

CORPORATE SOCIAL RESPONSIBILITY POLICY OF ORTEL
COMMUNICATIONS LTD (ORTEL)

1. Preamble:

As a part of our commitment towards Good Corporate Governance and trying for Good Corporate citizenship, Ortel always believes in pursuing in overall socio-economic objectives by way of contributing in the improvement of quality of life of the people in the communities, preferably in the local areas around our business operation.

In Ortel, we believe, there can be better transformation in the human life and environment by way of providing better and quality education and Ortel is committing with the endeavour of extending helping hand to the people in the communities who are in bare need of education and change. Ortel through its flagship CSR initiative Trust Known As "Ortel Dayitwa" provides financial support to girl children for college education with a noble objective of encouraging girls to pursue higher education after secondary education so as to enable them to stand in the society with dignity and honour.

Even though Provisions of Companies Act was not applicable to Ortel, but Ortel was voluntarily active in the various Corporate Social Responsibility (CSR) Activities since long back as a part of its good corporate governance practice and social belief.

While pursuing CSR activity, we will strategically integrate our social responsibility towards achieving long term value creation of all the stake holders including society at large and shall always continue to respect the interest of key stakeholders, especially those are socially and economically underprivileged in the local communities.

Ortel will primarily support the CSR activities permitted under Companies Act, 2013 and Rules made there under either directly or through Ortel Dayitwa Trust.

However, if required, it may also undertake CSR activities through any other entity/ organisation or through associates in compliance with the Provisions of applicable laws.

2. Commitment:

While being a responsible corporate citizen, Ortel is committed to run the business in the best transparent and ethical manner in compliance with all the applicable laws and regulations, it is unconditionally committed to meet highest expectation of all stakeholders and more particularly the following as per Schedule;

- i) Increasing customer satisfaction by providing better and quality service.
- ii) Ensuring healthy working environment to all the employees and business associates and also to take all possible measures ensuring better health and safety.
- iii) Pursuing good corporate governance practice and playing leadership role in the industry by creating value and providing quality service.
- iv) Implementing sustainable and long term social development programmes for the wellbeing of community at large
- v) Ensure better communications and performance through inclusive growth and social up bring.

3. Focus area:

The areas where Ortel will undertake CSR activities as specified under Schedule VII of the Companies Act, 2013 are:

- (i) eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- (ii) promotion of education including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- (iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;

- (v) protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- (viii) 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;
- (ix) contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government; (x) rural development projects.

4. Modalities for implementation of Policy:

The policy will be implemented by contributing directly by Ortel and also through its CSR Trust “Ortel Dayitwa” as per the decision of CSR Committee from time to time. However, Ortel may also implement its objectives by contributing or supporting or working in partnership with other associate or outside agencies or organisations.

CSR Policy implementation shall be periodically reviewed and monitored by two tiered governance comprising of (i) CSR Committee of the Board and (ii) CSR Steering Cell subject to direction of CSR Committee.

5. Monitoring:

CSR steering cell (“Steering Cell”) should be constituted headed by President & CEO who will guide and monitor progress of all CSR activities, Head of Corporate Affairs and Head of HR. A status report on the same shall be reviewed by CSR Committee on a timely manner.

Steering cell shall review and ensure timely implementation of the projects/ activities recommended by Committee and approved by Board from time to time.

6. CSR Committee:

The Board of Directors shall constitute / reconstitute the CSR Committee from time to time in compliance with statutory requirements. The CSR Committee shall comprise of minimum of three directors, at least one of whom, shall be Independent Director. The Committee shall ensure that the activities as are included in CSR Policy are undertaken by the Company.

The CSR Committee may invite members of senior management, trustees of Ortel Dayitwa Trust or any other persons as it deems necessary to the committee meetings. Committee shall;

1. Shall devise the CSR policy to be implemented by the Company from time to time.
2. Shall decide the types of activities to be undertaken within the purview of CSR Policy of the Company from time to time.
3. Shall review and ensure that, the activities included in the CSR policy are undertaken by the Company.
4. Shall devise, recommend, review and implement such other matter as the Committee deems fit from time to time in due compliance of the CSR requirement.

7. Corpus:

The corpus to be spent by Ortel either directly or otherwise shall be at least 2% of the average net profit of Ortel for preceding three financial years. Board shall approve on recommendation of CSR Committee, the overall limit to be spent for CSR activities.

CSR Committee shall approve individual project/ program and limit.

8. Validity:

The Policy shall be effective from the date of approval by Board and may be amended by Board from time to time.

9. Disclosure:

The policy shall be disclosed in the Directors' Report and shall also be placed on Company's website.

10. Board or Committee shall modify or amend the policy as and it is required both in compliance of law and in the interest of stake holders.

