REAL TIME DATA SERVICES

CORPORATE SOCIAL RESPONSIBILITY (CSR)POLICY

REAL TIME DATA SERVICES PRIVATE LIMITED

INTRODUCTION

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Real Time Data Services Private Limited

Our CSR Vision is through sustainable measures, actively contribute to the Social, Economic, Cultural, Educational and Environmental Development of the community and contribute to the development of the under-privileged and thereby create value for the nation.

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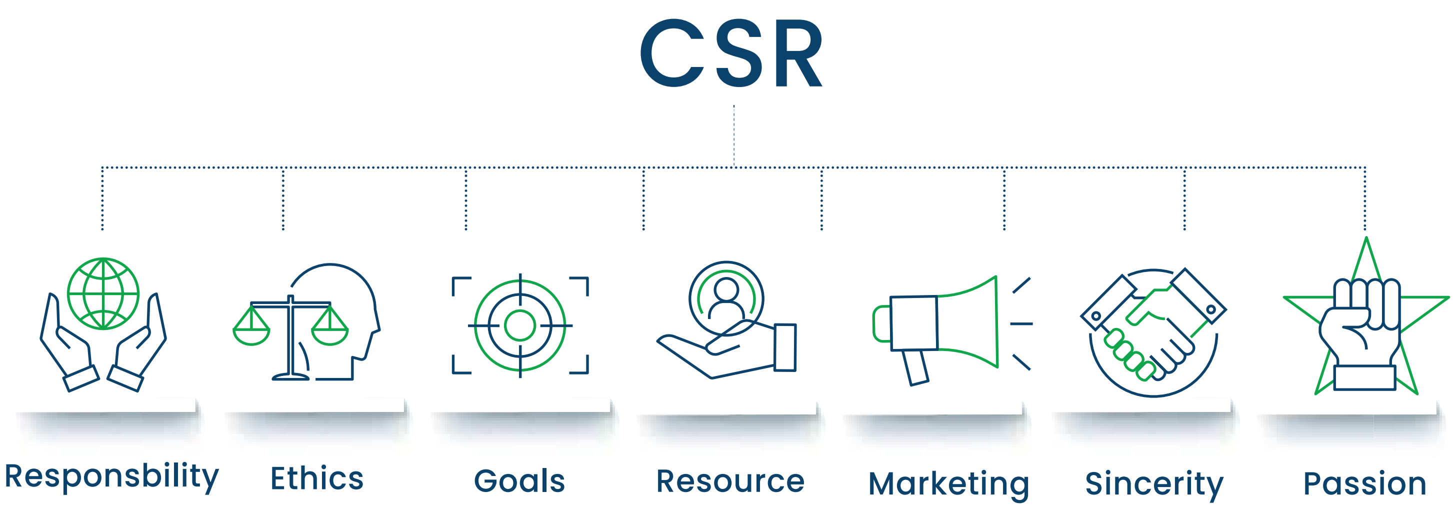
Our CSR Mission

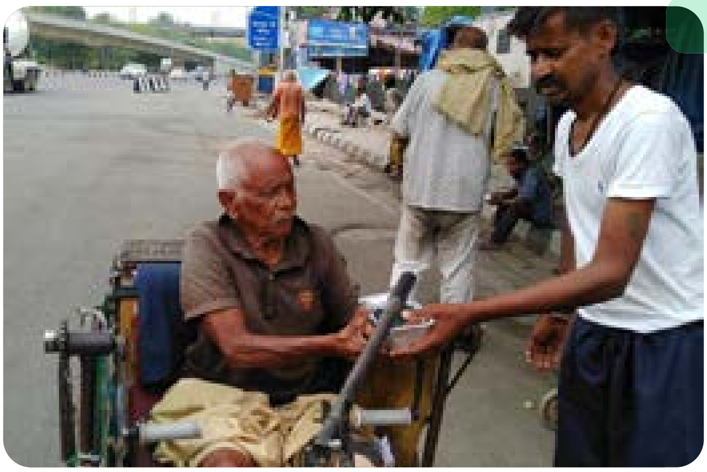
Ensuring socio-economic development of the community through different participatory and need- based initiatives in the best interest of the poor and deprived sections of the society, so as to help them to become SELF-RELIANT and build a better tomorrow for themselves. Our commitments towards Corporate Social Responsibility include but not limited to, promotion development of under privileged, providing education and training, upskilling the workforce, betterment of the society through respect for universal human rights and the environment, providing medical relief, eradicating hunger, poverty and malnutrition, promoting health care, preventive health care, acting with integrity and accountability and operating responsibly and sustainably.

