

**NetApp India Marketing & Services  
Private Limited (NAMS Pvt. Ltd)**

**Corporate Social Responsibility  
Policy Document**

March, 2016

**NetApp India Marketing & Services Pvt. Ltd. (NAMS Pvt. Ltd.)**

**Corporate Social Responsibility Policy**

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# **NetApp India Marketing & Services Private Limited (NAMS Pvt. Ltd.)**

## **Corporate Social Responsibility Policy**

### **1. Preamble**

NetApp is committed to making a positive impact in the communities where our employees live and work around the globe. At NetApp, social responsibility and giving back isn't just an optional activity that we take pride in; giving back to the community is a large part of our culture that sets us apart and makes our NetApp community a family. Our company's core values and beliefs stress on the idea of '*going beyond*'. We encourage our employees to actively engage in community service. NetApp as a Company focuses on certain causes but we welcome and encourage employees to do individual volunteering beyond these focus areas. Based on the need and opportunity, NetApp may also explore other forms of engagements with the community.

### **2. Purpose of the policy**

The purpose of the Corporate Social Responsibility Policy is to delineate our responsibility as a socially and environmentally responsible corporate citizen in India. It will serve as a guiding document in identifying, executing and monitoring CSR activities in NetApp's branch/ subsidiary NetApp India Marketing & Services Pvt. Ltd (NAMS Pvt. Ltd) henceforth mentioned as the Company. The policy is drafted in keeping with the spirit of the Corporate Social Responsibility Policy Rules, 2014 as per Section 135 and sub-sections 1 & 2 of Section 469 of the India Companies Act, 2013.

### **3. Policy Statement**

The Company is committed to sustainable business development and responsible corporate citizenship. These initiatives are independent of the normal course of business of NetApp. We shall ensure that our CSR operations comply with Corporate Social Responsibility Policy Rules, 2014, as per Section 135 and sub-sections 1 & 2 of Section 469 of the India Companies Act, 2013. The Board of Directors of the company, after taking into account the recommendations of CSR Committee, has approved this CSR policy of NAMS Pvt. Ltd.

#### **4. Normal Course of business**

NetApp is a leading global provider of innovative storage and data management software, systems and services. NetApp is headquartered in Sunnyvale, California and is the creator of Data ONTAP® - worlds #1 branded storage operating system. Throughout the world, leading organizations count on NetApp for software, systems, and services to manage and store their data. We help enterprises and service providers envision, deploy, and evolve their IT environments. Customers also benefit from our open collaboration with other technology leaders to create the specific solutions they need. NetApp addresses the storage needs of its customers through on premise dedicated storage as well as hybrid cloud solutions. NetApp Data Fabric allows customers to operationalize cloud with a consistent way to manage, secure, and protect their data in all their clouds.

Our team is passionate about customer success. Our company culture and work environment support that dedication. Together with our global network of partners, we are united in one goal: to help our customers achieve the outcomes that matter most to them. NetApp has been ranked #4 on the Great Place to Work Institute's "World's Best Multinational Workplaces" list.

#### **5. Global Giving goals of NAMS Pvt. Ltd.**

At NetApp a key component of Corporate Social Responsibility is our Global Giving program. The Company encourages employees to participate in community activities that are aligned with the corporate initiatives of NetApp, Inc., while remaining responsive to the needs of the local Indian community. The Volunteer Time Off (VTO) program enables all full-time employees to take up to five business days (40 hours) of time off with pay per calendar year to volunteer for any community activity/ cause/ charity of their choice. NetApp as a Company focuses on certain causes but we welcome and encourage employees to do individual volunteering beyond these focus areas. VTO is one of the major CSR activities at NetApp.

The following are areas of focus of CSR activities:

- Promoting primary education
- Vocational skills training
- Eradication of hunger & poverty
- Helping differently abled & destitute

Based on the need and opportunity, other forms of engagements with the community may also be explored.

## **6. Global Giving Projects**

The Company is highly supportive of involving its employees in Global Giving by engaging them in community activities/ causes/ charities of their choice through the VTO program. In order to ensure that the Global Giving activities are performed in manner consistent with our Global Giving strategy, the Company will focus its efforts on pre- determined causes and areas of intervention as outlined above. The CSR Committee will consider and approve Global Giving projects to be undertaken every year relevant to India. The details of the projects will be outlined in the Annexure to Director's report on CSR activities, as per the guidelines provided in the Corporate Social Responsibility Policy Rules, 2014.

