

# **CORPORATE SOCIAL RESPONSIBILITY POLICY**

Applies To		atacom Limited and its d Subsidiaries
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### INTRODUCTION

Hathway Cable and Datacom Limited (Hathway) is one of the India's leading Cable Broadband service provider. It also provides Cable Television services through its wholly owned subsidiary — Hathway Digital Limited, which is one of the largest Multisystem Operator. Hathway vision is to be a single point access provider, bringing into the home and work place a converged world of information, entertainment and services

Hathway is vigilant in its enforcement towards corporate principles and is committed towards sustainable development and inclusive growth. The Company constantly strives to ensure strong corporate culture which emphasizes on integrating Corporate Social Responsibility (CSR) values with business objective. It also pursues initiatives related to quality management, environment preservation and social awareness.

### **SCOPE**

This policy is applicable to Hathway and its Subsidiaries. The following are the key elements of the policy:

- Vision and framework of Corporate Social Responsibility and its approach towards the same.
- Key focus areas for engagement and our Goals
- Overview of the implementation strategy of various CSR initiatives
- Governance Structure
- Funding, Selection and Monitoring Process

### CORPORATE SOCIAL RESPONSIBILITY PHILOSOPHY

Hathway subscribes to the philosophy of compassionate care and committed to act on the ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. Further the Company strives towards becoming a socially responsible corporate entity with a thrust on Community development, and education through sustained business conduct.

Hathway seeks to attain its CSR objectives in a professional and integrated manner, the Company has formulated policies for social development that are based on the following guiding principles:

- Adopting an approach that aims at achieving a greater balance between social development and economic development;
- Adopting new measures to accelerate and ensure the basic needs of all people including working towards elimination of barriers for the social inclusion of disadvantaged groups;
- Focusing on educating the girl child and the underprivileged by providing appropriate infrastructure, and groom them as future value creators;



- Assisting in skill development by providing direction and technical expertise to the vulnerable thereby empowering them towards a dignified life;
- Promoting an inclusive work culture;
- Working towards generating awareness for creating public infrastructure that is barrier free, inclusive and enabling for all including the elderly and the disabled;
- Promoting the well being and development of employees and their families through an inspiring corporate culture that encourages good values;
- motivating employees of the Company to spend time volunteering on issues pertaining to CSR;
- Responding to emergency situations & disasters by providing timely help to affected victims and their families.

### **FOCUS AREAS OF ENGAGEMENT**

In accordance with the requirements under the Companies Act, 2013, Hathway, CSR activities, amongst others, will focus on:

**HUNGER, POVERTY, MALNUTRITION AND HEALTH**: Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.

**EDUCATION**: Promoting education, including special education and employment-enhancing vocational skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies.

**RURAL DEVELOPMENT PROJECTS:** Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.

**GENDER EQUALITY AND EMPOWERMENT OF WOMEN:** Promoting gender equality and empowering women; setting up homes, hostels and day care centers for women and orphans; setting up old age homes and such other facilities for senior citizens; and adopting measures for reducing inequalities faced by socially and economically backward groups.

**ENVIRONMENTAL SUSTAINABILITY:** Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water.

**NATIONAL HERITAGE, ART AND CULTURE:** Protecting national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promoting and developing traditional arts and handicrafts.

## **GOALS**

Our goals include the following:

SI.NO	Goal Area	Actions
1.	Hunger, poverty, malnutrition	Hathway will work with its Group Company
		Foundation or trust or other Entity to improve



	and healthcare	livelihoods, addressing poverty, hunger and malnutrition and accessibility of quality healthcare and bring about improvement in awareness and health seeking behavior in various parts of India, enabling a better living, Key Initiatives includes  Improving food security and enhancing nutrition;  Supporting poverty and malnutrition projects, promote preventive healthcare and sanitation, safe drinking water;  Primary, secondary and tertiary care facilities;  Conducting need-based health camps and providing consultation, medicines etc.  Working on maternal and child health.
2.	Education	<ul> <li>Hathway will focus to work on several educational initiatives to provide quality education, training, skill enhancement, Key Initiatives include</li> <li>Promoting primary and secondary education;</li> <li>Promoting higher education including setting up and supporting universities;</li> <li>Enabling higher education through merit cum means scholarships, including for differently abled across the country.</li> <li>Skill development and vocational training.</li> </ul>
3.	Rural Development	We believe that the well-being of people living in rural areas ensures sustainable development. We will work with local administrations to achieve Community development goals. We will partner with governments and NGOs and support them in improving infrastructure such as constructing roads, providing drainage systems and electricity, and rehabilitating natural-disaster affected victims in rural areas.
4.	Gender equality, environmental sustainability, art and Culture	Hathway will among other things, focus on promoting gender equality and empowering women, ensuring environmental sustainability, ecological balance, protection of flora and fauna