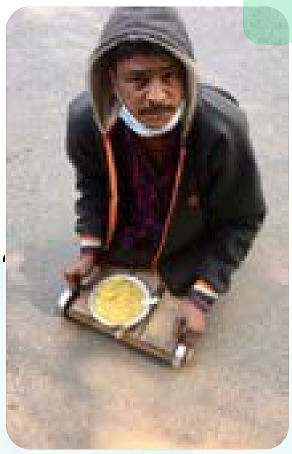


CSR In India

Corporate bodies involvement in CSR activities is not a new concept in India. Industrial majors are engaged in social development activities since long back. However, the Companies Act, 2013 has brought it under the legal purview. The concept of CSR is introduced through "Comply-or-Explain" mandate. It mandates qualifying companies to constitute Corporate Social Responsibility Committee to effectively monitor CSR activities of the Company. Further the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as "the CSR Rules") lay down the framework and modalities for carrying out CSR activities which are specified in Schedule VII of the Act.

CSR In India





Objective and Scope

Objective

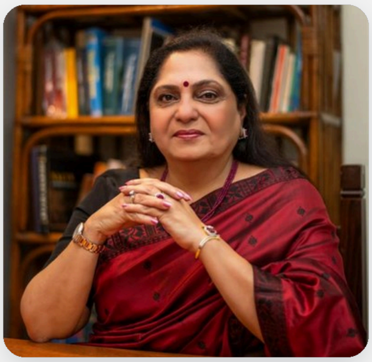
The main objective of the CSR Policy is to lay down guidelines for (hereinafter referred to as 'the Company') to make CSR as one of the key focus areas to adhere to Company's global interest in environment and society that focuses on making a positive contribution to society through effective impact and sustainable development programs. This Policy covers the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities.

Scope & Coverage

The CSR activities of the Company shall include, but not limited to any or all the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 amended from time to time including, since the 2026 amendment, subscription to zero coupon zero principal (ZCZP) instruments on a recognised Social Stock Exchange. Further, the Company will review the sectors/activities from time to time and make additions/ deletions/ clarifications to the above sectors/activities.

Corporate Social Responsibility (CSR) Committee

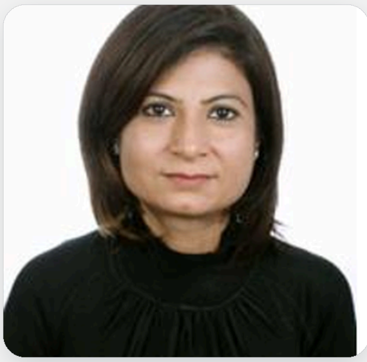
Constitution Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR shall be appointed by the Board of Directors of the Company which must consist of at least two or more Directors. Accordingly, the constitution of CSR Committee formed by Real Time Data Services Private Limited is as follows:



Dr. Sangeeta Chhabra
Chairperson

Mr. Vinay Chhabra
Member

Mr. Pranay Nagpal
Member



Ms. Anita Punwani
Member

Mr. Sachin Verma
Member

Functions and Powers of Committee

To effectively implement the objectives of the Company with respect to CSR, the Committee is vested with the following functions and powers:

- To formulate and recommend to the Board, a CSR policy which shall indicate the activities to be undertaken by the Company as per the Companies Act, 2013.
- To review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the company.
- To monitor the CSR policy of the Company from time to time.

- Recommend CSR activities as stated under Schedule VII of the Act.
- Approve to undertake CSR activities, if necessary, in collaboration with group companies/other Companies/firms/NGOs etc., and to separately report the same in line with the CSR Rules
- Recommend the CSR Budget
- Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules and ensure that entities/agencies engaged to implement CSR projects on the Company's behalf are duly registered by filing the (web-based) e-Form CSR-1 with the Registrar of Companies, as required under Rule 4 of the CSR Rules.
- Create transparent monitoring mechanism for implementation of CSR initiatives in India.
- Submit the Reports to the Board in respect of the CSR activities undertaken by the Company
- Authorize executives of the Company to attend the CSR Committee Meetings, if necessary
- Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of

Meetings of the Committee

For smooth functioning of the Committee, the members shall meet as below to discuss such matters and to take such decisions as may be necessary;

- The CSR Committee shall hold a minimum number of two meetings in a year.
- The members of the Committee may mutually agree between them regarding time and place for the said meetings.
- The quorum for the CSR Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.
- The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio visual means as may be convenient.

CSR Spend

The Companies Act, 2013 prescribes that the companies which meet the criteria specified U/s. Sec. 135 shall allocate certain portion of its annual net profits (calculated as per Sec. 198) during the three immediately preceding financial years to be spent on CSR Activities that fall under the categories specified under Schedule VII of the Act.

CSR Expenditure

Net profit for the purpose of allocation towards CSR means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee including expenditure through eligible ZCZP instruments as permitted under Rule 4A, but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

Failure to spend the CSR Money

If the Company fails to spend the required amount in a particular financial year, it is the duty of the Committee to submit a report in writing to the Board of Directors specifying the reasons for not spending the amount, which in turn shall be reported by the Board of Directors in their Annual Report pertaining to that particular Financial Year. Surplus, if any, arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.

