

GTPL BROADBAND PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)

Applies to	GTPL Broadband Private Limited
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Issuing Authority	Board of Directors of the Company
Content Owner	Secretarial

INTRODUCTION

GTPL Broadband Private Limited (“GTPL BB” or “the Company”) is one of the largest private Broadband service providers.

GTPL BB is vigilant in its enforcement towards corporate principles and is committed towards sustainable development and inclusive growth. The Company constantly strives to ensure strong corporate culture, which emphasizes on integrating Corporate Social Responsibility (CSR) values with business objective. It also pursues initiatives related to quality management, environment preservation and social awareness.

SCOPE

This policy is applicable to GTPL BB. 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

GTPL BB 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.

GTPL BB 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

In accordance with the requirements under the Companies Act, 2013 ("the Act"), GTPL BB, CSR activities, amongst others, will focus on:

HUNGER, POVERTY, MALNUTRITION AND HEALTH: Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.

EDUCATION: Promoting education, including special education and employment-enhancing vocational skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies.

RURAL DEVELOPMENT PROJECTS: Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.

GENDER EQUALITY AND EMPOWERMENT OF WOMEN: Promoting gender equality and empowering women; setting up homes, hostels and day care centers for women and orphans; setting up old age homes and such other facilities for senior citizens; and adopting measures for reducing inequalities faced by socially and economically backward groups.

ENVIRONMENTAL SUSTAINABILITY: Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water.

NATIONAL HERITAGE, ART AND CULTURE: Protecting national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promoting and developing traditional arts and handicrafts.

GOALS

Our goals include the following:

Sl. No.	Goal Area	Actions
1.	Hunger, poverty, malnutrition and healthcare	GTPL BB will work to improve livelihoods, addressing poverty, hunger and malnutrition and accessibility of quality healthcare and bring about improvement in awareness and health seeking behavior in various parts of India, enabling a better living, Key Initiatives includes • Improving food security and enhancing nutrition; • Supporting poverty and malnutrition projects, promote preventive healthcare and sanitation, safe drinking water; • Primary, secondary and tertiary care facilities; • Conducting need-based health camps and providing consultation, medicines etc. • Working on maternal and child health.
2.	Education	GTPL BB will focus to work on several educational initiatives to provide quality education, training, skill enhancement, Key Initiatives include • Promoting primary and secondary education; • Promoting higher education including setting up and supporting universities; • Enabling higher education through merit cum means scholarships, including for differently abled across the country. • Skill development and vocational training.
3.	Rural Development	We believe that the well-being of people living in rural areas ensures sustainable development. We will work with local administrations to achieve Community development goals. We will partner with governments and NGOs and support them in improving infrastructure such as constructing roads, providing drainage systems and electricity, and rehabilitating natural-disaster affected victims in rural areas.
4.	Gender equality, environmental sustainability, art and Culture	GTPL BB will among other things, focus on promoting gender equality and empowering women, ensuring environmental sustainability, ecological balance, protection of flora and fauna and protection of national heritage, art and culture including restoration of buildings and sites of historical importance.
5.	Other Initiatives	To undertake other need-based initiatives in compliance with Schedule VII of the Act.

MODE OF IMPLEMENTATION OF CSR ACTIVITIES

GTPL BB will undertake its CSR activities, approved by the CSR Committee through any of the below mode:

- a) Directly or through 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 (43 of 1961), established by the company, either singly or along with any other company;
- b) 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 at least three years in undertaking similar activities;
- c) 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;
- d) any entity established under an Act of Parliament or a State legislature.

GTPL BB may also collaborate with other companies or institutions for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with the relevant Rules made thereunder.

While engaging with partners, GTPL BB to evaluate the credentials of the implementing entity and seek relevant documents, information and details as per Annexure 1.

GOVERNANCE

Corporate Social Responsibility (CSR) Committee

- a) GTPL BB's Board of Directors have formed a CSR Committee in accordance with the requirements of the Act and relevant Rules made thereunder. This Committee is responsible for formulating CSR Policy and the decision making with respect to CSR policy.
- b) CSR Committee recommended the policy to GTPL BB's Board of Directors and the Board of Directors have approved this policy.
- c) The CSR Committee to meet at least once a year to review the implementation of CSR projects/ programs, monitor and give suitable direction.
- d) The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of the CSR Policy, which shall include the disclosures in accordance with the Act and the relevant Rules made thereunder.

Provided that the Board may alter such plan at any time during the financial year as per the recommendation of the CSR Committee.

Budget

- a) The Board of GTPL BB to ensure that the Company spends, at least 2% of the average net profits of the Company made during the three immediately preceding financial years on CSR initiatives to be undertaken by GTPL BB;
- b) All expenditure towards the programs to be diligently documented;
- c) The Board of GTPL BB to institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company;
- d) The Board of GTPL BB to ensure that the administrative overheads shall not exceed 5% of the total CSR expenditure of the company for the financial year;
- e) The Board shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer shall certify to this effect;
- f) In case of ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

Treatment of unspent amount and Set-off of excess amount spent on CSR activities for the financial year

The treatment of any unspent amount and excess amount spent for a financial year should adhere to the specific requirements of Section 135 of the Act read with the relevant Rules made thereunder.

Funding, Selection and Monitoring Process

GTPL BB will receive requests for funding of projects throughout the year. GTPL BB management will evaluate proposals received, the focus areas and projects will be prioritized by assessing their impact. GTPL BB management through Managing Director will then forward its recommendations to the CSR Committee.

The CSR Committee will deliberate on the proposals and approve the proposals for implementation at its discretion. GTPL BB representatives or such other entities will collaborate with the stakeholders to monitor the status of each project and will report its findings to the CSR Committee periodically and an Annual Report to the Board of Directors.

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 would be sought, as relevant:
 - i. Memorandum/ Article of Association or Constitution;
 - ii. Registration Certificate;
 - iii. MCA Registration details and a unique CSR Registration Number
 - iv. Registration Certificate under Section 12A of the Income Tax Act, 1961;
 - v. Audited Accounts of last three years;
 - vi. IT Exemption Certificate under Section 80G of the Income Tax Act, 1961; (Lifetime validity)
 - vii. Pan Card;
 - viii. IT Exemption Certificate under Section 35(i) of the Income Tax, 1961, if available;
 - ix. Acknowledgement of Income Tax Return along with IT Return filed (last three years);
 - x. FCRA Certificate (if any) and latest copy of FCRA Return FC-3, if available;
 - xi. Description of the project.
2. Ensure that the project/ programme is consistent with list of activities in Schedule VII of the Act.
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.