

# **CSR POLICY – MEGA NETWORKS PRIVATE LIMITED - 2024**

## **1.INTRODUCTION**

Corporate Social Responsibility (CSR) is the Company's commitment to its stakeholders to conduct business in an economically, socially and environmentally sustainable manner that is transparent and ethical.

Mega Networks Private Limited in India is committed to undertake CSR activities in accordance with the provisions of Section 135 of the Companies Act, 2013 and related Rules.

The company commits itself to contribute to the society in ways possible for the organization and has set up its committed core CSR team, as a means for fulfilling this commitment.

## **2. AIMS & OBJECTIVES**

To develop a long-term vision and strategy for the company's CSR objectives  
Establish relevance of potential CSR activities to Mega Networks core business and create an overview of activities to be undertaken, in line with Schedule VII of the Companies Act, 2013.

## **3. CSR ACTIVITY**

The company shall promote activities which are mentioned in Annexure 1 of this policy.

## **4. CSR COMMITTEE**

CSR Committee shall be formed as per the applicable laws and the committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy. The CSR Committee shall submit periodical reports to the board of directors.

## **5. CSR BUDGET AND SPENDS**

1. The Act mandates companies meeting the qualification criteria to allocate certain portion of its annual net profits (before tax) during the three immediately preceding financial years to be spent on CSR Activities that fall under purview of Schedule VII to the Act.

2. Net profit means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII to the Act.

3. CSR expenditure shall not include Projects or programs or outside India.

4. Surplus (A surplus is anything that is generated over expenditure on that particular project) generated by a CSR project must not be considered in the normal business profits of the Company but must be channelized into its CSR corpus. Hence, the CSR corpus of the Company for the succeeding year would include such surpluses, over and above the Company's 2% calculation.

5. If a surplus is being generated by any of these projects, it must be noted that the surplus must be considered only in the year that the CSR amount is being spent. Also, the surpluses that are generated must be directly related to the activity being performed.

6. Contributions by other Schindler companies and employees may also be activities undertaken and above the total received and utilized in respect of the CSR activities undertaken.

7. In case the Company fails to spend the above targeted amount in that particular financial year, the Committee shall submit a report in writing to the Board of Directors specifying the reasons for not spending the amount which in turn shall be reported by the Board of Directors in their Directors' Report for that Financial Year.

## **6. DUTIES & RESPONSIBILITIES OF CSR COMMITTEE**

Formulate and recommend to the Board the CSR activities/programs to be undertaken by Mega Networks.

Recommend the Board the CSR Expenditure to be incurred on the CSR activities/programs.

Institute a transparent mechanism for implementation of the CSR projects and activities.  
Effectively monitor the execution of the CSR activities.

Prepare an annual report of the CSR activities undertaken for Mega Networks and submit the report to the Board.

## **7. PUBLICATION OF CSR POLICY AND PROGRAMS**

As per the CSR Rules, the contents of the CSR Policy shall be included in the Directors' Report and the same shall be displayed elsewhere as Directors of the Company decide.

## **8. POLICY CHANGE**

The Committee shall annually review its CSR Policy from time to time and make suitable changes as may be required and submit the same for the approval of the Board.

## **9. IMPLEMENTING CSR ACTIVITIES**

The implementation and execution of the CSR activities/projects shall be carried out through the Mega Networks CSR working committee members, headed by the CSR Committee Directors.

Mega Networks shall undertake the CSR activities directly and also through various implementing agencies such as, NGO's, non-profit organizations, etc. Such implementing agencies shall have an established track record as prescribed under the law.

Mega Networks may collaborate with other companies for undertaking the CSR projects/programs subject to fulfilment of separate reporting requirements as prescribed in the Rules.

Some of the initiatives taken up by Mega Networks will facilitate the involvement of Mega Networks employees as volunteers in ongoing CSR activities and events, giving them an opportunity to engage in socially meaningful activities, thus, enabling them to realize their full potential and role as socially responsible citizens (Employee Volunteer Programs).

The initiatives undertaken may be communicated to the employees through specific awareness campaigns, so as to enable maximum participation.

## **10. CSR REPORTING**

The Board in its Annual Report shall include the details of the CSR activities undertaken in the Financial Year.

The CSR Committee shall provide an annual report on the implementation and monitoring of the CSR Policy and that it is in compliance with CSR objectives of Mega Networks, which statement shall form part of the Boards' Report.

#### **11. DISCLOSURE**

All disclosures, display and reporting requirement related to CSR shall be made in accordance with the provisions of the Act and Rules made thereunder.

#### **12. ADOPTED ON**

This Policy was adopted by the Board of Directors of the Company in its meeting held on March 04, 2024.

## Annexure 1: Activities under Schedule VII to the Companies Act, 2013

- Eradicating Hunger, poverty and malnutrition, 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 differently abled and livelihood enhancement projects
- Promoting Gender equality, empowering women, setting up homes, and hostels for women and orphans; setting up old age homes, day care centers and other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups
- Ensuring Environmental Sustainability, Ecological Balance, Protection of Flora and Fauna, Animal Welfare, Agroforestry, Conservation of Natural Resources and Maintaining the Quality of Soil, Air and Water
- Protection of National Heritage, art and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts
- Measures for the benefit of armed forces veterans, war widows and their dependents
- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics
- Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for Socio-Economic development for relief and development of SCs, STs, OBCs, minorities and women
- Contributions For the purposes of this the item, or funds provided to Technology Incubators located within Academic institutions approved by the Central Government
- Rural Development Projects

### Slum area Development

Explanation – 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.