E2E Networks

CORPORATE SOCIAL RESPONSIBILITY POLICY

PURPOSE

This policy is being framed in accordance with the requirements of Section 135 and other applicable sections of the Companies Act 2013 (**"the Act"**) (as may be amended from time to time), rules notified thereunder and any other applicable statutory provision(s) (collectively referred to hereinafter as **"CSR Provisions"**). All CSR programmes of the Company shall be carried out in accordance with this policy.

PHILOSOPHY

Recognizing that business enterprises are economic organs of society and draw on societal resources, it is **"E2E Networks Limited"** (**"Company"**) belief that a Company's performance mustbe measured by its Triple Bottom Line contribution to building economic, social and environmental capital towards enhancing societal sustainability. Company believes that in the strategic context of business, enterprises possess, beyond mere financial resources, the transformational capacity to create game-changing development models by unleashing their power of entrepreneurial vitality, innovation and creativity. In line with this belief, Company will continue crafting unique models to generate livelihoods and environmental capital. Such Corporate social responsibility (**"CSR"**) projects are far more replicable, scalable and sustainable, with a significant multiplier impact on sustainable livelihood creation and environmental replenishment. These initiatives are independent of the normal conduct of Company's business. Programmes, Projects and activities (collectively **"CSR Programmes"**) carried out in this regard are the subject matter of this policy.

PREAMBLE

Company seeks to be a good corporate citizen in all aspects of its operations and activities. It is the Company's intent to make a positive difference to society. The focus of CSR efforts would be to do fewer projects with greater impact in the local areas and areas around which the Company operates. The Company may also undertake projects within India in other areas where it deems fit or where societal needs are high. We not only acknowledge but firmly believe in the fact of giving back to the society.

VISION AND COMMITMENTS

Our vision is to drive "holistic empowerment" of the community through implementation of sustainable initiative which will have maximum societal impact by identifying the critical needs and gaps.

We shall remain committed to the following operating principles-

- Conducting business in a socially responsible and ethical manner;
- Protecting the environment and the safety of the people;
- Supporting human rights; and
- Engaging, learning from, respecting and supporting the local communities and cultures with which we work.

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CSR OBJECTIVES

The Company shall carry out any one or more of the CSR activities, notified under Section 135 of the Companies Act, 2013 and rules made there under, as amended from time to time, with a focus on following areas:

1. To fight against hunger, poverty and malnutrition.
2. To promote heath care including rehabilitation health.
3. To promote education and enhance vocational skills especially among children, women and differently-abled persons.
4. To facilitate rural development and slum area development.

However, the CSR Committee shall have authority to decide to carry out any other CSR activities within the purview of permissible activities under the Companies Act, 2013 from time to time.

Further, the CSR Committee may under the above areas identify and recommend to the Board "Ongoing Project/s" that requires multi-year implementation but not having timelines exceeding three years excluding the financial year in which it commences, and also may designate some of the existing CSR projects as an Ongoing Project and such Ongoing Projects shall be selected, implemented, monitored and reported in accordance with the applicable CSR Provisions.

CSR COMMITTEE

The Company's CSR governance structure will be headed at the Board level CSR Committee that will be responsible for CSR activities/project undertaken. The Committee will report to the Board of Directors of the Company. The CSR Committee shall comprise of at least three directors, one of whom shall be independent director. The Board shall be empowered to modify the composition of CSR committee, provided that there shall always be at least one independent director as a part of CSR Committee or such other composition as may be prescribed under applicable laws from time to time.

SELECTION AND IMPLEMENTATION OF CSR ACTIVITIES

The CSR Committee shall be responsible for selection of CSR Activities to be undertaken by the Company and their implementation and monitoring. CSR Committee shall be in particular responsible for:

- Formulating CSR Policy, inter-alia in compliance with the Section 135 of the Companies Act, 2013 and Schedule VII thereof and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as may be amended from time to time;
- Identifying and recommending to the Board, from time to time, the activities/projects in line with such CSR policy and seeks its approval for expenditure thereon, from the Board of Directors of the Company;
- formulating and recommending to the Board an annual action plan which will include

(i) the CSR project/programme which will be undertaken by the Company in the relevant financial year.

(ii) the manner of execution of such CSR project/programme

(iii) the modalities of utilisation of funds and implementation schedules for such CSR project/programme

(iv) monitoring and reporting mechanism for such CSR project/programme

(v) details of need and impact assessment, if any, for the projects undertaken by the company

- Any alteration in the annual action plan, if required to be done, post approval of the plan.
- Recommend to the Board, modifications to the CSR Policy as and when required
- The CSR Committee shall recommend adoption of the CSR report to the Board of Directors of the Company and shall review the effectiveness of the CSR Policy and activities included in the Policy.

MONITORING OF CSR ACTIVITIES

The CSR Committee and the Board shall monitor and review the performance and impact of the CSR programmes undertaken by the Company, shall provide input and course corrections if required and shall satisfy themselves that the CSR funds disbursed by the Company have been utilized for the purposes and in the manner as approved by them. The CFO or any other person responsible for financial management so authorized by Board shall certify to the fact that CSR funds so disbursed have been utilised for the purposes and in the manner approved by the Board.

ANNUAL ACTION PLAN

While formulating annual action plan, following broad principles/areas shall be considered:

a. Identification of Project and Programmes, Activities/Initiatives to be undertaken in the said Project;

b. Identification of activity mentioned in Schedule VII of the Act under which said Programmes/Activities/Initiatives fall;

c. Modalities of execution of Programmes/Activities/Initiatives i.e whether Programmes/Activities/Initiatives executed directly by the Company or through third party,

d. Implementation Schedule/Timelines of Programmes/Activities/Initiatives

e. Identification of tools/processes for monitoring the implementation, evaluation and impact, of Programmes/Activities/Initiatives

CSR BUDGET/EXPENDITURE

The total budget for the CSR activities/projects will be recommended by the CSR Committee and shall be approved by the Board of Directors of the Company. The minimum CSR budget shall be in accordance with the CSR Provisions, as may be amended from time to time. However, the CSR Committee and Board shall have power to approve the CSR budget in excess of minimum requirements prescribed under CSR Provisions on voluntary basis also.

If the company fails to spend minimum CSR expenditure in accordance with applicable CSR provisions, then the Board, in its Board report shall specify the reasons for not spending the amount and, unless the unspent amount relates to any ongoing project, transfer such unspent amount to a Fund specified under CSR Provisions, within a period of six months of the expiry of the financial year.

Any unspent CSR amount pursuant to any ongoing project, shall be transferred by the company within a period of thirty days from the end of the financial year to a special bank account to be opened by the company in that behalf 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 CSR Provisions, within a period of thirty days from the date of completion of the third financial year.

The CSR activities undertaken by the Company are not expected to lead to any additional surplus beyond what would accrue to the Company in the course of normal operations. However, surplus if any arising out of the CSR Projects or Programs shall not form part of the business profit of the Company and shall be dealt with in accordance with the applicable CSR Provisions. Likewise, any excess amount spent on CSR activities may be set off against the requirement to spend in the succeeding financial years in accordance with the applicable CSR Provisions. In the event the Company creates or acquires capital asset out of the CSR spend, such capital asset will be dealt with in terms of the applicable CSR Provisions.

WEBSITE DISCLOSURE

The CSR Policy alongwith details of all CSR Projects undertaken by the Company shall be displayed on the website of the Company.