

<b>Policy Title</b>	Corporate Social Responsibility Policy (“ <b>CSR Policy</b> ”)
<b>Entity</b>	Vikas Telecom Private Limited (“ <b>Company</b> ”)
<b>Responsibility for Compliance</b>	Compliance Officer of the Company

<b>Applicability</b>	<p>The CSR Policy is applicable to the Company.</p> <p>The CSR Policy has been developed in consonance with Section 135 of the Companies Act, 2013 and in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended (“<b>CSR Rules</b>”), made thereunder.</p> <p>The CSR Policy shall apply to all Corporate Social Responsibility (“<b>CSR</b>”) activities undertaken by the Company in India as per Schedule VII to the Companies Act, 2013 (“<b>CSR Activities</b>”).</p>
<b>Background and Purpose</b>	<p>The Company is a Special Purpose Vehicle (“<b>SPV</b>”) of Embassy REIT. The Corporate Social Responsibility Committee of Embassy Office Parks Management Services Private Limited (“<b>Manager</b>”), Manager to Embassy REIT, oversees and monitors the CSR activities of all the SPVs of Embassy REIT including of the Company. This enables the CSR activities to have a wider reach and be more effective.</p> <p>Company’s Philosophy:</p> <p>This CSR Policy encompasses the philosophy for social responsibilities and lays down the guidelines and mechanism for undertaking projects, programs and activities beyond business which include initiatives and endeavors for the benefit and development of the community and society. The CSR Policy lays down guidelines for undertaking programs geared towards social welfare activities or initiatives. Through this CSR Policy, we propose to adopt the CSR activities mentioned below:</p> <p>(a) In alignment with the above vision, the Company through the CSR activities, will endeavor to enhance value creation in the society and in the community, through its services, conduct and initiatives, so as to promote sustained growth for the society and community, in fulfillment of its role as a socially responsible corporate.</p> <p>(b) The objective of this CSR Policy is to:</p> <ol style="list-style-type: none"> <li>(i) Outline projects, programs and activities to be undertaken by the Company;</li> <li>(ii) Specify the modalities of execution of such projects, programs and activities;</li> <li>(iii) Monitor the process to be followed for such projects, programs and activities;</li> <li>(iv) Directly or indirectly take up programs that benefit the communities in and around its work centers and results, over a period of time, in enhancing the quality of life and economic well-being of the local populace; and</li> </ol>

	(v) Generate community goodwill for the Company and help reinforce a positive and socially responsible image, through our CSR activities.
<b>Responsibility of the Board of Directors</b>	<p>(a) The Board of Directors of the Company will be responsible for constitution of the CSR Committee.</p> <p>(b) The quorum for a meeting of the CSR Committee would be two members. The meetings shall be held at the registered office of the Company or at such place as may be agreed to by the members of the CSR Committee.</p> <p>(c) Changes to the membership of the CSR Committee, and any modification or variation to the powers and the functions of the CSR Committee will require the approval of the Board.</p> <p>(d) The Board shall be responsible for sanctioning the CSR expenditure of the Company (“<b>CSR Expenditure</b>”) and to ensure that the amount of CSR Expenditure is available for implementing the CSR Policy.</p> <p>(e) Approving the CSR action plan and budget as proposed by the CSR Committee.</p> <p>(f) If the Company fails to spend the amount, reasons for not spending to be specified in the annual report of the Company.</p> <p>(g) The Board shall satisfy itself that the funds disbursed for CSR activities have been utilized for the purposes and in the manner as approved by it. The Chief Financial Officer of the Manager or the person responsible for financial management will be required to certify it to the effect.</p> <p>(h) In case of an ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and will be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.</p>
<b>Responsibility of the Committee</b>	<p>The CSR Committee shall be responsible for monitoring the CSR Policy from time to time. The CSR Committee shall approve and recommend to the Board, the projects or programmes to be undertaken, the modalities of execution and implementation schedule from time to time.</p> <p>Apart from recommending and approving budgets for project implementation, the CSR Committee will also institute a monitoring mechanism to track the progress of each project. The CSR Committee shall report it to the Board.</p> <p>The CSR Committee should be governed by the Companies Act, 2013 and the CSR Regulations, the CSR Rules, regulations etc., by whatever name called.</p> <p>The CSR Committee shall recommend the amount of CSR Expenditure in a year to be spent in accordance with the Companies Act, 2013 and the CSR Rules. For this purpose, the Board shall ensure that a designated officer of the Company will provide the relevant finance data and such other necessary details to the CSR Committee.</p> <p>The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of the CSR Policy and such plan shall include relevant details as specified under law from time to time.</p>
<b>General</b>	(a) Any surplus arising out of the CSR projects/ programs or activities shall be

