

Indus Towers Limited
Corporate Social Responsibility Policy



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TOWERS

1. Objective:

Indus Towers' Corporate Social Responsibility (CSR) policy is intended to ensure that its CSR programs reflect its vision and values, and is aligned with the applicable regulatory requirements. Indus Towers aspires to undertake CSR programs that can transform the lives of communities and foster a culture of mutual respect and trust. In order for its CSR programs to be transformational, Indus Towers plans to co-create solutions to address societal needs by actively collaborating with communities, NGOs, foundations, customers, and partners.

2. Applicability:

This policy shall apply to all the CSR activities of Indus Towers.

3. Guiding principles for CSR at Indus Towers:

- Focus areas for the CSR programs of Indus Towers, in light of Schedule VII of The Companies Act 2013 are:
 - ✓ Promoting preventive healthcare and sanitation and making available safe drinking water.
 - ✓ Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
 - ✓ Empowering women, setting up homes and hostels for women and orphans and measures for reducing inequalities faced by socially and economically backward groups.
 - ✓ Ensuring environmental sustainability, ecological balance and conservation of natural resources and maintaining quality of soil, air and water.

- The Company has identified projects in line with above focus areas. The list of such identified projects is given in **Annexure 1**. New projects or programs may be added in the Annexure 1 from time to time as and when the same are approved.
- Any surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.
- CSR projects of the Company are expected to:

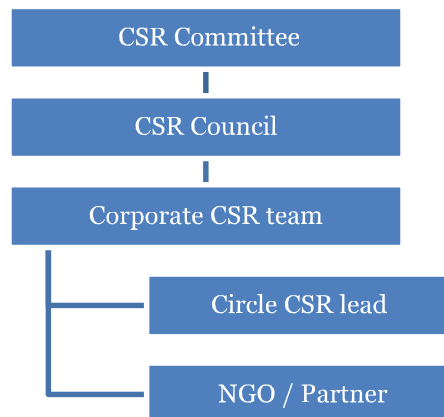
- ✓ Be delivered through replicable models; and
- ✓ Create meaningful impacts at large scale.

4. Approach to adopt CSR program:

The Company shall adopt following approach for CSR programs and projects:

- Participate in established and mature CSR programs being implemented by credible partners
- Co-create CSR programs with communities, NGOs and foundations and with customers and partners
- Work with trusts, societies or Section 8 companies (earlier known as Section 25 companies) that are credible, mature, well managed and are recognized under Income Tax Act
- Encourage employee volunteering, preferably through skills-based volunteering, to contribute meaningfully to the lives of local communities
- Build capacities of employees on CSR and implementing agencies on monitoring and evaluation through credible institutions

5. Monitoring and implementation mechanism:



A **CSR Committee** of the Board, comprising at least three directors of the Board, out of which at least one shall be an independent director, will be responsible to:

- Ensure implementation of CSR policy and monitoring thereof is, in letter and spirit, in compliance with CSR objectives
- Earmark CSR amount for CSR programs

- Recommend CSR projects, their annual budget and annual operating plans to the Board
- Approve the monitoring mechanisms for their implementation
- Submit quarterly reports to the Board on the status of implementation and CSR spend
- Recommend deviations, if any, in CSR programs or projects, to the Board for approval
- Submit Annual Report on CSR, in compliance to The Companies Act 2013 for inclusion in company's annual board report

A **CSR Council** comprising CEO, COO, CHRO, and Chief of Sustainability, headed by CEO. The Council will report to the CSR Committee and its responsibilities will be to:

- Ensure corporate commitment towards CSR
- Recommend CSR programs and projects, their monitoring mechanism and modalities of execution, annual budget and annual operating plans to the CSR Committee
- Undertake monthly review of CSR programs and projects, spend and operating plan
- Notify deviations to CSR program and projects to the CSR Committee, if any
- Submit periodic update reports to the CSR Committee on the status of implementation and CSR expenditure incurred
- Review the outcome and impact assessment of the CSR programs and projects
- Submit Annual Report on CSR activities in compliance to The Companies Act 2013 to the CSR Committee.