CSR Initiatives

Pursuant to Schedule VII of the Act and the CSR Rules, the Company shall undertake CSR activities included in its Annual CSR Plan, as recommended by the CSR Committee at the beginning of each year. The Committee is authorized to approve any modification to the existing Annual CSR Plan or to propose any new program during the financial year under review.

Annual CSR Plan

The Annual CSR Plan is a yearly plan of CSR activities that would be placed before the Board of Directors of the Company based on recommendation of its CSR Committee which outlines inter alia the following aspects of CSR initiatives of the Company:

- Project Proposals
- Targeted Beneficiaries and their key needs
- Alignment with Schedule VII
- Project Goals and milestones Activities
- Timelines including expected closure dates
- CSR Budget with projections including any portion proposed to be routed through ZCZP instruments (subject to the 10% cap)
- Monitoring mechanism
- Progress reporting
- Frequency of reports Risks and mitigation strategies
- Any other information as may be required by the CSR Committee

Collaboration

It is expressly allowed under the CSR Rules that the Company may collaborate with any other Company or association formed in this regard subject to approval by CSR Committee, to implement CSR activities and the same shall form a part of the Annual CSR Plan.

Implementation through Zero Coupon Zero Principal (ZCZP) Instruments — New Route (Rule 4A)

With effect from 27 May 2026, pursuant to the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2026, the Company may, in addition to the routes described above, implement part of its CSR obligation by subscribing to a Zero Coupon Zero Principal (ZCZP) instrument issued by a Not for Profit Organisation (NPO) registered on the Social Stock Exchange (SSE) segment of a recognised stock exchange. This route is governed by the following conditions:

- The expenditure incurred through ZCZP instruments in any financial year shall not exceed 10% of the Company's total CSR expenditure for that financial year.
- CSR expenditure routed through ZCZP instruments is exempt from the independent impact assessment requirement that otherwise applies under the CSR Rules to large CSR projects.
- The requirements of Rule 4(5) and 4(6) relating to CSR-1 registration of implementing agencies, Board confirmation of fund utilisation and CFO certification do not apply to CSR implemented through this route, since the NPO is separately registered and regulated on the SSE.
- The NPO issuing the ZCZP instrument is required to complete the funded project within a period not exceeding three succeeding financial years from the date of issue of the instrument, and to transfer any unspent amount to a Schedule VII fund upon termination of listing of the instrument.
- Amounts subscribed towards ZCZP instruments shall be taken into account while computing the Company's administrative overhead limits under the CSR Rules.
- The CSR Committee shall be responsible for identifying eligible NPOs, conducting appropriate due diligence, and recommending any proposed ZCZP subscription to the Board for approval as part of the Annual CSR Plan.

Registration of Implementing Agencies (CSR-1)

Where the Company implements CSR activities through a Section 8 company, registered public trust, registered society or other eligible entity, such implementing agency must be registered with the Central Government by filing e-Form CSR-1 – "Registration of Entities for Undertaking CSR Activities", in accordance with Rule 4(2) of the CSR Rules. With effect from 14 July 2025, the erstwhile CSR-1 form has been substituted by a new web-based e-Form CSR-1 that requires enhanced documentary proof of the implementing agency's registration, exemption and approval status (including, as applicable, registration under Section 12A and approval under Section 80G of the Income-tax Act, 1961, or exemption under Section 10(23C) thereof). The Company shall ensure that no CSR funds are released to an implementing agency that has not obtained a valid Unique Registration Number under the revised CSR-1 process.

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Reporting and publication of CSR policy

As per the CSR Rules, the contents of the CSR Policy shall be included in the Directors' Report and the same shall be displayed on the Company's website, if any.

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Monitoring Mechanism

An Internal Working and Monitoring Team comprising of below mentioned employees of the Company will be set up to ensure effective implementation and monitoring of the projects approved by the CSR Committee from time to time. The team will consist of:

Mr. Amit Narula

Mr. Rajat Aggarwal

Mr. Ashwani Chaudhary

Reporting by Internal Working and Monitoring Team

The Internal Working and Monitoring Team will report / give feedback to the CSR Committee for all CSR projects undertaken. The Internal Working and Monitoring Team shall submit reports to the CSR Committee of the Company at least once in six months on the progress of the various projects approved by the Committee and entrusted to the Group for implementation and monitoring.

Policy review and future amendment

The administration of the CSR Policy of the Company and the execution of identified CSR projects, programs and activities under it shall be carried out under the control and overall supervision of an internal monitoring group formed for this purpose.

The internal monitoring group shall submit its report at least once in six months to the CSR committee formed under the Act, which shall review the CSR policy of the Company from time to time.

Further, the Board of Directors may revise/ amend this CSR Policy based on the recommendations of the CSR committee or to bring the same in line with the guidelines or amendments to the Companies Act, 2013, Schedule VII, and the Companies (Corporate Social Responsibility Policy) Rules, 2014 that may be notified after the date of this revision.

REAL TIME DATA SERVICES

THANK YOU!

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