

Corporate Social Responsibility Policy

Check Point Software Technologies (India) Pvt. Ltd.

Introduction

Check Point Software Technologies (India) Private Limited (the “Company” or “we”) believes in acting responsibly within our local communities. As a global cyber security provider, we aim to protect individuals and organizations while positively impacting society and the environment. Our mission is to create a secure and sustainable future for all. This Corporate Social Responsibility (“CSR”) policy outlines our commitments and initiatives.

Scope and Applicability of This Policy

In accordance with Section 135 of the Companies Act, 2013, the Companies (Corporate Social Responsibility Policy) Rules, 2014, and the related acts and rules (collectively, the “CSR Requirements”), the Board of Directors (the “Board”) of the Company has established this Corporate Social Responsibility Policy (the “CSR Policy”). This CSR Policy outlines the Company’s philosophy and responsibility, establishing the framework and mechanisms for undertaking socially and environmentally impactful initiatives for the betterment and development of the community and society at large.

CSR Policy Objectives

The objectives of this CSR Policy are to:

- Define the guiding principles for carrying out CSR activities in India.
- Outline the areas of focus for the Company’s CSR initiatives.
- Establish procedures for the implementation and monitoring of CSR projects.
- Disclose current as well as proposed CSR objectives, guiding the activities to be undertaken by the Company.
- Ensure compliance with statutory requirements related to CSR.

CSR Focus Areas and Priorities

As noted, the Company is committed to creating a positive impact through various CSR initiatives, projects, and programs, which are approved from time to time by the Board acting in its capacity as the CSR Committee of the Company, according to the following key focus areas and guided by the subjects specified in Schedule VII of the Companies Act:

- **Community Engagement and Welfare:** Supporting local programs that foster stronger and more vibrant communities including efforts aimed at the protection of national heritage, art and culture, as well as support for sporting activities in rural areas and nationally-recognized, paralympic and Olympic sports.
- **Diversity and Inclusion:** Empowering women, senior citizens, and underrepresented groups through initiatives promoting fair employment, social equity and overall wellbeing.
- **Socio-Economic Development:** Contributions to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development, relief and welfare of the Scheduled Castes, the Scheduled Tribes, or other underrepresented classes and sectors of society, including support for rural and slum area development projects.
- **Education:** Supporting schools, educational institutions and publicly-funded universities by providing learning opportunities and access to cyber security and technical education for all, with a particular emphasis on children, women, elderly, and disabled individuals from various socioeconomic and cultural backgrounds, including support for livelihood enhancement projects.
- **Environmental Sustainability and Disaster Relief:** Supporting initiatives that preserve the natural environment and promote sustainable practices, including efforts to aimed at rehabilitation following natural disasters such as provision of relief, rehabilitation and reconstruction support.
- **Arts, Culture and National Heritage:** Encouraging the celebration of national heritage in local communities and organizations, promoting artistic expression and cultural awareness.
- **Philanthropy and Health:** Assisting those in need and underserved populations by donating to hospitals and medical institutions to improve healthcare, social and wellbeing service access for all, while placing an emphasis on programs to eradicate hunger, poverty, and malnutrition, in addition to improving access to adequate sanitary services and safe drinking water.
- **Research, Development and Innovation:** Supporting local incubators and R&D projects in science, technology, cyber security, engineering and medicine with the goal of strengthening technical infrastructure and promoting local innovation and industrial growth.

All CSR projects and programs selected in the implementation of this CSR Policy shall be carried out in India only and shall not include activities undertaken in the normal course of business of the Company.

The Company may collaborate with NGOs, registered trusts, societies, or other like-minded stakeholders to leverage collective expertise and resources.

Administration of the CSR Committee

The Company's CSR initiatives in India shall be overseen by a CSR Committee appointed by the Board. The CSR Committee shall consist of at least two or more directors. The responsibilities of the CSR Committee include:

- Formulating, approving and recommending the CSR Policy to the Board according to Schedule VII of the Companies Act, 2013 and the CSR Requirements (as outlined in "CSR Focus Areas and Priorities" section above).
- Recommending collaboration with relevant companies, firms and non-governmental organizations (NGOs) in order to carry out the selected CSR activities.
- Spending the allocated amount on the CSR activities once those activities are approved by the Board's CSR Committee and in accordance with the CSR Requirements.
- Monitoring the implementation of the CSR Policy and selected projects and programs in a transparent fashion according to the outlined due diligence procedure (see the "Monitoring and Reporting" section below).
- Reporting to the Board on CSR activities on an annual basis, or more frequently, as needed, ensuring that such reporting is documented in the form of recorded meeting minutes.

Budget and Expenditure

In alignment with CSR Requirements, the Company shall endeavor to spend annually at least two percent (2%) of the average net profits before tax made by the Company during the three immediately preceding financial years on CSR projects and programs that are in line with Schedule VII, as outlined in the "CSR Focus Areas and Priorities" section above.

CSR expenditure will include all expenses incurred in implementing the approved CSR projects and programs, ensuring that administrative overhead shall not exceed five percent (5%) of the total CSR expenditure for the financial year. Any surplus arising out of the CSR activities shall not form part of the business profits of the Company and shall be utilized solely for future or forthcoming CSR activities. If, for any reason, the Company fails to spend the allocated CSR budget on activities outlined in Schedule VII during the financial year, the CSR Committee shall inform the Board of Directors accordingly and the Board will record the reasons for not spending the required amount in the annual report filed on the Company's website.

Monitoring and Reporting

Under the guidance of the CSR Committee, the Company shall implement a transparent monitoring mechanism for its CSR projects and programs. The mechanism shall include:

- Confirmation that the selected beneficiary, whether a company, firm, or NGO is either a Section 8 company according to the Companies Act, 2013, a registered public trust, or a registered society.
- Verification that the company, firm, or NGO is registered under the required accounting provisions, such as Section 12A and 80G of the Income Tax Act, 1961.
- Ensure that the chosen company, firm, or NGO has a proven track record of at least three years in conducting activities that align with Schedule VII, to enhance the effectiveness and impact of selected CSR initiatives.
- Confirm that the company, firm or NGO has a CSR registration number under the Companies Act, 2013, along with a Permanent Account Number (PAN) and Tax Payer Identification Number (TIN).
- Ensure that the company, firm or NGO provides a certificate verifying its registration as a charitable institution eligible to receive donations.
- Collect and maintain transparent documentation of donation receipts, including NGO utilization reports.
- Annual reporting to the Company's Board on its CSR activities.

The annual reports delivered to the Board by the CSR Committee shall detail the status of CSR activities in each financial year. Furthermore, the Board shall report to relevant stakeholders, such as the Company's Chief Financial Officer or General Counsel, on the Company's CSR projects and progress on an annual basis or more frequently as needed, according to the CSR Requirements.

Amendments

The CSR Committee shall review the CSR Policy periodically and recommend amendments as necessary to ensure it remains relevant and in compliance with applicable laws and the interests of the Company and its stakeholders. Any amendments to the CSR Policy will be recommended by the CSR Committee and approved by the Board of Directors.

Effective Date

This CSR Policy has been approved by the Board of Directors of Check Point Software Technologies (India) Private Limited. The last update occurred on: December 5, 2024.

For further information about the Company's CSR activities and donations in the financial year, please refer to our [ESG webpage](#) and our annual environment, social and governance (ESG) report.

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