



CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR)*

- Xiaomi Technology India Private Limited

**This policy has been instituted based on the Corporate Social Responsibility (CSR) philosophy of Xiaomi Technology India Private Limited and provisions of Section 135 of the Companies Act, 2013, read with Schedule VII of the Companies Act, 2013, Companies (Corporate Social Responsibility Policy) Rules, 2014 and the notifications and circulars issued by the Ministry of Corporate Affairs from time to time.*

XIAOMI TECHNOLOGY INDIA PRIVATE LIMITED

CIN: U72200KA2014FTC076704

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Marathahalli-Sarjapur Outer Ring Road, Bengaluru-560103

Tel: 91 80 46617900; **E-mail:** ind-corpcomm@xiaomi.com; **Website:** www.mi.com/in



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A. INTRODUCTION:

M/s. **XIAOMI TECHNOLOGY INDIA PRIVATE LIMITED** ('Xiaomi' or 'the Company') is committed to undertake CSR activities in accordance with the CSR Regulations.

The Company believes that corporate growth and development should be inclusive and every corporate has to be responsible and contribute towards betterment of the society that can build a national enterprise. The Company wishes to commit itself to contribute to the society in ways possible for the organization.

To further the Company's CSR philosophy, the Board has constituted "**Xiaomi Technology India CSR Committee**" as its core CSR team, as a means of fulfilling this commitment.

B. DEFINITIONS:

Act	The Companies Act, 2013, as amended and modified from time to time;
Areas of Interest/Objective	The focus areas / areas of interest as identified by the Company for implementing CSR goals in accordance with the CSR Regulations and as specified in Paragraph D of this CSR Policy read with Schedule VII of the Companies Act, 2013 as amended from time to time;
Board/Board of Directors	Means the collective body of the directors of the company;
Company/Xiaomi	Xiaomi Technology India Private Limited;
Committee	Committee means CSR Committee formed by the Board of Directors of the Company;
CSR	Corporate Social Responsibility;
Xiaomi Technology India CSR Committee	The Committee of the Board constituted to implement, supervise and manage the CSR initiatives of the Company in accordance with the CSR Policy of the Company and the provisions of the CSR Regulations, as amended from time to time;
CSR Commitment	In respect of a financial year, shall mean at least 2% (Two Percent) of the average Net Profits of the Company made during the 3 (Three) immediately preceding financial years or such minimum contribution as prescribed under the CSR Regulations, as amended from time to time;
CSR Policy	The CSR Policy of the Company, as amended from time to time;
CSR Regulations	Section 135 of the Act, as amended from time to time, the Companies (Corporate Social Responsibility) Rules, 2014, as amended from time to time and the notifications and circulars issued by the Ministry of Corporate Affairs from time to time, collectively;
CSR Rules	The Companies (Corporate Social Responsibility) Rules, 2014, as amended from time to time;
Net Profit	shall have the meaning ascribed to it in the CSR Rules;

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Organizations/ Implementing Agencies	Means an entity amongst the following categories and having unique CSR registration number issued by Ministry of Corporate Affairs (MCA): i. A company established under section 8 of the Companies Act, 2013 with section 12A and section 80G registrations under the Income Tax Act, 1961, established by the company, either singly or along with any other company OR having an established track record of at least three years in undertaking similar activities. ii. Registered Public Trust with section 12A and section 80G registrations under the Income Tax Act, 1961, established by the company, either singly or along with any other company or having an established track record of at least three years in undertaking similar activities. iii. Registered Society with section 12A and section 80G registrations under the Income Tax Act, 1961, established by the company, either singly or along with any other company or having an established track record of at least three years in undertaking similar activities. iv. Company established under section 8 of the Companies Act, 2013 or Registered Trust or Registered Society established by the Central Government or State Government. v. Entity established under an Act of Parliament or State Legislature.
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C. CSR PROJECTS, PROGRAMMES AND ACTIVITIES:

The Company may undertake various CSR projects, programs and activities from time to time. The Company may also contribute towards any existing or ongoing CSR projects, programs and activities. Such projects, programs and activities will be undertaken keeping in mind the CSR philosophy of the Company and in alignment with the permissible activities under the CSR Regulations. It shall be at the discretion of the Company to undertake, modify, implement and/or cancel CSR projects, programs and activities from time to time as it deems fit.

