

Corporate Social Responsibility Policy

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Purpose

In accordance with Section 135 of the Companies Act, 2013 and the rules promulgated there under (collectively, the “CSR Requirements”), Mobily Infotech India Private Limited (the “Company”) has adopted this corporate social responsibility (“CSR”) Policy (the “CSR Policy”).

Vision

To be a Center of Excellence(COE), and the preferred partner for quality and cost effective solutions for the telecom and other industries.

Along with sustainable economic performance, environmental and social stewardship is also a key factor for holistic business growth. As a responsible corporate citizen, we try to contribute for social and economic development on regular basis. We believe that to succeed, an organization must maintain highest standards of corporate behaviour towards its employees, consumers and societies in which it operates. We are of opinion that CSR underlines the objective of bringing about a difference and adding value in our stakeholder’s lives.

Approach

The Company proposes to adopt one or more of the following CSR activities as prescribed by applicable laws, including Schedule VII of the Companies Act, 2013, as amended from time to time:

- (i) Eradicating hunger, poverty and malnutrition, “promoting health care including preventive health care” and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- (ii) promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities

Mobily Infotech India Pvt. Ltd.

RMZ NXT, Campus 2C, 1st floor,
Whitefield Road, Bangalore – 560066,
Karnataka, India, T: +91 80 6727100

for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.

(iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.

(v) protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts;

(vi) measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;

(vii) training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports

(viii) contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;

(ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

(x) rural development projects

(xi) slum area development.

Explanation:- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

(xii) disaster management, including relief, rehabilitation and reconstruction activities.

Constitution of Corporate Social Responsibility Committee

The Board has formed a Corporate Social Responsibility Committee (the “**CSR Committee**”) pursuant to the CSR Requirements.

The CSR Committee will carry out the following functions:

- to formulate and recommend to the Board, a CSR Policy indicating activities to be undertaken as specified in the CSR Requirements;
- to recommend the amount of expenditure to be incurred on the activities governed by the CSR Policy; and
- to monitor the CSR Policy from time to time.

CSR Projects and Programmes

All CSR projects of the company shall align with activities detailed in Schedule VII of the Companies Act, 2013 and the rules thereunder, including the notification(s)/circular(s)/memorandum(s) etc. as may be issued by the Ministry of Corporate Affairs of India with regard to the CSR activities, as amended from time to time.

All CSR projects and programmes shall be carried out only in India, and preference shall be given to area in which the Company is located. No CSR projects or programmes shall be undertaken in pursuance of normal course of business of the Company.

Implementation

The Board shall ensure that the CSR activities are undertaken by the company itself or through –

1. a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
2. 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
3. any entity established under an Act of Parliament or a State legislature; or

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4. a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of atleast three years in undertaking similar activities.

Budget

The Company shall seek to spend annually at least 2 per cent of the average net profits of the Company made during the three immediately preceding financial years, on specific CSR Projects and Programmes. For this purpose, the “net profit” and the “average net profits” shall be calculated as prescribed under the Companies Act, 2013 and rules made thereunder as may be amended from time to time. The Company shall take steps to ensure that any surplus arising out of the Company’s CSR projects and programmes or activities shall be set aside for later use in CSR projects and programmes and in no event shall form part of the Company’s business profits.

Monitoring

All projects shall undergo continuous monitoring through regular interactions and site visits to be conducted by the CSR team or any other agency contracted for the purpose. The projects will be appraised atleast half yearly by the CSR team to the CSR Committee to assess efficacy, deliverables and KPIs basis which addendums will be signed for consequent years.

Reporting

Implementation partner shall submit monitoring reports to the CSR team every quarter or according to the periodicity agreed in the MoU, details of which will be shared by the CSR team with the CSR Committee. This report would indicate:

1. Achievement since last progress report;
2. Proposed budgets for all CSR activities conducted in accordance with the CSR Policy; and
3. Actual year-to-date spends of such CSR activities conducted in accordance with the CSR Policy.

On an annual basis, the Board shall disclose the CSR details as required by the CSR Requirements.

Review of CSR Policy

The CSR Committee shall review this CSR Policy on a periodic basis and shall update it as necessary or appropriate (subject to approval by the Board) to ensure that it reflects CSR Requirements as well as the Approach of the Company and relevant stakeholders.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Document History

Version	Effective Date	Prepared by	Reviewed by	Approved by
1	22 Mar 21	Yogish Bhat	Thejas Basavaraju	CSR Committee and Board of Directors