
**CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY OF
ASCEND TELECOM INFRASTRUCTURE PRIVATE LIMITED**

This policy sets out the Company's commitment & approach towards Corporate Social Responsibility based on our legacy of 'Giving Back to Society'. The Company is committed to the Purpose of improving the quality of life of the communities we serve through the CSR. The Company endeavours to facilitate livelihood opportunities & socio-cultural development in areas of its operations.

Vision

"Create a positive influence in the communities and societies where we operate."

Innovation, collaboration and impact define our social investments, which are embedded in our brand strategy and our stakeholder engagement plan. We commit resources of our company and employees to contribute to relevant social issues on education, orphanages, destitute, old age homes and ecosystem. Our aim is to help find solutions to these challenges in a sustainable manner.

Objectives and Commitments

Education, Ecosystems and Road safety will form the core themes around which Ascend Telecom Infrastructure Private Limited (ATIPL) will create and drive their local plans in respect of Corporate Social Responsibility (CSR). The objective is to make significant and meaningful contribution with measurable benefits. ATIPL's CSR policy focus areas aim to be aligned with the activities prescribed in Schedule VII read with Clause 135 of the Companies Act, 2013.

1. Education

Promoting Education among children – To support the opportunities in primary education through regular supply of note books, visiting schools for special education to economically disadvantaged and government school children. This effort will focus on girl children to help them build a better future for themselves, their families, as well as their immediate communities.

This programme will be implemented through Non-Government Organisations (NGOs) with relevant expertise and experience. Staff volunteers would also be invited to be part of this initiative who will participate as mentors to develop soft and inter-personal skills.

2. Environmental Sustainability

ATIPL will initiate a programme for greening our ground based sites (GBT) and seek opportunities to provide jobs to the have-nots around our sites. This programme would be implemented through our field staff and will aim to use the available local sources and benefits of such vegetation planted around our sites will be passed on to the community in that locality.

3. Support to destitute homes

Each supported activity is aim to complete its objective by the end of the support period. The policy will ensure that particular number of destitute homes are selected for providing seasonal health needs and clothing.

Implementation

CSR Committee constitutes of management team of ATIPL. CSR Projects or Programmes would be implemented in the country through NGOs and agencies following the approval of CSR Committee. Selection of NGOs and agencies will be based on contracting and procurement guidelines including due diligence. The CSR Committee would decide on the budget for each Project/Programme and monitor the CSR policy from time to time.

CSR Committee:

The CSR Committee shall comprise three or more FHs. The CSR Committee of the Company shall be responsible for: a. Formulating and recommending to the Board the CSR Policy which shall indicate activities to be undertaken in line with Section 135 read with Schedule VII of the Act. b. Recommending to the Board the CSR expenditure to be incurred. c. Monitor the implementation of the CSR Policy from time to time.

CSR Committee has been appointed for Ascend. Its members are:

- 1) Mr. Vivek Sett
- 2) Mr. Milind Joshi and
- 3) Dr. Harry CD

Monitoring

CSR activities will follow a need-based assessment and each activity will be monitored closely on the progress and developments on a quarterly basis against key parameters.

A Joint Working Group (JWG) comprising of employees of ATIPL and representative of entities, involved in planning and implementation of the projects and programmes, will be

created to ensure effective implementation and monitoring of the projects approved by CSR Committee. JWG will submit quarterly reports to CSR Committee on the progress of various projects approved by CSR Committee and entrusted to JWG for implementation and monitoring. Such reports will explicitly specify modality of execution of CSR programs and progress on meeting implementation schedules. The monitoring mechanism will ensure that:

- CSR Programmes are on target and meeting their objectives;
- Objectives are still appropriate and relevant;
- Projects and programmes are delivering benefit in terms of stakeholder perception and against agreed indicators;
- Funds are being used appropriately and records of spending are being maintained; and
- Stakeholders, notably the beneficiaries, view the project or programme positively.

CSR Budget:

The amounts to be spent by the Company shall be as stipulated under the Act, as amended from time to time (presently 2% of the average net profits of the Company for the preceding three financial years) and as approved by the Board. Any surplus arising out of the CSR projects or programs or activities shall not form part of business profits of the Company.

Surplus of CSR Projects

Subject to the provisions of Companies Act, 2013, the surplus, if any, arising out of CSR Projects, Programmes and activities shall not form part of business profits of the Company.