D. FOCUS AREAS:

Without prejudice to the generality of the aforesaid, the Company may (either independently or in collaboration with other entities) or to make contribution to one or more implementing agencies which are undertaking any of the following activities under the ambit of CSR:

- (i) **Education:** Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly and the differently abled, by: (i) providing monetary contributions to academic institutions for establishing endowment funds and chairs; (ii) providing, food,

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vehicles, technology products and other facilities with the objective of assisting students in their studies and also contribute to the NGO's/implementing agencies in various manner.

- (ii) **Health Care Activities:** Providing health care for visually impaired and physically challenged, creating awareness programmes, setting up of toilets in villages, helping anganwadies and facilitating them with basic amenities and setting up of mobile health vans for rural Karnataka.
- (iii) **Gender Equality and Empowerment of Women:** Setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens and promote measures for reducing inequalities faced by socially and economically backward groups.
- (iv) **Environmental sustainability:** Ensuring environmental sustainability, ecological balance, promotion of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintenance of quality of soil, air and water.
- (v) **Rural Digitalization Projects:** Setting up of Wi-Fi Zones for the local community in and around several villages in Karnataka by supporting Digital India Campaign of the Government of India.
- (vi) **Others:** Any other projects, programs and activities falling within the permissible activities prescribed under the CSR Regulations as amended from time to time.

E. MODE OF CARRYING OUT CSR ACTIVITIES:

The Company may carry out the CSR activities either on its own, or through implementing agencies or through one or more of the modes in such manner as it deems fit. The Company may also collaborate with other companies for undertaking projects, programs and activities

in such manner as it deems fit and as approved by the Xiaomi Technology India CSR Committee.

In the event the Company contributes money to the corpus of a trust/society/company, the Xiaomi Technology India CSR Committee will ensure that:

- (i) the trust/society/company has been created/incorporated exclusively for undertaking CSR Activities or such corpus of such trust/society/company is created exclusively for a purpose relating to a subject covered under CSR Regulations; and
- (ii) such company or trust or society shall have an established track record of at least 3 (Three) years in undertaking similar programs or projects and have CSR Registration No. allotted by the Ministry of Corporate Affairs.

F. COMPOSITION AND RESPONSIBILITIES OF XIAOMI TECHNOLOGY INDIA CSR COMMITTEE:

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(i) **COMPOSITION:**

The Xiaomi Technology India CSR Committee shall consist of minimum 2 (Two) or more directors as may be decided by the Board from time to time. The Board may change the composition of the Xiaomi Technology India CSR Committee from time to time in such manner as it thinks fit and as required under the CSR Regulations. The present Xiaomi Technology India CSR Committee consists of the following members:

Name	Title	Role in the Xiaomi Technology India CSR Committee
Mr. Sameer BS Rao	Director	Chairman of the Committee
Mr. Muralikrishnan B	Director	Member of the Committee

(ii) **COMMITTEE MEETINGS:**

The CSR Committee shall meet as often as its members deem necessary to perform the duties and responsibilities as per the CSR policy.

(iii) **OBJECTIVES OF THE COMMITTEE:**

1. To develop a long term vision and strategy for Xiaomi CSR activities;
2. To establish process mechanism for the implementation and monitoring the CSR activities of Xiaomi, in accordance with the CSR Regulations;
3. To strive for economic development that positively impacts the society at large with a minimal resource foot print;
4. Xiaomi shall promote projects that are:
 - a. Sustainable and create a long term change;
 - b. Have specific and measurable goals in alignment with GESL philosophy;
 - c. Address the most deserving cause or beneficiaries.
5. To establish process and mechanism for the implementation and monitoring of the CSR activities of Xiaomi.

(iv) **FUNCTIONS & RESPONSIBILITIES OF COMMITTEE:**

To achieve the above objectives, the Xiaomi Technology India CSR Committee will have, *inter alia*, the following roles, powers and responsibilities:

- Formulate and recommend to the Board, the CSR projects, programs and activities to be undertaken by Xiaomi in areas or subject, specified in Schedule VII to the Act and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan, in compliance with the CSR Regulations;
- Recommend the amount of expenditure to be incurred on the CSR activities by way of formulating and recommending to the Board, an annual action plan in pursuance of CSR Policy of the company

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including the following:

- i. the list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII to the Act;
 - ii. the manner of execution of such projects or programs as specified in CSR Rules;
 - iii. the modalities of utilisation of funds and implementation schedules for the projects or programs;
 - iv. monitoring and reporting mechanism for the projects or programs;
 - v. details of need and impact assessment, if any, for the projects undertaken by the company;
- Undertake all necessary steps to implement the CSR activities;
 - Carry out all such acts, deeds, matters and things as may be required in connection with aforesaid matters and generally for any matter connected with the CSR policy of the Company (including without limitation Schedule I hereto);
 - To perform such functions as may be entrusted by the Board from time to time; and
 - Prepare Annual report on CSR activities undertaken by Xiaomi and submit such report to the Board.

