



CORPORATE SOCIAL RESPONSIBILITY POLICY

DEN BROADBAND LIMITED



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

INTRODUCTION

Den Broadband Limited (the Company/Den Broadband) believes in Principles of “*Serving Society through Industry*”. It aims to achieve, consolidate and strengthen good corporate including socially and environmentally responsible business practices that balance financial profit with social well-being.

Our CSR vision is to actively contribute to the social and economic development of the communities in which we operate. In so doing build a better, sustainable way of life for the weaker sections of society and raise the country's human development index.

SHORT TITLE & APPLICABILITY

- This policy, which encompasses the Company’s philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large, is titled as the ‘**CSR Policy**’.
- This Policy shall apply to all CSR initiatives and activities taken up at the various offices of the Company, for the benefit of the society, a key stakeholder of the Company.
- This Policy and the operational guidelines issued herein are subject to and pursuant to the provisions of the Companies Act, 2013 (“The Act”) and the rules and regulations made thereunder.

KEY ELEMENTS OF THE POLICY

The following are the key elements of the policy:

- Vision and framework of Corporate Social Responsibility and its approach towards the same.
- Key focus areas for engagement and our Goals
- Overview of the implementation strategy of various CSR initiatives
- Governance Structure
- Funding, Selection and Monitoring Process

CORPORATE SOCIAL RESPONSIBILITY PHILOSOPHY

Den Broadband’s subscribes to the philosophy of compassionate care and committed to act on the ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. Further, the Company strives towards becoming a socially responsible corporate entity with a thrust on Community development, and education through sustained business conduct.



Den Broadband seeks to attain its CSR objectives in a professional and integrated manner, the Company has formulated policies for social development that are based on the following guiding principles:

- Adopting an approach that aims at achieving a greater balance between social development and economic development;
- Adopting new measures to accelerate and ensure the basic needs of all people including working towards elimination of barriers for the social inclusion of disadvantaged groups;
- Focusing on educating the girl child and the underprivileged by providing appropriate infrastructure, and groom them as future value creators;
- Assisting in skill development by providing direction and technical expertise to the vulnerable thereby empowering them towards a dignified life;
- Promoting an inclusive work culture;
- Working towards generating awareness for creating public infrastructure that is barrier free, inclusive and enabling for all including the elderly and the disabled;
- Promoting the well-being and development of employees and their families through an inspiring corporate culture that encourages good values;
- motivating employees of the Company to spend time volunteering on issues pertaining to CSR;
- Responding to emergency situations & disasters by providing timely help to affected victims and their families.

FOCUS AREAS OF ENGAGEMENT/GOALS

There are several opportunities to increase and deepen social impact at scale and generate value for all. Den Broadband seeks to strategically consolidate the Company's CSR initiatives to focus on discrete social problems, all aimed at **enabling lives, living and livelihoods**. Owing to its long tradition of social responsibility, the value of sustainable social impact at scale is instilled across the conglomerate.

Rural Transformation	Creating sustainable livelihood solutions, addressing poverty, hunger and malnutrition
Health	Affordable solutions for healthcare through improved access, awareness and health seeking behaviour
Education	Access to quality education, training and skill enhancement
Arts, Heritage and Culture	Protection and promotion of India's art, culture and heritage



Environment	Environmental sustainability, ecological balance, conservation of natural resources
Disaster Response	Managing and responding to disaster
Promotion of Sports	Training to promote rural sports, nationally recognized sports, Paralympics sports, Olympic sports and promote sports at gross root level
Community Development	Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes etc.
Other Initiatives	To undertake other need based initiatives in compliance with Schedule VII of the Companies Act, 2013

Rural Transformation

To work towards bridging the developmental gap between rural 'Bharat' and urban India by improving livelihood, addressing poverty, hunger and malnutrition. Key initiatives include:

- Supporting Farm and non-farm livelihoods
- Improving water conservation and rain-water harvesting
- Developing community based initiatives like VFAs and producer companies towards building capacity of the community and ensuring sustainability.
- Using technology towards delivering need based information for improving quality of life.
- Improving food security and enhancing nutrition
- Developing Community infrastructure

Healthcare

To address issues around affordability and accessibility of quality healthcare and bring about improvement in awareness and health seeking behaviour in various parts of India, enabling a better living, through initiatives such as:

- Primary, secondary and tertiary care facilities
- Conducting need based health camps and providing consultation, medicines etc.
- Working on maternal and child health
- Behavioural change for improved mother and child health
- Improving healthcare delivery through innovative outreach programmes
- Working for the visually impaired
- Working in the areas of Communicable and non-communicable diseases
- Using technology for training, competency evaluation and clinical decision support for medical professionals with a view to improve quality of healthcare



Education

To work on several educational initiatives to provide quality education, training, skill enhancement for improving the quality of living and livelihood. Initiatives are aimed at:

- Promoting primary and secondary education
- Enabling higher education through merit cum means scholarships, including for differently abled across the country.
- Using sports as a tool for development of students in both urban and rural settings
- Promoting higher education including setting up and supporting universities
- Skill development and vocational training

Environment

- To enable enhanced livelihood and quality of life, promote environment sustainability through various initiatives for:
 - Ecological sustainability
 - Promoting biodiversity
 - Conservation of natural resources
 - Maintaining quality of soil, air and water
 - Promoting renewable energy
 - Developing gardens and river fronts

Protection of national heritage, art and culture

To work towards preserving the rich heritage, arts and culture of India for its future generation and make conscious efforts to ensure its continuity and enhance avenues for livelihoods of traditional artisans and craftsmen. Key initiatives include:

- Working towards protecting and promoting India's art, culture and heritage through various promotional and developmental projects and programmes.
- Support and promotion of artists and craftsman
- Promotion and preservation of traditional art and handicraft
- Documenting India's rich heritage for the benefit of future generations

Disaster Response

To strengthen efforts in the area of Disaster Response towards establishing Den Broadband as one of the leading organizations with the capacity to respond in a timely and impactful manner in the affected areas. Key initiatives include:

- Building capacities of local communities to respond to disasters
- Developing expertise and resources to respond to disaster



- Promotion of Sports
- Training to promote rural sports, nationally recognized sports, Paralympics sports, Olympic sports and promote sports at grass root level.

