

# India Corporate Social Responsibility Policy - Praxify

## KEY POINTS



- Focus areas for expenditure:
  - ✓ Access to high-quality healthcare,
  - ✓ STEM education,
  - ✓ Food security, and
  - ✓ Other initiatives
- Governance by the Board



## QUESTIONS ABOUT THE POLICY?

**Review** the FAQs in the policy and on the Employee Portal

**Contact** Human Resources at [askHR@athenahealth.com](mailto:askHR@athenahealth.com)



## REPORT CONCERNS TO COMPLIANCE

**Email** [Compliance@athenahealth.com](mailto:Compliance@athenahealth.com)

**Call** the anonymous 24/7 hotline at 1-800-910-6732

**File** an anonymous online report by [clicking here](#)

POLICY NUMBER: Human Resources Policy 007  
EFFECTIVE DATE: May 4, 2022  
POLICY OWNER: Gillian Perron, Senior Manager  
athenaGives

APPROVING AUTHORITY: Allyson Livingstone, Executive  
Director Diversity and Inclusion  
APPLICABILITY: Praxify Technologies India Private Limited (the  
“Company” or “Praxify”)

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# 1. Purpose

Praxify Technologies India Private Limited (the “**Company**” or “**Praxify**”) recognizes its responsibility to society. This Corporate Social Responsibility (“**CSR**”) Policy (the “**Policy**”) is intended to ensure the Company meets those responsibilities and complies with Section 135 of the Companies Act, 2013 read with the applicable Rules, Schedule VII to the Act and such other rules, regulations, circulars, and notifications in relation to CSR as may be applicable and as amended from time to time (“**Act**”). The Company’s goal is to support food security, expand access to high-quality healthcare for all now, and support STEM education to develop providers and technologists who will provide access to high-quality healthcare for all tomorrow.

## 2. Focus Areas

2.1 All initiatives pursuant to this Policy must be designed to improve the lives of the beneficiaries. Initiatives should also be replicable, scalable, and sustainable long-term. Initiatives may be designed to support:

- **Access to high-quality healthcare:** The Company may invest in opportunities to improve access to high-quality healthcare.
- **STEM education:** The Company may invest in opportunities designed to support STEM education to develop providers and technologists who will provide access to high-quality healthcare for all tomorrow.
- **Food security:** The Company may invest in opportunities related to food security.
- **Other initiatives:** Company may also invest in any other need-based initiatives that comply with the Act provided such initiative(s) are approved in advance by the Company’s Board of Directors (the “**Board**”).

## 3. Governance: The Board

### 3.1 Roles and Responsibilities:

The Board is responsible for:

- Ensuring to spend at least 2% of the Company’s average net profits for the preceding three-years period per financial year on CSR activities. If such spend threshold is not met in any financial year, the Board will ensure disclosure of the reasons for the same in the Board’s report.
- Identifying appropriate CSR activities and proposing a budget for those activities and ensuring effective implementation of CSR activities in compliance with the requirements of the Act.
- Coordinating the implementation or execution of any CSR activities.
- Coordinating with agencies or third parties used by the Company to execute CSR activities.

- Reviewing the effectiveness of any CSR activities or third parties used in connection with the same.
- Forming and delegating authority to sub-committees or employees as the Board determines is necessary.
- Reviewing and recommending any changes to this Policy as and when deemed necessary.
- Obtaining guidance from internal or external advisors as needed to ensure compliance with the Act and this Policy.
- Ensuring that the Company complies with its obligations under the Act and this Policy.

3.2 This Policy must be placed the Company's website, if any.

3.3 The Board must decide on the location for all CSR activities. CSR should generally be focused on local areas and areas around it where the Company operates within India, but the Company may also engage in activities in other parts of India where societal needs are high or in special situations (e.g., natural disaster).

## 4. CSR funds and expenditures

4.1 The Board must ensure that at least 2% of the Company's average net profits for the preceding three-years period are spent per financial year on CSR activities. If the foregoing amounts are not spent in any financial year, the reason(s) for not doing so must be disclosed in the Board's report.

4.2 Any profits generated from CSR activities must not be considered part of the Company's profits.

4.3 CSR expenditures include all direct and indirect costs incurred by the Company on CSR activities, including any third-party costs included by the Company.

4.4 The amount of administrative overhead, either in the form of internal or agency costs, must not exceed 5% of the Company's total CSR expenditure for a given year.

## 5. Implementation modalities

5.1 Subject to the provisions of the Act, CSR activities may be undertaken by the Company:

- through 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 otherwise as may be permitted under applicable law and having obtained a unique CSR Registration Number;
- through a company established under Section 8 of the Act or a registered trust or a registered society, other than those specified in clause (i) above, that have

an established track record of three years in undertaking similar projects or programs; or

- (iii) the Company may also collaborate with other companies on CSR activities, but the Company must be able to report separately on such activities.

## 6. Monitoring and Review

The Board must establish and maintain a monitoring and review mechanism for CSR activities. This may include periodic internal audits or reports, or other appropriate mechanisms as determined by the Board. This must also include using studies or other appropriate research to assess the needs and priorities of the community when seeking to identify CSR activities.

## 7. Reporting & Disclosure

All CSR activities must be properly documented and auditable on a project-by-project basis.

## 8. Revisions

The Board may revise this Policy at any time as required by law.

## 9. Approval History

Date	Approved By	Signature
8/28/2020	Frances Lawler	<b>/s/ Frances Lawler</b>
9/20/2021	Frances Lawler	<b>/s/ Frances Lawler</b>
5/4/2022	Allyson Livingstone	<b>/s/ Allyson Livingstone</b>