



**STL NETWORKS LIMITED**  
**Corporate Social Responsibility Policy**

**OWNER:**

Secretarial Department

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CSR Policy – 1.0

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## OUR AMBITION

To contribute to our vision, as we build India's connectivity and grow as a business, we, STL Networks Limited ('SNL'), will set the bar for what responsible, transparent, clean, and green business means in India. We will ensure that the newly connected India we create will benefit everyone, enabling truly inclusive development.

The UN's Sustainable Development Goals and 10 principles of the UN Global Compact Network have a strong influence on how we plan and implement our Corporate Social Responsibility ("CSR") and Sustainability initiatives. This approach has not only enabled us to operate responsibly, but also allowed us to focus on sustaining our triple bottom line impact through "green-clean-lean" technologies.

Our ambition is based on four pillars that are most important to us and through which we deliver shared value.

- Our community – Delivering life-changing services and technologies, empowering our communities and creating a better future;
- Our environment – Developing system-wide approaches that shall reduce SNL's eco-footprint with economic returns in the long-run;
- Our people – Ensuring that our people are healthy, safe, engaged and inspired to drive inclusive, equitable growth; and
- Our conduct – Creating sustainable practices, policies and business models that shall support growth of our business and communities.

## OBJECTIVE OF THIS POLICY

This Policy has been formulated pursuant to Section 135 of the Companies Act 2013 ("the Act") and in accordance with the Companies (Corporate Social Responsibility) Rules, 2014 ("CSR Rules") made thereunder, as amended from time to time (the Act & the CSR Rules together hereinafter referred to as 'CSR Laws') as guidelines to implement our Corporate Social Responsibility ('CSR') and Sustainability initiatives. This Policy shall apply to all CSR projects/programs undertaken by SNL in accordance with the CSR Laws.

## OUR FOCUS AREAS

We implement our CSR initiatives in accordance with the CSR Laws and ensure that we go beyond compliance to benefit our communities in the most sustainable manner. CSR is an essential part of our business plan and we consider it our responsibility to address the concerns of our communities. We leverage our expertise in connectivity to provide innovative and unique solutions to pressing social and environmental challenges in our focus areas.

Specific areas as per Schedule VII of the Act have been selected for conducting our CSR work. Each of these are closely linked to India's development priorities as well as the United Nation's Sustainable Development Goals.

SNL's four focus areas are –

- Education
- Healthcare
- Women Empowerment
- Environment Conservation

## **IMPLEMENTATION AND MONITORING**

We spend, in every financial year as and when applicable, such amounts towards CSR activities as prescribed under Schedule VII of the Act.

Just as we strive for efficiency in our business operations, we also ensure that CSR at SNL follows a well-defined and structured approach to make it effective, impactful and create maximum shared value for each of our stakeholders.

Our approach can be summarized in the following points:

- a) All major CSR initiatives (eg. programs) for SNL may be implemented through Sterlite Tech Foundation (STF), a non-profit trust, either directly, through a third party or a combination of the two modalities. It shall be ensured that the implementation meets the requirements provided under the CSR Laws.
- b) SNL shall identify projects within the core focus areas that address the needs of communities and provide quality interventions that are efficient, cost effective, scalable, and sustainable.

We believe that good CSR is that which can be effectively measured. We measure the outcomes and impact of all our CSR initiatives by putting in place a robust monitoring and evaluation mechanism that focuses on collecting information on a regular basis and allow us to assess if the initiatives are providing intended outcomes.

Our role shall be that of a proactive enabler and partner, which entails mapping the needs of the community and acting upon it in collaboration with the community, State / Central government and NGOs.

We believe that we can only be socially responsible as a company if our employees are responsible at an individual level. We shall therefore ensure that our employees experience our CSR initiatives through meaningful engagement.

## **GOVERNANCE**

Board of Directors and Sustainability and Corporate Social Responsibility Committee - A Sustainability and Corporate Social Responsibility Committee (the 'Committee') has been constituted in accordance with the Act. It shall comprise of three or more Directors, amongst whom at least one shall be an Independent Director or such number of members as is mandatorily required by the CSR Laws.

The committee shall be accountable to the Board of Directors ('Board') of SNL and shall discharge such roles

and responsibilities as prescribed under the CSR Laws. The Board may also assign additional functions and responsibilities to the Committee from time to time.

Implementation of this policy will be monitored and reviewed periodically through a two tier structure comprising: Sustainability and Corporate Social Responsibility Committee of the Board and the Internal team.

The Board shall perform all the functions as detailed under the CSR Laws.

### **Annual Action Plan**

The Committee shall formulate and recommend to the Board, an Annual Action Plan ('AAP') in pursuance of this Policy and in accordance with the CSR Laws, which shall include focus areas for the year, the list of projects to be undertaken, manner of execution, budget, fund utilization, monitoring mechanism and details of impact assessment, if any. The Board of Directors may approve the AAP with such conditions as it deems fit and further alter AAP at any time during the financial year, as per the recommendation of the Committee, based on the reasonable justification to that effect.

### **Impact Assessment**

The CSR Committee may also undertake a study to assess the impact caused by the CSR activities of the Company. For the said purpose, the CSR Committee may designate special executives or avail the services of specialized agencies. It shall mandatorily undertake impact assessment, through an independent agency, for CSR projects or activities having outlays of such amount as may be prescribed under the CSR Laws.

### **Utilization of funds**

The Board shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall issue a certificate to the Board every year certifying that the funds disbursed are utilised for the purpose and in the manner as approved by the Board.. It shall be ensured that the administrative overheads are not more than 5% of the total CSR Expenditure.

Any surplus arising out of the CSR activities shall not form part of the business profit of the company. Such surplus, any unspent CSR amount and any amount spend in excess of the CSR obligations in a financial year, shall be dealt with in accordance with the CSR Laws.

In case of an ongoing project, the Board shall monitor its implementation with reference to the approved timelines and year-wise allocation and shall make modifications, if any, for its smooth implementation within the overall permissible time period

## **DISCLOSURES**

Appropriate disclosures of the CSR Policy, CSR Committee, annual CSR activities, executing partners, and CSR expenditure entailed shall be made available on the website in accordance with the CSR Laws, if any. CSR initiatives shall also be reported in the Annual Report of the Company in the prescribed format. It shall be the responsibility of the CSR team to ensure the information disseminated is accurate.



**REVIEW AND AMENDMENT OF THE POLICY**

The Board may, either on its own or as per the recommendations of CSR Committee, amend this Policy, as and when required.

Words and expressions used but not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, the CSR Rules made thereunder or in any amendment(s) thereto.

In case of any amendment(s), clarification(s), circular(s), FAQs, etc. are issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), FAQs, etc.

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