Community Development

Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes etc.,

Other Initiatives

To undertake other need based initiatives in compliance with Schedule VII of the Companies Act, 2013.

IMPLEMENTATION OF CSR ACTIVITIES

Subject to the provisions of the Act, the Board or the CSR Committee as may be applicable, will undertake the CSR activities of the Company, through:

- Directly or through a registered trust, society or Company established by Den Broadband or its Holding, Subsidiary or Associate, Promoter Group Company under section 8 of the Companies Act, 2013; or
- Any other Foundations, trusts, or a Section 8 company (or erstwhile Section 25 company) or any other form of entity with a track record of at least three years in carrying out activities in related areas. While engaging with partners, Den Broadband to evaluate the credentials of the implementing entity and seek relevant documents, information and details as per **Annexure 1**;
- Den Broadband may also collaborate with other Companies or Institutions for undertaking projects or programs for CSR activities.

GOVERNANCE

Corporate Social Responsibility (CSR Committee)

The Board of Directors of the Company will constitute a CSR committee in accordance with the provisions of the Companies Act, 2013 and Rules made thereunder, as and when the mandatory requirement relating to the constitution of said committee becomes applicable to the Company.

The Board of Directors / CSR Committee, as the case may be, shall be responsible for formulating, recommending/approving, decision making with respect to the Company's CSR Policy, to review the implementation of CSR projects/programs, monitor and give suitable direction and for doing all such acts and things as may be necessary for the implementation of this Policy and matters connected therewith or incidental thereto.



Budget

- a) The Board of Den Broadband to ensure that minimum of 2% of the average net profits of the three immediately preceding financial years is spent on CSR initiatives undertaken by Den Broadband;
- b) All expenditure towards the programs to be diligently documented;
- c) In case at least 2% of the average net profits of the three immediately preceding financial years is not spent in a financial year, reasons for the same to be specified in the CSR/ Board report;
- d) Any surplus generated out of the CSR activities not to be added to the normal business profits of Den Broadband.

FUNDING, SELECTION AND MONITORING PROCESS

Den Broadband will receive requests for funding of projects throughout the year. The Board will evaluate proposals received, the focus areas and projects will be prioritized by assessing their impact.

The Board of the Company/CSR Committee, as the case may be, will deliberate on the proposals and approve the proposals for implementation at its discretion. Den Broadband's representatives and/or its Group Company Foundation or such other entity will collaborate with stakeholders to monitor the status of each project and will report its findings to the Board of the Company/CSR Committee periodically, as the case may be and in an Annual Report/Board Report to the Board of Directors.

CONCLUSION

In India the role of business has almost never been exclusively about wealth creation. Rather, there is a rich tradition of businesses contributing to social welfare, something that may stem from religious roots or from a very socialistic understanding of business purpose. It may be said that the outlook for CSR in the country looks positive, with several stakeholders stepping up to take action. As for those who are already active, there is a slow but sure movement towards a more holistic and strategic understanding of what CSR really means. India will, it seems, continue to evolve unique and innovative models of CSR in response to its challenges. Not only corporate, but individuals too, as personal wealth increases, will contribute more to social development, and the overall ethos of giving will be synergistic between individuals and organizations.

The emerging legislation is bound to push reluctant actors and is already introducing some innovative elements. Thus, all in all, it seems that both corporate CSR and personal philanthropy in India are only going to increase.



The Company will review the Policy from time to time based on changing needs and aspirations of the target beneficiaries and make suitable modifications, as may be necessary.



Annexure-1

Indicative list of aspects to be considered while engaging with other entities

1. Due diligence of the implementing agency would be conducted to check the credentials of the organization. The following information from the interested implementing agencies *inter alia* would be sought, as relevant:
 - i. Memorandum/Article of Association or Constitution;
 - ii. Registration Certificate;
 - iii. Registration Certificate under Section 12A;
 - iv. Audited Accounts of last three years;
 - v. IT Exemption Certificate under Section 80G; (Lifetime validity)
 - vi. Pan Card;
 - vii. IT Exemption Certificate under Section 35(i), if available;
 - viii. Acknowledgement of Income Tax Return along with IT Return filed (last three years);
 - ix. FCRA Certificate (if any) and latest copy of FCRA Return FC-3, if available;
 - x. Description of the project.
2. Ensure that the project/ programme is consistent with list of activities in Schedule VII.
3. The team may visit and/or meet the representatives to assess the organization (as required).
4. Quarterly reporting on the progress in implementation of the projects/ programmes and utilization of the amounts.
5. Reserving the rights, to be exercised at its sole discretion, of stopping the funding at any stage of the project, if the program is not being implemented as per program objectives and goals.