

## CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

CompTEL Communications India Pvt Ltd is committed to operating its business in a manner that is both ethical and responsible with proper regard to its legal obligations and in accordance to relevant directives and regulations. It believes in continuous commitment to behave in a sensitive manner and contribute to economic development while improving the quality of life.

The company strictly adheres to the guidelines and mandates given under Section 135 and Schedule VII of Companies Act and Companies (CSR Policy) Rules.

### POLICY OBJECTIVES AND SCOPE

The objective of the CSR Policy is to lay down guidelines for the company for planning, designing and executing its corporate social responsibility efforts.

This policy is applicable to CSR initiatives of the company.

A CSR working group comprised of multisectoral professionals will support the board in overseeing implementation of CSR projects.

### ROLES & RESPONSIBILITIES

#### Board of the company - roles and responsibilities

- The Board will be the approving authority for the all CSR projects to be undertaken and their duration.
- The Board will be responsible for overseeing the designing, developing, execution of the projects.
- The Board will carry out periodic monitoring of the ongoing projects and shall be competent to make modifications if necessary
- The board will review impact assessment findings of completed CSR projects
- The board will be responsible for developing an Annual Action Plan for CSR at the beginning of each financial year.
- The board will be responsible for reviewing potential implementing partners & their project ideas.
- The Board will be supported by the CSR working group in all its responsibilities listed above.

### THEMATIC FOCUS AREAS

All its projects are aligned to its Global CSR priority areas which focuses on:

- Connecting the Unconnected
- Defending our climate
- Women Empowerment.

The Company may also take up other CSR projects from time to time, which align with Schedule VII of the Companies Act and contribute towards the Sustainable Development goals as per identified needs of the community and in response to humanitarian situations.

## GUIDING PRINCIPLES FOR SELECTION OF PARTNERS

The following principles shall be adhered to during the process of selecting implementation partners for CSR projects -

- The implementation partner organization should be registered as a Section 8 (not-for-profit) company, Trust, Society or any other organization allowed to implement CSR projects as per applicable regulations under Section 135 of the Companies Act 2013 (including any further applicable amendments)
- The implementation partner organization should have registered itself with the Central Government by filing form CSR-1 electronically with the Registrar as per timelines mandated by applicable regulations
- The partner organization should meet the following criteria -
  - The organization should be compliant with applicable legal and statutory requirements
  - The organization should have relevant experience in the proposed project's thematic area
  - Having prior experience of working in the same geographic area as proposed project is preferable
  - The organization should have adequate systems and processes for project planning, execution, monitoring, reporting and review. Further, documented systems and processes should also be there for internal organizational management. The Board may commission a review of the organization's systems and processes prior to partnering with them for CSR project execution

## GUIDING PRINCIPLES FOR SELECTION OF PROJECTS

The guiding principles for selection of projects will include the following -

- The proposed projects should be in line with Nokia's Global thematic focus areas of Connecting the Unconnected, Empowering Women and Defending our Climate.
- A need for the intervention should be established prior to undertaking the project.
- The project should contribute to the global Sustainable Development Goals
- The project should be in line with the thematic areas outlined in Schedule VII of the Companies Act.
- The company may also take up projects to support communities during natural disasters, pandemics and other humanitarian crisis situations.

## GUIDING PRINCIPLES FOR FORMULATION OF THE ANNUAL ACTION PLAN

An annual action plan will be designed by the company for structuring the CSR activities and implementation.

The annual action plan should include both ongoing projects from previous years and new projects to be taken up in the current year.

The Annual Action Plan should define the following aspects of every project –

- Objective of the project
- Key activities, Locations, Implementation schedule & Fund disbursement schedule
- Manner of execution of the project (direct implementation / through implementation partner)
- Mechanism for monitoring and reporting of project progress
- Details of needs assessment & impact assessment

The annual action plan should include expected administrative and other expenditure beyond direct project expenditure

## IMPLEMENTATION AND MONITORING OF ACTIVITIES

### **Implementation-**

The company will implement CSR projects in partnership with implementing organizations having expertise in executing such projects. Such organizations will be selected based on the guiding principles mentioned in this document.

The company may engage third party organizations to help with designing, planning and executing the projects.

### **Monitoring**

The CSR working group will review the projects on a quarterly basis. The company may engage third party organizations for concurrent monitoring of projects. Monitoring activities will comprise of desk-based monitoring as well as field visits.

The Board shall monitor the progress of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

## POLICY REVIEW

The Board of Directors will review the policy during the Board Meetings on CSR and make amendments only if there are any changes related to The Companies Act, 2013 or Members as required.

Approved by:

Board, Comptel Communications India Pvt Ltd