<p><b>Responsibilities</b></p>	<p>ploughed back into the same project or shall be transferred to an unspent CSR account and be spent in accordance with the applicable law.</p> <p>(b) All administrative expenses, including expenditure on wages and salaries, tours and travels, and training and development of personnel deputed on CSR activities would be borne from CSR funds. However, the expenditure on administrative overheads shall not exceed 5% of total CSR expenditure of the company for the financial year.</p> <p>(c) If it is observed that any CSR Activity taken up for implementation is found not properly implemented, the CSR Committee may, with approval of the Board, discontinue funding the project at any time during the course of implementation and use such funds for any other project.</p> <p>(d) The CSR Committee shall have the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this CSR Policy.</p> <p>(e) The CSR Committee shall undertake impact assessment, through an independent agency if the thresholds provided under the applicable law are met and the impact assessment reports so prepared shall be placed before the Board and shall be annexed to the annual report on CSR.</p>
<p><b>Projects, Programmes and Activities</b></p>	<p>(a) The Company has identified the following focus areas of intervention:</p> <p>(i) Supplementing and improving the quality of education in government/ government aided/ under-served schools;</p> <p>(ii) Building infrastructure for government/ government aided/ under-served schools;</p> <p>(iii) Healthcare including preventive healthcare facilities;</p> <p>(iv) Sustainable infrastructure for the society;</p> <p>(v) Slum area development and rural development projects;</p> <p>(vi) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;</p> <p>(vii) Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;</p> <p>(viii) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, 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 the river Ganga;</p> <p>(ix) Protection of national heritage, art and culture including restoration of</p>

	<p>buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;</p> <p>(x) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;</p> <p>(xi) Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;</p> <p>(xii) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government; and</p> <p>(xiii) Measures for the benefit of armed forces veterans, war widows and their dependents</p> <p>(b) The criteria for selecting schools/ areas where the CSR activities will be carried will, <i>inter-alia</i>, comprise of the following:</p> <p>(i) The school should be a government/ government aided/ under-served schools.</p> <p>(ii) Readiness on the part of the school management, local authorities and the community to accept and give their full support.</p> <p>(iii) Healthcare is to be targeted towards the needy individuals.</p> <p>(c) The CSR Committee may also approach external consultants for necessary assistance as it may deem fit at such costs as may be approved by the Board.</p> <p>(d) The CSR Committee shall undertake sufficient due diligence of each of the CSR Activity before it is recommended.</p> <p>(e) Based on the recommendations of the CSR Committee, the Board shall approve the following:</p> <p>(i) The specific CSR activities that should be undertaken from time to time;</p> <p>(ii) The amount of the CSR Expenditure on each of the CSR Activity; and</p> <p>(iii) Whether the CSR activities will be undertaken directly or through an implementing agency or in collaboration with any other entities as specified under law from time to time and record reasons for the same.</p> <p>(f) Activities undertaken in pursuance of the normal course of the Company business shall not be considered towards CSR Expenditure.</p> <p>(g) All CSR projects must be aligned as prescribed in Schedule VII to the Companies Act, 2013.</p> <p>(h) Projects or programmes or activities that benefit only the employees of the Company and their families shall not be considered as CSR.</p> <p>(i) Contribution of any amount directly or indirectly to any political party shall not</p>
--	---