A **corporate CSR team** headed by “Chief of Sustainability” will report to the Council. The team's responsibilities will be to:

- Conceptualize CSR projects and develop proposals, monitoring mechanisms, modalities of execution, annual budget and operating plan for approval
- Request changes to CSR programs or projects
- Develop operating procedures including implementation partner due diligence criteria
- Engage and forge partnerships for the CSR projects with customers, foundations, NGO, and partners
- Ensure participation from circle while implementing CSR projects
- Submit monthly, quarterly and annual reports on implementation of the CSR programs and projects to the Council

- Undertake regular outcome on monitoring and impact assessment of the CSR programs and projects

The corporate CSR team will draw support from the relevant function heads.

6. Deviations/Exceptions/Revisions:

Any exception to the above will require an approval from the Board based on the recommendation of the CSR Committee.

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Annexure 1

List of CSR Focus Area (in line to Schedule VII of The Companies Act 2013) and ongoing projects:

S. No.	Focus Area (in line with Schedule VII of The Companies Act 2013)	Projects	Modalities of execution
1	Ensuring environmental sustainability, ecological balance and conservation of natural resources and maintaining quality of soil, air and water	<p><u>LaBL:</u></p> <p>Creating environment friendly energy access and livelihood by provisioning solar based lighting solutions in villages</p>	In partnership with The Energy and Resources Institute (TERI)
2	Empowering women, setting up homes and hostels for women and orphans and measures for reducing inequalities faced by socially and economically backward groups.	<p><u>Adoption of SOS Village:</u></p> <p>Providing environment with love, security and respect to orphans / abandoned children.</p>	In partnership with SOS Children's Villages of India
3	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.	<p><u>The Satya Bharti School Program:</u></p> <p>Supporting school operations</p>	In partnership with Bharti Foundation
4	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.	<p><u>Scholarships:</u></p> <p>to needy and deserving students for undergraduate and postgraduate professional courses</p>	In partnership with A World Of Opportunity Foundation (AWOOF)

5	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.	<u>Learn Out of The Box (LOTB):</u> Self-learning open educational centre	In partnership with Pratham Education Foundation
6	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.	<u>Community Information Resource Centre (CIRC) Programme:</u> Setting up digital learning centres for women	In partnership with Digital Empowerment Foundation
7	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.	<u>Girls Education Programme:</u> Providing quality education to rural out of schools girls.	In partnership with IIMPACT
8	Empowering women, setting up homes and hostels for women and orphans and measures for reducing inequalities faced by socially and economically backward groups.	<u>Rural Enterprises:</u> Generate employment opportunities for the members of SEWA, strengthen the small famers and SEWA's agriculture campaign using IT tools and applications and provide food security to SEWA members	In partnership with Mahila Sewa Trust
9	Promoting education, including special education and employment enhancing vocation skills especially among children, women,	<u>Digital Info Centre:</u> To reduce the digital divide and to empower women and youth by imparting knowledge	In partnership with Hand In Hand India

	elderly, and the differently abled and livelihood enhancement projects.	on internet usage through effective use of smart phones.	
10	Promoting preventive health care and sanitation and making available safe drinking water.	<u>Community Toilets:</u> Construction of public toilet complexes	In partnership with Sulabh Sanitation Mission Foundation
11	Empowering women, setting up homes and hostels for women and orphans and measures for reducing inequalities faced by socially and economically backward groups.	<u>Financial Literacy:</u> Socio- Economic empowerment through digital & Financial inclusion	In partnership with Vodafone Foundation
	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.	<u>Education:</u> Improving the knowledge & class room skills of teachers & scholarship facilitation.	

New projects identified under the focus area mentioned in the policy, shall be added from time to time.