



CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Introduction:

Hathway Digital Limited understands its responsibility towards the society in which it operates and is initiating small but significant steps in bringing positive changes in the environment for sustainable development taking into consideration the interests of various stakeholders. With the rapidly changing corporate environment, more functional autonomy, operational freedom etc., the Company has adopted CSR Policy as a strategic tool for sustainable growth. For the Company in the present context, CSR policy adopted by the Company is not just a tool of investment of funds for Social Activity but is also an effort to integrate Business processes with Social processes. The Policy has been approved by the Board of Directors of the company pursuant to the meeting of the Board of Directors dated 7th June, 2019 and shall be effective from the date of approval from the Board of Directors.

2. CSR Vision & Value:

Hathway Digital Limited 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.

3. CSR Mission:

The Company subscribes to the philosophy of compassionate care and committed to act on an 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. This is the cornerstone of CSR policy of the Company.

4. CSR Charter:

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.
- ◆ Strive for economic development that positively impacts the society at large with minimal resource footprint.
- ◆ Embrace responsibility for the Company's actions and encourage a positive impact through its activities on hunger, poverty, malnutrition, environment, communities, stakeholders and the society

5. CSR Framework for the operational aspect:

- Stakeholder involvement (Community, Employees, Customer, relevant Agencies and Civil Society)
- Transparency and reporting

6. Our Core Focus Areas:

- Community Development
- Education

7. CSR Activities:

The Company shall undertake the activities as recommended by the CSR Committee and



approved by the Board in accordance with the provisions of Section 135 of the Companies Act, 2013 read with Schedule VII and Companies (CSR Policy) Rules, 2014 and any amendment thereof.

8. Composition of CSR Committee

The CSR Committee is comprised in accordance with the requirements of the Companies Act, 2013 and the relevant rules made thereunder.

9. CSR Policy:

8.1 Objective:

The policy document is an attempt to articulate the Company's Social Responsibility. The framework enables to put in place policies and practices in line with this policy. The social policy document is an attempt to showcase the linkage of our social objectives with business strategy. The Company will act as a good Corporate Citizen.

8.2 The CSR Approach:

8.2.1 The approach is to interweave social responsibility into the Company's mainstream business functions through translating commitments into policies, which not only drive all employees but influence and mobilize to embrace responsible business practices in their respective spheres of action. The policy affirms business objectives and strategy along with our commitment to augment the growth and development of employees, the communities we operate in, and our investors.

8.3 Community Development:

The community is an integral part of the business environment. Business intervention can have a positive or negative effect on a community. The need assessment and engagement process is critical to the system and demands focus on a case-to-case basis, which includes setting up strong ties with the community. Factors that affect the local community could range from education, health and hygiene, to displacement, livelihood and environmental concerns. There could be a combination of some of these factors or all of them. Reach and penetration could be enhanced by roping in agencies working in the area. The objective is to augment overall economic and social development of local communities by discharging our social responsibilities in a sustainable manner.



8.4 Education:

Education is the basic tool to bring development to an area and its population. We aim to create an aware pool of human resource both within and across our area of operations. We are committed to bridging the digital divide between the 'haves' and the 'have nots'. A sustainable education model could be strengthened through partnership with relevant local agencies. The CSR gamut is covered by these broad areas but not limited to them.

8.5 Gender equality, environmental sustainability, art and Culture:

We aim to 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.

10. Going beyond policy imperatives:

Although our main thrust lies in providing support to the above mentioned areas, the Company shall not restrict itself to it. In order to improvise on areas of interest and business, to develop and integrate business models with social and environmental priorities and processes in order to create shared value.

11. Activities, setting measurable targets with timeframes and performance management:

Prior to the commencement of projects, there shall be a baseline study of the core focus areas and subsequent development of a project for satisfying the core focus areas. All the projects shall be assessed under the agreed strategy, shall be monitored every quarter, and measured against targets and budgets.

12. Budget and Implementation:

The Budget shall be arrived at on computation of:

- a. two percent of the average net profits made during the three immediately preceding financial years calculated in accordance with the provisions of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014;
- b. any income arising there from; and
- c. surplus arising out of CSR activities



Thereafter, a specific budget shall be allocated to a specific project activity. The CSR Committee constituted shall monitor the project expenditure and the surplus arising out of the CSR activity will not be part of business profits of the Company.

13. Information dissemination

Information on the spending by the Company shall be disseminated on periodic basis in its Annual Report.

Conclusion

The above guidelines would form the framework around which the CSR activities would be undertaken. The Board will review the policy from time to time based on changing needs and aspirations of the target beneficiaries and make suitable modifications, as may be necessary.