Corporate Social Responsibility Policy) Rules, 2014. The CSR Policy lays down guidelines and mechanisms to be adopted by the Company in order to carry out CSR activities in accordance with the Act and other directions and clarifications issued by the Ministry of Corporate Affairs from time to time.
4. **“Board”** means the Board of the Company.
5. **“Implementing Agency/Agencies”** refers to the body that will undertake and implement the CSR activities for the Company:
 - 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, established by the company, either singly or along with any other company; or
 - 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
 - any entity established under an Act of Parliament or a State legislature; 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; or
 - a company holding unique CSR Registration Number (obtained with effect from April 1, 2021 on registration on the MCA portal by filing Form CSR-1).
6. **“CSR activities”** means projects and programs to be carried out by the implementing agencies on behalf of the Company, as may be approved by the Board in terms of this CSR Policy.

1.2 Introduction

The CSR Policy has been developed in accordance with Section 135 of the Companies Act, 2013 (“Act”) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereby collectively referred to as the “Act” in this CSR Policy document) notified by the Ministry of Corporate Affairs, Government of India and as amended from time to time.

1.3 Vision and objectives

The CSR Policy reflects the Company's broad understanding of its duties as a global financial services provider, employer and member of society. More specifically, the Company is committed to playing its part in shaping a more inclusive future where all people can access the resources and develop the financial, entrepreneurial and other skills to thrive in the economy and society.

1.4 Applicability, Validity & Review

The CSR Policy shall apply to all CSR activities initiated by the Company. The CSR Committee shall formulate and recommend the CSR Policy to the Board. Based on the recommendations of the CSR Committee, the Board shall review and approve the CSR policy once in a year or at any other intervals in case of any change in the Act and may amend the same as per the requirement of the Company.

1.5 CSR Funding

The CSR Budget will be allocated as per the provisions of the Act i.e. at least two per cent of the average net profit of the three immediately preceding financial years computed in accordance with provisions of Section 381 and Section 198 of the Companies Act, 2013.

The Board will endeavor to spend in each financial year at least 2% of the average net profit of the Company made during the three immediately preceding financial years on CSR Activities and shall ensure that the administrative overheads/capacity building shall not exceed five percent of total CSR expenditure of the Company for the financial year including administrative overheads/capacity building budget of up to 5% of the total CSR Budget.

CSR activities will be identified and budgets will be allocated through a process incorporating identification of suitable implementing agencies, necessary due diligence, clear outlining of the need and the desired outcomes of the activity and monitoring of this outcome at the end of the activity period.

If the Company is having average CSR obligation of ten crore rupees or more in the three immediately preceding financial years, the Company shall undertake impact assessments, through an independent agency, of CSR Projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

A Company may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programs in accordance with these rules.

1.6 Surplus

Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same activity or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

1.7 Excess CSR expenditures

When the Company spends an amount in excess of requirement provided under the Act, such excess amount may be set off against the requirement to spend under the Act up to immediate succeeding three financial years in accordance with the Act.

1.8 Unspent CSR spends

Any amount remaining unspent pursuant to an ongoing project shall be transferred by the Company within a period of 30 days from the end of the financial year to a special account to be opened by the Company in that behalf for that financial year in any scheduled bank to be called the "Unspent Corporate Social Responsibility Account", and such amount shall be spent by the Company towards the CSR Policy within a period of 3 financial years from the date of such transfer or the Company shall transfer the same to a Fund specified in Schedule VII of the Act, within a period of thirty days from the date of completion of the third financial year. If the unspent amount doesn't relate to any ongoing project, the Company transfer such unspent amount to a Fund specified in Schedule VII of the Act, within a period of six months of the expiry of the financial year.

1.9 Strategic focus areas

Activities funded by the Company will be carried out in partnership with credible implementing agencies. All activities are aligned and within the scope of the Schedule VII of the Act.

CSR Activities cover one or more of the five following themes:

- Future Skills.
- Financial Inclusion.
- Financial Education.
- Quality and Inclusive Education.
- Environment, Sustainable Livelihoods and Community Development.

1.9.1 Future skills

Our main goal

Equip disadvantaged young people with skills and education for a productive future and close the educational/employment gap as they enter adulthood.

Objectives

- Support programs or organizations that provide direct support to young people to facilitate access to education and skills essential to succeed.
- Support programs or organizations that strengthen the education system and the structures and professionals within this system to be more effective and impactful.
- Support programs or organizations that work towards an enabling environment to address external barriers effecting specific sub-sets of disadvantaged young people to access education and/or employment.

