

# Business Responsibility Report

[Pursuant to Regulation 34(2)(f) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

The Company endeavours to conduct its business responsibly, mindful of its social accountability, respecting applicable laws and with regard for human dignity. Through this Business Responsibility Report ('BRR'), your Company seeks to communicate its obligations and performance to all its stakeholders.

As a responsible corporate citizen, your Company continues to actively engage with all its stakeholders to drive their growth for all. This report conforms to the Business Responsibility Reporting requirement of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations').

## SECTION A: GENERAL INFORMATION ABOUT THE COMPANY

- Corporate Identification Number (CIN) of the Company:** L65910TN1988PLC015757
- Name of the Company:** Computer Age Management Services Limited
- Registered Office:** New No.10, Old No.178, M.G.R. Salai, Nungambakkam, Chennai-600034, Tamil Nadu, India
- Website:** [www.camsonline.com](http://www.camsonline.com)
- E-mail id:** [secretarial@camsonline.com](mailto:secretarial@camsonline.com)
- FY reported:** From April 01, 2020 to March 31, 2021
- Product or service category (ITC 4 digit) code:** 9983 Financial Business Processes Management Services
- List three key products/services that the Company manufactures/provides (as in balance sheet)**  
We are a financial infrastructure and services provider operating in seven business verticals: Mutual Funds Services Business, Electronic Payment Collection Services Business, Alternative Investment Fund Services Business and Banking.
- Total number of locations where business activity is undertaken by the Company:**
  - Number of international locations (provide details of major 5): Nil

- Number of national locations: The Company has a PAN India Network with 272 locations all over India.

## 10. Markets served by the Company

The Company's operations are limited to India. The Company is the Country's largest registrar and transfer agent of mutual funds with an aggregate market share of approximately 69% based on mutual fund average assets under management ("AAUM") managed by our clients as on March 31, 2021, according to the data as published by AMFI.

## SECTION B: FINANCIAL DETAILS OF THE COMPANY

- Paid up Capital: Rs. 48,79,10,380 as on March 31, 2021
- Total Turnover: Rs. 67,375.26 lakhs for the year ended March 31, 2021
- Total profit after taxes: During the year, the Company recorded a net profit of Rs. 21,897.28 lakhs for the year ended March 31, 2021
- Total Spending on Corporate Social Responsibility: Rs. 421.36 lakhs for the year ended March 31, 2021 (1.92% of PAT)
- List of activities in which expenditure in 4 above has been incurred:

The areas in which the above expenditure was incurred inter-alia included Education, Health & Senior Citizen care Infrastructure.

## SECTION C: OTHER DETAILS

- Does the Company have any Subsidiary Company/ Companies?**  
The Company has 6 direct and indirect subsidiaries in India and overseas as on March 31, 2021.
- Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s).**  
Not Applicable.
- Participation and percentage of participation of other entity/entities (e.g. suppliers and**

distributors, among others) that the Company does business with, in the BR initiatives of the Company. If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]

No.

## 2. Principle-wise (as per NVGs) BR Policy/ Policies

The National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (NVG-SEE) released by the Ministry of Corporate Affairs has adopted nine areas of Business Responsibility. These are as follows:

- P1 - Businesses should conduct and govern themselves with Ethics, Transparency and Accountability.
- P2 - Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle.
- P3 - Businesses should promote the well-being of all employees.
- P4 - Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.
- P5 - Businesses should respect and promote human rights.
- P6 - Businesses should respect, protect, and make efforts to restore the environment.
- P7 - Businesses when engaged in influencing public and regulatory policy, should do so in a responsible manner.
- P8 - Businesses should support inclusive growth and equitable development.
- P9 - Businesses should engage with and provide value to their customers and consumers in a responsible manner.

## SECTION D: BR INFORMATION

### 1. Details of Director/Directors responsible for BR

#### a) Details of the Director responsible for the implementation of the BR policy/policies

DIN Number: 08268864

Name: Anuj Kumar

Designation: Wholtime Director

#### b) Details of the BR head

S. No.	Particulars	Details
1.	DIN Number	08268864
2.	Name	Anuj Kumar
3.	Designation	Wholtime Director
4.	Telephone number	044-61092992
5.	Email ID	anuj.kumar@camsonline.com