	be considered as CSR.
<b>CSR Expenditure and Allocation</b>	<p>(a) Tax treatment of CSR spent will be in accordance with Income Tax Act, 1961 as notified by Central Board of Direct Taxes.</p> <p>(b) The Board shall approve the allocation of the CSR Expenditure on the CSR activities and, to the extent possible, shall give priority to the local areas wherever the Company has its operations.</p>
<b>Implementation</b>	<p>(a) The Board along with the CSR Committee shall be responsible for implementation of this CSR Policy.</p> <p>(b) The Company may undertake the CSR activities either itself or through other qualifying entities as specified under law from time to time. The projects, programs or activities identified by the CSR Committee and approved by the Board shall be implemented in a project mode which will entail charting the stages of execution through planned processes, measurable targets, mobilization and allocation of budgets and prescribed timelines. It also involves assigning of responsibility and accountability. Suitable documents/ agreements shall be entered into with entities for the purposes of implementation of the CSR Activity, in case the CSR Activity is proposed to be implemented through the third party agencies. The conditions of grant of amounts for all CSR activities and the break-up of the allocations shall be set out and evaluated from time to time.</p> <p>(c) To the extent feasible, a project based accountability approach to stress on the long term sustainability of CSR activities shall be adopted, and the indicative action plan and implementation schedule (timelines) for the projects, programs and activities shall be adopted.</p>
<b>Monitoring Mechanism</b>	<p>(a) To ensure effective implementation of the CSR projects, programs and activities undertaken in terms of this CSR Policy, the progress of each such project, programme and activity will be reported to the CSR Committee periodically, with all requisite documentation.</p> <p>(b) Update on CSR implementation shall be submitted to the Board by the CSR Committee, periodically.</p> <p>(c) The CSR Committee will conduct impact studies on a periodic basis, through independent professional third parties/ professional institutions.</p> <p>(d) The CSR Committee shall also try to obtain feedback from the beneficiaries of the CSR projects, programs and activities. If considered necessary, the Company may procure the evaluation of the effectiveness of the various programs/ activities undertaken under the CSR Policy through external agencies for providing the required feedback and inputs to formulate and improve the programs in future.</p>
<b>Impact Assessment</b>	<p>(a) Regular and interactive feedback sessions shall be conducted at all levels including with other entities through which CSR activities are being undertaken as well as the respective beneficiaries of all the CSR activities undertaken by the Company.</p> <p>(b) Field visits shall be conducted at regular intervals to ensure effective</p>

	<p>implementation.</p> <p>(c) Proper documentation shall be done in a Management Information System (“MIS”) format to record key observations of such feedback sessions and field-visits.</p> <p>(d) If deemed necessary by the CSR Committee, the effectiveness of the various programs/ activities undertaken under the CSR Policy may be evaluated through external agencies and reports shall be prepared pursuant to such evaluation.</p>
<b>Record Keeping</b>	<p>(a) The CSR Committee shall maintain proper minutes of all its meetings.</p> <p>(b) The CSR Committee shall prepare an annual report on CSR with such information and particulars as may be required under law and such report shall be included in the Board’s report annexed to the financial statements.</p> <p>(c) The annual report of the Company shall include an annual report on CSR containing such details as may be prescribed from time to time under law.</p> <p>(d) The Board will be responsible to ensure that the statutory requirements as may be prescribed from time to time under law are complied with.</p>
<b>Amendments</b>	<p>The CSR Committee is empowered to amend or modify the CSR Policy and such changes shall be placed before the Board for its approval. The Board may subject to compliance with applicable law, at any time approve or alter, amend or modify the CSR Policy, as it deems fit to comply with the statutory obligation to undertake the CSR activities.</p>