		and protection of national heritage, art and culture including restoration of buildings and sites of historical importance.
5.	Other Initiatives	To undertake other need-based initiatives in compliance with Schedule VII of the Companies Act, 2013.

### **IMPLEMENTATION OF CSR ACTIVITIES**

Hathway will undertake its CSR activities, approved by the CSR Committee through

- a) Directly or through a registered trust, society or Company established by Hathway or its Holding, Subsidiary or Associate, Promoter Group Company under section 8 of the Companies Act, 2013;
- b) Any other Foundations, trusts, or a Section 8 company (or erstwhile Section 25 company) or any other form of entity with a track record of at least three years in carrying out activities in related areas. While engaging with partners, Hathway to evaluate the credentials of the implementing entity and seek relevant documents, information and details as per Annexure 1;
- c) Hathway may also collaborate with other Companies or Institutions for undertaking projects or programs for CSR activities.

## **GOVERNANCE**

## **Corporate Social Responsibility (CSR Committee)**

- a) Hathway's Board of Directors have formed a CSR Committee in accordance with the requirements of the Companies Act, 2013 and Rules made thereunder. This Committee is responsible for formulating CSR Policy and the decision making with respect to Hathway CSR policy.
- b) CSR Committee recommended the policy to Hathway's Board of Directors and the Board of Directors have approved this policy.
- c) The CSR Committee to meet at least once a year to review the implementation of CSR projects/ programs, monitor and give suitable direction.

## **Budget**

- a) The Board of Hathway to ensure that minimum of 2% of average net profit of the three preceding years is spent on CSR initiatives undertaken by Hathway;
- b) All expenditure towards the programs to be diligently documented;
- c) In case at least 2% of average net profit of the three preceding years is not spent in a financial year, reasons for the same to be specified in the CSR report;
- d) Any surplus generated out of the CSR activities not to be added to the normal business profits of Hathway.



## **FUNDING, SELECTION AND MONITORING PROCESS**

Hathway will receive requests for funding of projects throughout the year. Its panel of experts or Managing Directors or Chief Executive Officer along with Human Resources Head will evaluate proposals received, the focus areas and projects will be prioritized by assessing their impact. Hathway will then forward its recommendations to the CSR Committee.

The CSR Committee will deliberate on the proposals and approve the proposals for implementation at its discretion. Hathway representatives and/or its Group Company Foundation or such other entity will collaborate with stakeholders to monitor the status of each project and will report its findings to the CSR Committee periodically and an Annual Report to the Board of Directors.

## **EFFECTIVE DATE**

This policy is effective from 17<sup>th</sup> July, 2020.



### Annexure-1

## Indicative list of aspects to be considered while engaging with other entities

- 1. Due diligence of the implementing agency would be conducted to check the credentials of the organization. The following information from the interested implementing agencies would be sought, as relevant:
  - i. Memorandum/Article of Association or Constitution;
  - ii. Registration Certificate;
  - iii. Registration Certificate under Section 12A;
  - iv. Audited Accounts of last three years;
  - v. IT Exemption Certificate under Section 80G; (Lifetime validity)
  - vi. Pan Card:
- vii. IT Exemption Certificate under Section 35(i), if available;
- viii. Acknowledgement of Income Tax Return along with IT Return filed (last three
- ix. years)
- x. FCRA Certificate (if any) and latest copy of FCRA Return FC-3, if available;
- xi. Description of the project.
- 2. Ensure that the project/ programme is consistent with list of activities in Schedule VII.
- 3. The team may visit and/or meet the representatives to assess the organization (as required).
- 4. Quarterly reporting on the progress in implementation of the projects/ programmes and utilization of the amounts.
- 5. Reserving the rights, to be exercised at its sole discretion, of stopping the funding at any stage of the project, if the program is not being implemented as per program objectives and goals.