#### a) Details of compliance (Reply in Y/N)

SN	Questions	Principles								
		P1	P2	P3	P4	P5	P6	P7	P8	P9
1	Do you have a policy/ policies for each principle stated in the NVGs?	The Company has various policies in place which have been approved either by the Board or by other appropriate authority in the Management. These policies capture the essence of the principles of the NVGs. These policies have also been devised to ensure adherence to all applicable laws and Regulations while considering best practices in the industry.								
2	Has the policy being formulated in consultation with the relevant stakeholders?	The policies are framed taking into consideration the interest of the stakeholders. Our policies adhere to the guidelines/ Rules issued by the Ministry of Corporate Affairs & other Regulators. The policies are shared with the stakeholders if the same is mandated.								
3	Does the policy conform to any national/ international standards? If yes, specify?	The policies conform to the regulatory requirements where such Regulations exist. No specific national or international standards are applicable for the policies framed. The policies relating to Information Security Management system adhere to the standards of ISO/IEC 27001:2013. The policies relating to Quality Management adhere to the standards of ISO 9001:2015.								
4	Has the policy being approved by the Board? If yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?	The policies wherever mandated to be approved by the Board have been under the applicable laws/Regulations are duly approved by the Board. Other policies have been approved by the appropriate authorities.								
5	Does the company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?	The Board, its committees and the senior management team reviews the implementation of policies on a regular basis.								
6	Indicate the link for the policy to be viewed online?	The policies which require hosting in the website have been hosted in the Company's website - <a href="http://www.camsonline.com">www.camsonline.com</a>								

SN	Questions	Principles								
		P1	P2	P3	P4	P5	P6	P7	P8	P9
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Yes. To enable dissemination the policies are hosted in the intranet or in the website of the company.								
8	Does the company have in-house structure to implement the policy/ policies?	Yes. The policies are reviewed and revised at specified periodicity by the senior Management or the approving authority.								
9	Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/ policies?	The Company has a whistle blower mechanism which can be used by the stakeholders for highlighting their grievances. The Company also has specific mail id for receiving the complaints from the shareholders.								
10	Has the company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	The Company carries out external auditors from time to time in accordance with the regulatory and statutory requirement. However, specific independent audit on the NVG principles has not yet been carried out.								

Link for Policies

Code of Conduct	<a href="https://www.camsonline.com/about-cams/shareholder-relations/policies">https://www.camsonline.com/about-cams/shareholder-relations/policies</a>
Corporate Social Responsibility	<a href="https://www.camsonline.com/about-cams/shareholder-relations/policies">https://www.camsonline.com/about-cams/shareholder-relations/policies</a>
Vigil Mechanism Policy / Whistle Blower Policy	<a href="https://www.camsonline.com/about-cams/shareholder-relations/policies">https://www.camsonline.com/about-cams/shareholder-relations/policies</a>

b) If answer to S. No. 1 against any principle, is 'No', please explain why: (Tick up to 2 options)

Not Applicable

**3. Governance related to BR**

- Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year:

The Board of Directors, its Committees meet periodically for assessing the performance of the company on various aspects which also includes BR Performance to the extent applicable. In addition to the above CEO meets the stakeholders on a periodical basis for a similar review. The meetings happen on a quarterly basis.

- Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?

This is the first Business Responsibility (BR) Report published by the Company. The BR Report forms part of Annual Report of the Company and may also be accessed on the Company's website: [www.camsonline.com](http://www.camsonline.com)

**SECTION E - PRINCIPLE-WISE PERFORMANCE**

**Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability**

**1. Does the policy relating to ethics, bribery and corruption cover only the company? Yes/ No. Does it extend to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others?**

The Company has a defined Code of Conduct. This Code covers the Company and is applicable to all Directors, Senior Management including all functional heads, management personnel and employees. The Company also has a policy on Anti-Corruption and Bribery. These documents serve as a roadmap to all Directors and employees of the Company across all levels and grades for conducting business in accordance with the highest standards of business ethics and complying with applicable laws, Rules and Regulations. The Company has adequate control measures in place to address the issues in the context of these policies. All the vendors are required to execute a vendor code of conduct which covers various aspects relating to ethics bribery and corruption.

2. **How many stakeholder complaints have been received in the past FY and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.**

The Company is a Service provider for Mutual Funds and as part of its services receives complaints from stakeholders which is addressed by it on a regular basis. The details of the complaint are also filed with the regulator as part of periodical filing. During the year 2020-21, all the complaints have been satisfactorily resolved.

The Company has appointed Link Intime India Private Limited as its Registrar and Transfer Agent in relation to the activities relating to the services relating to its shareholders. The complaints received from the RTA and the company are resolved from time to time. During the year 20-21 total of 1,027 complaints were received which have been resolved fully and most of them pertain to IPO refunds. For this purpose, we have not included the complaints which are made to the AMCs and repeated complaints.

**Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle**

The Main activity of the company is providing services to Mutual Funds and is not engaged in designing of any products. As part of its CSR initiatives, it provides awareness to the investors about various investment products and safe investment practices. As part of its activities the company provides various digital platforms to carry out investment related transactions. These platforms are designed taking into account the rights of the investors.

1. **List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.**

The Company is not producing any products. It focusses on providing the services on a digital platform and in a paperless mode which significantly reduces the use of paper which is environmental friendly. The online facilities to the stakeholders amidst pandemic was considered as an activity addressing social concerns.

2. **For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product(optional):**

- a. **Reduction during sourcing/production/distribution achieved since the previous year throughout the value chain?**

Not applicable

- b. **Reduction during usage by consumers (energy, water) has been achieved since the previous year?**

Not applicable

3. **Does the company have procedures in place for sustainable sourcing (including transportation)? If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.**

Not applicable since the company is not producing any product and is only a service provider.

4. **Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work? If yes, what steps have been taken to improve their capacity and capability of local and small vendors?**

Procurement of goods not applicable in view of the nature of business carried out. However, the company provides opportunity for small start-ups to participate in its operations through off site locations situated across the country.

5. **Does the company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.**

Not applicable

**Principle 3: Businesses should promote the wellbeing of all employees**

1. **Please indicate the Total number of employees:** 5,850 employees including the employees hired on temporary/contractual/casual basis
2. **Please indicate the Total number of employees hired on temporary/contractual/casual basis:** 1,956 employees hired on temporary/contractual/casual basis
3. **Please indicate the Number of permanent women employees:** 1,278 employees are permanent women employees
4. **Please indicate the Number of permanent employees with disabilities:** 16 employees are permanent employees with disabilities
5. **Do you have an employee association that is recognized by management:** No

6. **What percentage of your permanent employees is members of this recognized employee association?**  
Not Applicable

7. **Please indicate the Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last FY and pending, as on the end of the FY.**

There were no complaints during the year/outstanding at the end of the financial year in respect of Child labour/ forced labour/ involuntary labour, Sexual harassment and Discriminatory employment.

8. **What percentage of your undermentioned employees were given safety & skill up-gradation training in the last year?**

Training is provided for all employees based on the nature of their activities and it is a continuous activity. The training may be either virtual or classroom based.

**Principle 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized**

1. **Has the company mapped its internal and external stakeholders:** Yes

2. **Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders.** Yes

3. **Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders? If so, provide details thereof, in about 50 words or so.**

The beneficiaries of its CSR activities are considered as an external stakeholder. Its activities are focussed towards the following segments of the society.

- Children deprived of education due to lower income
- Senior Citizens who do not have children/relatives looking for support
- Community in rural and sub-urban areas looking for Medical support
- Women self-help groups looking for entrepreneurial skills

**Principle 5: Businesses should respect and promote Human Rights**

1. **Does the policy of the company on human rights cover only the company or extend to the Group/ Joint Ventures/ Suppliers/ Contractors/ NGOs/ Others?**

The Policy covers the Company and its service providers.

2. **How many stakeholder complaints have been received in the past FY and what percent was satisfactorily resolved by the management?**

There were no complaints during the year/outstanding at the end of the financial year.

**Principle 6: Business should respect, protect, and make efforts to restore the environment**

1. **Does the policy related to Principle 6 cover only the company or extends to the Group/Joint Ventures/ Suppliers/Contractors/NGOs/others?**

The Company is engaged in Information Technology Enabled Services and is not engaged in manufacturing activities. Hence the relevance of this principle is negligible. However, the company understands its responsibility to operate in an environmentally sustainable and by developing, promoting and implementing eco-friendly services.

2. **Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give hyperlink for webpage etc.**

The Company has been focussing on providing digital services in the areas in which it operates. The green initiatives taken by it has significantly reduced the printing of statements and other communications. The volume of paper transactions has come down to ~22% as compared to ~65% in the previous three financial years. All its energy consuming equipments have been replaced with energy efficient devices

3. **Does the company identify and assess potential environmental risks? Y/N**

This has no relevance considering the nature of the company's business.

4. **Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?**

The Company is not a manufacturing organisation and does not generate waste or products or by products generally associated with manufacturing.

5. **Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.**

The offices of the company are well optimised for conservation of energy. All equipments including Lights and Air conditioners are ensured for energy efficiency and minimal wastage.

