



Corporate Social Responsibility (CSR) Policy

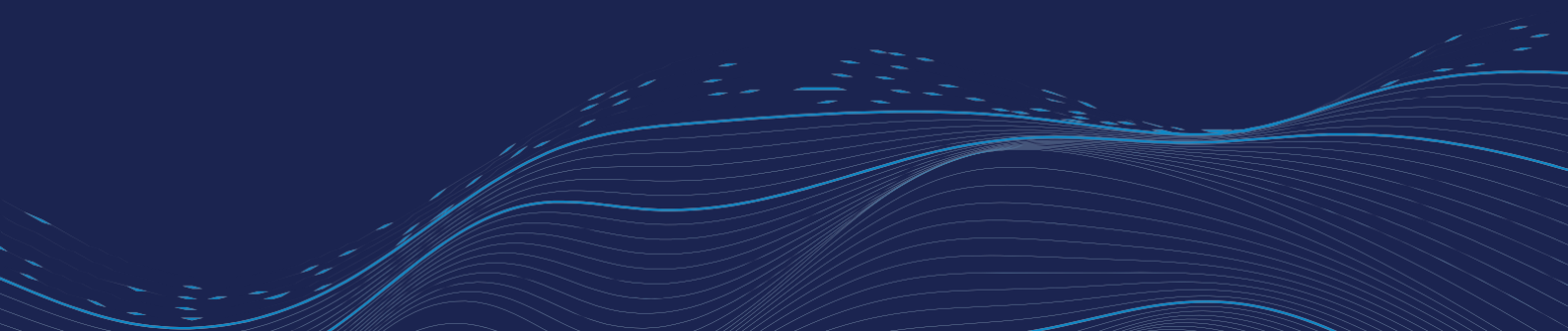


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The Board of Directors ("Board") of Fractal Analytics Limited (the "Fractal") acting upon the recommendation of its directors and the Corporate Social Responsibility ("CSR") Committee, has amended and adopted the following policy and procedures with regard to the Company's Social Responsibility at their meeting held on February 9, 2018.

Fractal's Corporate Social Responsibility Philosophy

We seek to integrate usage of our core expertise to achieve greater social impact. Creating shared value in an identified social problem arena, that we are equipped to help resolve. And from where the greatest community benefit can be gleaned.

We seek to accomplish these goals by creative

partnering with the government, non-profit sector, public-private partnerships and the local community.

Fractal contributes financial support, employee volunteering (teaching and mentorship) hours as well as its Analytics and Artificial Intelligence capabilities to its CSR projects. To influence better outcomes.

Fractal's CSR Objectives

At Fractal, our corporate social responsibility (CSR) objectives are -

- (a) Enhancing equitable educational outcomes for disadvantaged children
- (b) Empowering women to be financially independent and
- (c) Improving quality & affordability of healthcare, radiological expertise and provision of safe housing solutions.

Introduction

Fractal seeks to be a workplace of choice for those who seek to pursue professional, personal and social goals with a high degree of passion. We seek to integrate usage of our core expertise to achieve greater social

impact. Creating shared value in an identified social problem arena, that we are equipped to help resolve. And from where the greatest community benefit can be gleaned.

An elaboration of our CSR Objectives

(a) Enhancing equitable educational outcomes for disadvantaged children

- At Fractal, we believe that all children have a right to high quality basic education. That this access to education is among the important first steps towards breaking out of inter-generational poverty. We seek to help disadvantaged children resident in the urban slums of Mumbai, Bengaluru and/or Gurugram by supporting our carefully chosen CSR partners. We contribute financial aid, volunteering hours and organizational best practices to our CSR partners.

The Fractal CSR team maintains proximity to our CSR projects and facilitates collaboration between

volunteer teams and Fractal's CSR partners to enhance desired outcomes.

- Along with our partners, we address some of the key barriers to delivering quality education – by funding schools located near or within the communities where school age children are resident, better equipping classrooms with learning aids, sponsorship of well-trained and committed teaching staff and by designing volunteering opportunities that provide high quality beyond community exposure to students of our partner schools.

(b) Empowering women to be financially independent

- Empowering women to augment their family income, increase their share of family income or increase their savings towards desired goals almost always benefits an entire family unit. At Fractal, we actively encourage procurement of company supplies, mementoes and giveaways from collectives run by women for the upliftment of the economically disadvantaged. Regular CSR bazaars held at various office locations encourage lady artisans, entrepreneurs to exhibit and connect with potential customers amongst our colleagues. Some such collectives have included women

weavers from Madhya Pradesh, sustainable textile and stationery manufacturers from Karnataka, upcycled paper product manufacturers from Tamil Nadu. The Fractal CSR bazaars are popular and anticipated events that often symbolize the beginning of shopping for festive occasions amongst Fractal colleagues.