1.9.2 Financial inclusion

Financial Inclusion is about the provision of financial products and services to people that are commonly excluded from the traditional banking sector (e.g. women entrepreneurs receiving loans to build their businesses, smallholder farmers receiving loans or insurance to increase their yield, parents receiving loans or savings products to improve the family's education or health care, or individuals receiving savings products to increase their personal security). Financial Inclusion is not a SDG in itself but is seen as an enabler of many other SDGs like no poverty (SDG 1), access to education (SDG 4) or gender equality (SDG 5).

Our main goal

Expand access to high-quality, affordable financial products and services.

Objectives

- Support access to basic and formal financial services.
- Support financial product and services development and innovation.
- Support expansion of existing products and services into new markets in the APAC region.
- Support development of strong industry partnerships and knowledge sharing.

1.9.3 Financial education

Our main goal

Improve the financial education and skills of disadvantaged people.

Objectives

- Support development of financial education capacity for our Future Skills and Financial Inclusion partners.
- Support financial Education programs for schools, colleges and other educational institutions.

1.9.4 Quality and inclusive education

Our main goal

Improve access to quality and inclusive education for disadvantaged communities.

Objective

- Support access to preschool, primary and secondary education for disadvantaged communities.

1.9.5 Environment, sustainable livelihoods and community development

Our main goal

Protect the environment, promote sustainable livelihoods and build community resilience.

Objectives

- Support programs and initiatives that promote environmental protection.
- Support initiatives aimed at creating and promoting sustainable livelihoods and resilience for disadvantaged communities.

1.10 Disaster Relief

CSR funds can also be used to respond to natural disasters in India through one-off donations and matching staff donations. This includes contributions to disaster relief agencies and other organizations responding to disasters or other crises as well as the Prime Minister's national relief fund [or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the Central Government for socio economic development, relief and welfare of the scheduled caste, tribes, other backward classes, minorities and women.

1.11 CSR Eligibility

The following guidelines apply only to the implementing agencies falling under the following categories: Future skills; Financial inclusion; Financial education; Quality and inclusive education; Environment, sustainable livelihoods and community development.

1.12 Geographical Coverage

Priority shall be given where:

- There is a social need that the Company can meet through its CSR activities, and/or where Credit Suisse has an office in Maharashtra.
- If proposed activities are aligned with the Company's CSR strategic focus areas then preference would be given to take up the project irrespective of the geographical location within India.

1.13 Exclusions

Credit Suisse CSR funding does not support the following activities:

- Individual scholarships, study or course expenses.
- Standalone music, art or sports education programs.
- Fundraising events (including gala dinners).
- Concerts, festivals and similar events.
- Leisure activities (e.g. holiday camps, graduation ceremonies, events, etc.).
- Sponsorship events.
- Publications, production of materials.
- Projects with a solely commercial background.
- Loans and deficit guarantees.
- Membership fees.

Credit Suisse CSR funding does not support the following organizations:

- Synagogues, churches, mosques or temples. However, some community service programs sponsored by religious groups may be eligible.
- Museums and exhibition spaces.
- Political or fraternal organizations.

- Institutions that discriminate on the basis of race, religion, age, physical ability or sexual orientation.

Programs not eligible for funding:

- Music, sport, art and religious education.

Implementing agencies are required to be generally aligned with Credit Suisse's ESG framework. Specifically, the activities of the grantee should support the UN Sustainable Development Goals and schedule VII of the Act, and none of its activities should undermine those goals.

1.14 Governance Structure

India CSR activities are governed by the India Philanthropy Committee (IPC). The IPC consists of a minimum of six members and a maximum of 10 members as well as the Chair. The IPC includes at least one member from the **Board**.

IPC shall review and recommend to the CSR Committee the list of CSR activities to be undertaken in areas or subjects specified in Schedule VII of the Act and in accordance with the CSR Policy, the manner of execution, modalities of utilization of funds and implementation, monitoring and reporting mechanism and impact assessment if any. Based on IPC's recommendation, the CSR Committee will review and propose to the **Board** the annual action plan covering the above details, amount of expenditure to be undertaken on CSR activities and monitor the CSR Policy from time to time.

The Corporate Citizenship and Foundations (CCF) team is responsible for the day-to-day management of the activities and for ensuring the alignment of the India CSR policy and Company strategy.

The Board shall approve the CSR activities and have oversight on the implementation and monitoring of the activities including but not limited to ensuring that the funds disbursed have been utilized for the purposes and in the manner as approved by it.

1.15 Reporting

The IPC and CSR Committee shall maintain proper minutes of all its meetings.

The Annual Report of the Company shall include a report on CSR activities containing the particulars set out in Annexure A to this CSR Policy and such other details as may be prescribed from time to time under the Act.

1.16 Amendment

The Board may, subject to compliance with applicable law, at any time alter, amend or modify the CSR Policy based on recommendations of the CSR Committee, as it deems fit to comply with the statutory obligation of the Company to undertake the CSR Activities.