6. **Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the FY being reported?**

Not applicable

7. **Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of FY.**

Nil

**Principle 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner**

1. **Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with:**

The Company is a member of various trade bodies including Madras Management Association, National Association of Software and Services Companies (NASSCOM), Madras Chamber of Commerce and Industry, Registrars Association of India (RAIN).

2. **Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas (drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)**

The Company collaborates with the above entities and regulators as applicable to bring in more standardisation, simplification of processes, reduction in the delivery timelines etc. which will be improvement for its customers and the public.

**Principle 8: Businesses should support inclusive growth and equitable development**

1. **Does the company have specified programmes/ initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof.**

The CSR Policy and activities of the company is focussed on ensuring inclusive growth and equitable development.

2. **Are the programmes/projects undertaken through in-house team/ own foundation/ external NGO/ government structures/ any other organization?**

The activities are carried out predominantly through external NGOs specialised in the specific area of activity.

3. **Have you done any impact assessment of your initiative?**

The Company carried out an impact assessment through an external agency on a voluntary basis which is reviewed by the CSR committee.

4. **What is your company's direct contribution to community development projects- Amount in Rs. and the details of the projects undertaken?**

The amount contributed for the community development projects is Rs. 4.21 crores.

Details of the project undertaken has been provided as part of the Boards report forming part of this annual Report.

5. **Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.**

The Company takes effective steps for ensuring that the community development initiatives are successfully adopted by the community. The following steps forms part of all the CSR projects for achieving the above.

- Projects are chosen after considering its relevance to the specific community.
- identifies CSR partners have established local connect with the community to meet their requirement.

- Periodical visits and interventions are made to ensure the adaptation of the project by the community.

An exhaustive third party validation of the adoption and the impact is carried out.

**Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner**

**1. What percentage of customer complaints/consumer cases are pending as on the end of FY?**

The Company provides services to the investors of various mutual funds. In exceptional cases disputes are raised before the courts/consumer forums in respect of family disputes in which the company is included as a responding party. Details of the complaints and the outstanding cases are as on March 31, 2021 is as follows:

Year	Outstanding Complaints	Outstanding consumer cases
2020-21	0	6

**2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks (additional information)**

Not applicable. The services provided are detailed in the website in a separate Section exclusively maintained for the customers/investors.

**3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of FY. If so, provide details thereof, in about 50 words or so.**

No such cases have been filed.

**4. Did your company carry out any consumer survey/ consumer satisfaction trends?**

Yes. As mandated by the Regulator a customer satisfaction survey is carried out and the details are displayed in the website of the company.

## DIVIDEND DISTRIBUTION POLICY

### OBJECTIVE:

The objective of this policy is to lay down the criteria to be considered by the board of directors of the Company before recommending dividend to its shareholders for a financial year. Dividend for the purpose of this Policy includes Interim Dividend.

### CRITERIA TO BE CONSIDERED BEFORE RECOMMENDING DIVIDEND:

The board of the Company shall consider the following factors before recommending dividend:

#### Statutory and regulatory compliance:

The Company shall declare dividend only after ensuring compliance with the applicable regulatory requirements of the Company. Policy recognizes that the Business of the Company is regulated, and the Company shall at all times comply with extant regulations and other applicable Law in conducting its Business and this Policy shall not constrain the Company in any manner in adhering to any regulatory requirements or framework prescribed by Law.

#### Financial criteria:

- For dividend (except for interim dividend), out of profits of the Company for a financial year in the manner as provided under Section 123(1) of the Companies Act, 2013
- For any interim dividend, out of profits in the manner as provided under Section 123(3) of the Companies Act, 2013

#### Dividend pay-out:

The Company shall endeavour to, subject to applicable law, declare and distribute a dividend (including dividend distribution and other taxes, cess, levies, if any relating to the dividend) of 65% (sixty five percent) of the consolidated profit, net of tax, of the Company for the relevant financial year subject to availability of cash and equivalents and after taking into consideration capital expenditure and working capital requirements. (“**Target Pay-out**”)

It is hereby clarified that any declaration of dividend for this purpose shall be calculated inclusive of dividend distribution tax and other taxes, cess, levies, if any related to the dividend, for such relevant financial year.

Currently, the Company does not have any other class of shares (including shares with differential voting rights) other than equity shares. In the absence of any other class of shares and/or shares with differential voting rights, the entire distributable profit for the purpose of declaration of dividend is considered for the equity shareholders.

#### Amendments / modifications:

To the extent any change/amendment is required in terms of any applicable law, the law would prevail over this Dividend Distribution Policy and the provisions in this Dividend Distribution Policy would be modified in due course to make it consistent with law. Such amended policy shall be placed before the Board for approval.