- Fractal's work with its CSR partners also sees it contribute towards skill enhancement and financial inclusion of lady employees in the educational institutions supported by Fractal.

*(c) Improving quality & affordability of healthcare,
radiological expertise and provision of safe housing solutions*

- Over the last few years the convergence of Big Data and technology have posed an interesting question – whether organizations can leverage Big Data for social impact. At Fractal, we are committed to using our expertise in Analytics and Artificial Intelligence (AI) to help our CSR partners achieve better outcomes and create greater social impact.

- Our deep expertise in AI (our solutions in healthcare imaging data and beyond), Machine Learning (discovering interconnectedness) and Analytics (our expertise in converting raw data into illuminating insights) also lend well to our ‘problem-solver’ volunteering track at Fractal. We continue to identify and address potential areas of collaboration with our experienced CSR partners.

Fractal's Approach

We seek to accomplish these goals by creative partnering with the government, non-profit sector, public-private partnerships and the local community. Fractal contributes financial support, employee volunteering (teaching and mentorship) hours as well as its Analytics and Artificial Intelligence capabilities to its CSR projects. To influence better outcomes.

Alignment of Fractal's CSR Objectives with Schedule VII of the Companies Act, 2013

As listed under Schedule VII of The Companies Act, 2013, Fractal shall undertake and align its CSR Objectives with any of the following activities/projects or such other activities/projects, as may be notified by the Ministry of Corporate Affairs ("MCA") from time to time as a part of CSR or contribute to corpus of Trust/Society/section 8 companies as may be prescribed by MCA or under the Act:

1. Eradicating extreme hunger and poverty;
2. promotion of education;
3. promoting gender equality and empowering women;
4. reducing child mortality and improving maternal health;
5. combating human immunodeficiency virus, acquired immune deficiency syndrome, malaria and other diseases;
6. ensuring environmental sustainability;
7. employment enhancing vocational skills;
8. social business projects;
9. contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and funds for the welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women; and
10. Such other matters as may be prescribed.

Presently, Fractal is primarily engaged with NGOs in improving educational outcomes for disadvantaged children and in empowering women by participating in various initiatives listed under Schedule VII of The Companies Act. Some elements of Fractal's CSR program(s) are drawn from the examples listed alongside:

- Scholarship Programs for education
- Providing infrastructure and other learning aids
- Participating for a cause through events
- Teaching, mentorship and reading Programs through school libraries
- Training and enhancing skills of underprivileged women and children

Composition of the CSR Committee

Fractal's CSR governance structure is headed by the Board level members, who are responsible for the CSR Policy of the Company and report to the Board, as may be required, pursuant to the applicable provisions of the Companies Act, 2013. The Committee consists of the Directors mentioned below.

1. Mr. Rohan Haldea
2. Mr. Gulu Mirchandani
3. Mr. Srikanth Velamakanni

Responsibilities of the CSR Committee

- To formulate and recommend to the Board, a CSR policy
- To review and recommend for the approval of the Board, the amount of expenditure to be incurred on the CSR activities to be undertaken by Fractal
- To monitor the CSR Policy, the CSR activities and to report to the Board from time to time.

Responsibilities of the Board of Directors

The Board of Directors of Fractal is responsible for -

- Approving the CSR policy as formulated by the CSR committee or any modifications thereunder;
- Ensuring that every financial year funds committed by the Company for CSR activities are utilized effectively;
- Monitoring implementation of the CSR Policy by the CSR committee regularly;
- Disclosing the contents of the policy in its report annually, in the prescribed format and ensuring annual reporting of its CSR activities on Fractal's website.

The CSR Budget

Fractal will strive to spend in every financial year at least 2% of the average net profits of the Company, made during the three immediately preceding financial years.

The Treatment of Surpluses

Any surplus generated from CSR projects undertaken by Fractal will be tracked and channelized into Fractal's CSR corpus. These funds will be further used towards the development of the CSR projects and will not be added to the normal business profits.

Key Operating Principles

Fractal may undertake CSR activities through a registered trust or society or any company, established by the Company, its holding or subsidiary company under section 8 of the Act for such non-for-profit objectives. Provided that the Company can carry out the CSR Activities through such other institutions having an established track record of 3 (three) years in undertaking the CSR Activities.

Fractal may collaborate with other companies for undertaking the CSR activities subject to fulfillment of separate reporting requirements as prescribed in the Companies (Corporate Social Responsibility Policy) Rules, 2014.

Apart from Fractal's CSR initiatives as an organization, Fractal may also provide an opportunity to its India based employees to participate and contribute to the CSR initiatives by providing up to certain amount of their time to any CSR initiative, which may be in the form of employees' unbilled utilization or through payroll giving, where employees may contribute a specified amount for CSR activities and Fractal may match the total amount of employee contribution, as the case may be.

Fractal may partner with the government, non-profit sector, public-private partnerships and the local community towards achievement of its CSR objectives.



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