G. DECISION MAKING BY THE XIAOMI TECHNOLOGY INDIA CSR COMMITTEE:

- (i) The Committee shall at all times act in a manner that is consistent with the provisions contained in this CSR Policy and the CSR Regulations.
- (ii) The Committee shall endeavor to arrive at all decisions via consensus of all members. However, in the event the Xiaomi Technology India CSR Committee is unable to arrive at a consensus, the decision of the Chairman of the Xiaomi Technology India CSR Committee shall be final.
- (iii) All decisions of the Committee shall be ratified by the Board.

H. RESPONSIBILITY OF THE BOARD:

- (i) Approve the CSR Policy and the CSR Expenditure after taking into consideration the recommendations made by the CSR committee;
- (ii) Ensure the CSR spending every financial year of at least 2% of average net profits made during immediately preceding 3 financial years, in pursuance with the Policy;
- (iii) Ensure that CSR activities included in the CSR Policy are undertaken by the Company and that such activities are related to the activities specified in Schedule VII of the Act;
- (iv) Ensure disclosure of CSR in the Company's website, if any as required under the Act and CSR Rules;
- (v) Ensure that Board's Report shall include:
 - a. Contents of the CSR Policy and Composition of the CSR committee;
 - b. An annual report on the CSR in the prescribed format as notified by the Ministry from time to time;

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- c. Reason for failure, if any to spend required amount on CSR activities;
- (vi) Ensure that Company shall undertake the CSR activities through itself or through implementing agencies as per this policy.
- (vii) Ensure:
- i. That the funds are utilized for approved purpose and shall be certified by Chief Financial Officer (CFO) or any person responsible for financial management of the Company;
 - ii. To monitor ongoing CSR projects and modify the same as required;
 - iii. To approve annual action plan;
 - iv. To monitor administrative expenses/overheads and restrict the same to 5% of total CSR spend of the Company for the financial year;
 - v. In case of excess spend in any given year, set-off the amount in the succeeding years as per the Regulation;
 - vi. To undertake Impact Assessment if average CSR obligation of ten crore rupees or more in the three immediately preceding financial years through an Independent Agency for projects of 1 crore or more which have been completed not less than 1 year before undertaking the impact study;

I. CSR SPENDING:

- (i) The Company may, in every financial year, spend such amounts on its CSR activities as the Xiaomi Technology India CSR Committee may authorise from time to time subject to approval of the Board;
- (ii) Any surplus arising out of CSR projects, programs and activities undertaken by the Company shall not form part of the business profits of the Company.
- (iii) Any unspent amount or excess amount from the CSR budget in a financial year would be accounted for as per the provisions of the CSR Regulations

J. MONITORING PROCESS:

Xiaomi Technology India CSR Committee shall monitor the implementation of various programs, projects and activities in such manner as it deems fit. Xiaomi Technology India CSR Committee shall also determine the manner of submission of information, reports, files, etc. by third parties as a part of the monitoring process. Xiaomi CSR Committee shall ensure that a transparent monitoring mechanism is put in place.

In the event the Company wishes to implement the CSR activities undertaken by it through implementing agencies, a report on the progress made by such implementing agencies are to be submitted to the CSR Committee for its review. The CSR Committee shall periodically report to the Board on the progress made by the Company in implementing the CSR activities undertaken by it.

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K. REPORTING:

- (i) The Board's report shall include an annual report on CSR (containing particulars as required under the CSR Regulations), projects, programs and activities undertaken by the Company in the relevant financial year;
- (ii) The Xiaomi Technology India CSR Committee shall provide a responsibility statement on the implementation and monitoring of the CSR Policy and that it is in compliance with CSR philosophy of Xiaomi, which statement shall form part of the Board's Report;

L. EFFECTIVE DATE:

*The Policy shall be effective from 1st June 2017 after its final approval by the Board of directors and as amended from time to time.

M. AMENDMENTS:

The Policy may be reviewed and amended from time to time by the Board based on the recommendation of the CSR Committee. In the event of any inconsistency between this CSR Policy and the provisions under the Companies Act, 2013 as amended from time to time, the provisions under the Act shall prevail.

**On behalf of the Board
FOR XIAOMI TECHNOLOGY INDIA PRIVATE LIMITED**

Sd/-
(Sameer BS)
Director

***the CSR Policy was amended by the Board of Directors on 20th July 2021**

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