



**EXICOM TELE-SYSTEMS LIMITED**

**CORPORATE SOCIAL RESPONSIBILITY POLICY**

*(Amended on August 11, 2023 and effective from August 11, 2023)*

## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

### **Background**

In conformity with the requirements laid down under The Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as the “CSR Rules”) issued by the Ministry of Corporate Affairs (“MCA”), Government of India under Section 135 of the Companies Act, 2013 (“the Act”) and schedule VII, the CSR Committee of the Board had drafted a CSR Policy, which was approved by the Board of Directors at their meeting held on 04.05.2016.

Later, in view of the various Circulars issued by the MCA clarifying various aspects of CSR Rules and also certain amendments made to Schedule VII to the Companies Act 2013 to enhance the list of activities that will qualify as CSR activities in order to incorporate further changes in the CSR Policy of the Company, the CSR Committee of the Board had revised the CSR Policy once again, which was approved by the Board at its meeting held on July 25, 2019. The Policy can be downloaded from the website of the Company at <https://www.exicom-ps.com>.

### **Preamble**

Exicom Tele-Systems Limited (hereinafter referred to as “the Company”), recognizes the impact it has on communities in which it operates and believes that it has a tremendous opportunity to change the lives of these communities and aims to be a trusted partner contributing to the social, economic and environmental progress of India. As part of its dedicated approach to create economic opportunity in the communities in which it operates, the Company has been contributing its time, expertise and resources to help communities and undertaking a series of initiatives that are domestically relevant.

### **CSR Objectives**

It is Company’s belief that a company's performance must be measured by its Triple Bottom Line contribution to building economic, social and environmental capital towards enhancing societal sustainability. The Company would carry out its CSR activities with the objective of overall National and Community Development. At the same time, the Company would give preference to the local areas around the locations where it operates in India for spending the amount earmarked for CSR activities.

The Company will undertake CSR activities to do overall good to the community, with special emphasis on activities for the benefit of the poor and needy sections of the society; preventive health care and environmental sustainability.

In terms of the CSR rules issued by the MCA the Company will be focusing on undertaking the project /programs /activities listed below, as specified in Schedule VII

to the Act excluding activities undertaken in pursuance of normal course of business of a Company:

- (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 vocation 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 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;
- (vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sport
- (viii) contribution to the prime minister's national relief 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) contributions or funds provided to technology incubators located within academic institutions which are approved by the central govt.
- (x) rural development projects]
- (xi) slum area development
- (xii) disaster management, including relief, rehabilitation and reconstruction activities

### **What is not CSR**

CSR activities will not, however, include the following:

- ☐ Activities undertaken in pursuance of Company's normal course of business;
- ☐ Activities which benefit only the employees of the Company and their families;

- ☐ Contribution directly or indirectly to any political parties;
- ☐ Activities undertaken outside the country;

### **Monitory process:**

The CSR Committee shall monitor the implementation mechanism.

### **Implementation process:**

Before startup of any project, CSR Committee shall discuss with the Committees, Board, Staff, Local Government Officials, Local Leaders or other Influencers.

The Company shall undertake its CSR activities directly or through any Registered Society, or a company established by the Company or its holding or subsidiary or associate company under Section 8 of the Companies Act, 2013 and Registered Trust as may be decided by the CSR Committee and Board of Directors.

### **Budget:**

A specific budget shall be allocated for each of the above mentioned proposed CSR activities to be undertaken by the Company as per the stipulation under Companies Act, 2013 mandating 2% of 3 years Adjusted Average Net Profit. If the Company fails to spend the aforesaid amount then the Board's Report prepared under section 134 of the Act, shall specify the reasons for not spending the amount and transfer the same as specified under this Policy and CSR Legal Framework.

### **CSR spending:**

Board of Directors shall ensure that the Company spends in every financial year, the requisite funds in pursuance of CSR policy provided that the preference shall be given to the local areas around which it operates for spending the amount earmarked for CSR activities.

Any amount remaining unspent under sub-section (5) of Section 135, pursuant to any ongoing project, fulfilling such conditions as may be prescribed, undertaken by a company in pursuance of its CSR Policy, shall be transferred by the company within a period of 30 days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

**Surplus arising out of CSR activities:**

The surplus arising out of the CSR projects or programme or activities shall not form part of the business profit of the Company.

**Information dissemination:**

The Content of CSR Committee policy shall be displayed at the Company's website and in the Annual Report of the Company.

**Display of CSR activities on its website:**

The Board of Directors of the Company shall mandatorily disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.

**General**

The CSR Policy referred to above is to be read in conjunction with Companies Act, 2013 and Companies (Corporate Social Responsibilities Policy) Rules, 2014.

Any or all provisions of the CSR Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued from the Government from time to time or as decided by the Board of Directors of the Company.

**Contact**

For any clarification / query related to CSR policy of the company, please contact:

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