## **7. Governance structure**

The Company has constituted a robust and transparent governing mechanism to oversee the implementation of the CSR activities, in compliance with the requirements of Section 135 of the Companies Act, 2013. The Company's CSR activities will be driven by the CSR team known as the Global Giving team, under the guidance of the CSR Committee.

### **7.1. CSR Committee**

To incorporate CSR projects in a corporate structure, a CSR Committee has been constituted as per the guidelines provided in Section 135 of the Companies Act, 2013. The CSR Committee is headed by Anil Valluri and consists of members of the Board of Directors from NAMS Pvt. Ltd. The CSR Committee will meet at least four times every year to review the progress of CSR activities.

The members of the Committee are:

- Anil Valluri, President Sales India and SAARC, India Regional Sales
- Deepak Naragund, Finance Manager - India, Int'l Field Ops Finance
- Krithika Radhakrishnan, Director Finance - APAC Channels & ASEAN Region, Int'l Field Ops Finance
- Parag Amalnerkar, India Marketing Manager
- Vicky Koutsis, Director, Employee Engagement & Great Place to Work, HR Org Effectiveness & Global Giving

### **Responsibilities of the CSR Committee**

- Formulate the Company's CSR strategy, policy and goals
- Allocate and monitor budget & expenditure for CSR activities
- Monitor execution of CSR activities as per the policy
- Ensure CSR reporting and communication as per Corporate Social Responsibility Rules, 2014 of the Companies Act 2013
- Ensure legal and regulatory compliance as per Corporate Social Responsibility Rules, 2014 of the Companies Act, 2013

## **7.2 Global Giving Team**

The Company's CSR activities will be driven by NetApp Global Giving team working together with the CSR Committee.

### **Responsibilities of Global Giving Team**

- Evaluate projects and partners as per the developed framework
- Involve and support employees to volunteer for Global Giving activities
- Implement projects based on set targets and action plans
- Closely monitor Global Giving activities to ensure set targets are achieved
- Disburse and track funds for Global Giving projects
- Send quarterly progress reports to the CSR Committee

## **8. CSR Budget**

The CSR budget of the Company, in every financial year, would be allotted consistent with the guidelines prescribed under Section 198 of the Companies Act, 2013. The overall amount to be committed to CSR will be approved by the CSR Committee as per the Company's Annual Budget/ Plan.

## **9. Project selection & approval**

Various activities aligned with the focus areas of mentioned earlier under point 5 are identified with support from the NetApp's Global Giving team and as per Schedule VII as required by the India Companies Act 2013. The projects selected will be approved by the CSR Committee. Budgets for these projects will be finalized and disclosed at the beginning of every financial year.

## **10. Implementation**

The Global Giving team would assist in implementing and monitoring the CSR activities. The actual implementation of the projects will be broad based with the involvement of the Company's employees and implementation agencies like Trusts, Societies, Section 8 Companies and Government approved educational institutions. The implementation agency should typically have more than three years of experience in implementing projects in the respective area. The implementation partner will also be screened based on NetApp Inc's internal screening criteria to ascertain the entity's credibility and ability to execute a project in collaboration with our employees.

## **11. Monitoring**

The CSR Committee will ensure implementation of a robust monitoring mechanism to ensure the effective execution of the activities undertaken by NAMS Pvt. Ltd. The Global Giving team will be responsible for monitoring approved projects and disbursement of funds for projects. Monitoring mechanism would include periodic meetings, reviews, and tracking of project status on an ongoing basis based on the guidelines mentioned in the Corporate Social Responsibility Policy Rules, 2014.

## **12. Reporting**

As per the Corporate Social Responsibility Policy Rules, 2014 the Board of Directors of NAMS Pvt. Ltd. shall, after taking into account the recommendations of CSR Committee, approve the CSR Policy for the company and disclose contents of such policy in its report and the same shall be displayed on the company's website, if any, as per the particular specified in the Annexure.

## **13. Treatment of surpluses**

Surpluses arising out of the CSR activities shall not form part of the business profit of NAMS Pvt. Ltd. They will be used in the further development of the CSR initiatives and will not be added to the normal business profits of NAMS Pvt. Ltd.