2 Annexure – A

Format for the Annual Report on CSR Activities to be Included in the Board's Report for Financial Year Commencing on or After 1st Day of April, 2020

1. Brief outline on CSR Policy of the Company.

2. Composition of CSR Committee:

Sl. No.	Name of Director	Designation/ Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year

3. Provide the web-link where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company.

4. Provide the details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social responsibility Policy) Rules, 2014, if applicable (attach the report).

5. Details of the amount available for set off in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social responsibility Policy) Rules, 2014 and amount required for set off for the financial year, if any:

Sl. No.	Financial Year	Amount available for set-off from preceding financial years (in Rs)	Amount required to be set-off for the financial year, if any (in Rs)
1			
2			
3			
Total			

6. Average net profit of the company as per section 135(5).

7. (a) Two percent of average net profit of the company as per section 135(5).

(b) Surplus arising out of the CSR projects or programmes or activities of the previous financial years.

(c) Amount required to be set off for the financial year, if any.

(d) Total CSR obligation for the financial year (7a+7b-7c).

8. (a) CSR amount spent or unspent for the financial year:

Total Amount Spent for the Financial Year (in Rs.)	Amount Unspent (in Rs.)				
	Total Amount transferred to Unspent CSR Account as per section 135(6)		Amount transferred to any fund specified under Schedule VII as per second proviso to section 135(5)		
	Amount	Date of transfer	Name of the Fund	Amount	Date of transfer

(b) Details of CSR amount spent against ongoing projects for the financial year:

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	(9)	(10)	(11)	
Sl. No.	Name of the Project	Item from the list of activities in Schedule VII to the Act	Local area (Yes/No)	Location of the project		Project duration	Amount allocated for the project (in Rs.)	Amount spent in the current financial Year (in Rs.)	Amount transferred to Unspent CSR Account for the project as per Section 135(6) (in Rs.)	Mode of Implementation – Direct (Yes/No)	Mode of Implementation – Through Implementing Agency	
				State	District						Name	CSR Registration no.
1.												
2.												
3.												
	Total											

(c) Details of CSR amount spent against **other than ongoing projects** for the financial year:

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	
Sl. No.	Name of the Project	Item from the list of activities in schedule VII to the Act	Local area (Yes/No)	Location of the project		Amount spent for the project (in Rs.)	Mode of implementation – Direct (Yes/No)	Mode of implementation – Through implementing agency	
				State	District			Name	CSR registration number
1.									
2.									
3.									
	Total								

- (d) Amount spent in Administrative Overheads.
- (e) Amount spent on Impact Assessment, if applicable.
- (f) Total amount spent for the Financial Year (8b+8c+8d+8e).
- (g) Excess amount for set off, if any:

Sl. No.	Particular	Amount (in Rs.)
(i)	Two percent of average net profit of the company as per section 135(5)	
(ii)	Total amount spent for the Financial Year	
(iii)	Excess amount spent for the financial year [(ii)-(i)]	
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any	
(v)	Amount available for set off in succeeding financial years [(iii)-(iv)]	

9. (a) Details of Unspent CSR amount for the preceding three financial years:

Sl. No.	Preceding Financial Year	Amount transferred to Unspent CSR Account under section 135 (6) (in Rs.)	Amount spent in the reporting Financial Year (in Rs.)	Amount transferred to any fund specified under Schedule VII as per section 135(6), if any			Amount remaining to be spent in succeeding financial years (in Rs.)
				Name of the Fund	Amount (in Rs.)	Date of transfer	
1.							
2.							
3.							
	Total						

(b) Details of CSR amount spent in the financial year for ongoing projects of the preceding financial year(s):

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Sl. No.	Project ID	Name of the Project	Financial Year in which the project was commenced	Project duration	Total amount allocated for the project (in Rs.)	Amount spent on the project in the reporting Financial Year (in Rs.)	Cumulative amount spent at the end of reporting Financial Year (in Rs.)	Status of the project – Completed/ Ongoing
1								
2								
3								
	Total							

10. In case of creation or acquisition of capital asset, furnish the details relating to the asset so created or acquired through CSR spent in the financial year.

Asset-wise details:

- (a) Date of creation or acquisition of the capital asset(s).
- (b) Amount of CSR spent for creation or acquisition of capital asset.
- (c) Details of the entity or public authority or beneficiary under whose name such capital asset is registered, their address etc.
- (d) Provide details of the capital asset(s) created or acquired (including complete address and location of the capital asset).

11. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5):

Sd/-
(Chief Executive Officer or
Managing Director or Director).

Sd/-
(Chairman CSR Committee).

Sd/-
[Person specified under clause
(d) of sub-section (1) of section
380 of the Act] (Wherever
applicable).
