

**CORPORATE SOCIAL
RESPONSIBILITY POLICY**

DEN NETWORKS LIMITED

1. CONCEPT

1.1. SHORT TITLE & APPLICABILITY

- This policy, which encompasses the company's philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large, is titled as the '**CSR Policy**'.
- This policy shall apply to all CSR initiatives and activities taken up at the various offices of the Company, for the benefit of the society a key stakeholder of the company.
- This policy and the operational guidelines issued herein are subject to and pursuant to the provisions of the Companies Act, 2013 ("The Act") and the rules and regulations made thereunder.

1.2. CSR OBJECTIVE, VISION & MISSION STATEMENT

The Company's Objective

The DEN Networks Limited believes in Principles of "*Serving Society through Industry*". It aims to achieve, consolidate and strengthen good corporate including socially and environmentally responsible business practices that balance financial profit with social well being.

The Company's CSR Vision

Our vision is to actively contribute to the social and economic development of the communities in which we operate. In so doing build a better, sustainable way of life for the weaker sections of society and raise the country's human development index

The Company's CSR Mission

Our Mission is to provide best cable and internet distribution services to subscribers of the Company at competitive prices and sub-serve the interest of the shareholders and work for progress and development of the society.

Implementation of CSR Initiatives

The Board of a company may decide to undertake its CSR activities approved by the CSR Committee, through a registered Trust or a registered society or a company established under section 8 of the Act by the Company, either singly or alongwith its holding or subsidiary or associate company, or alongwith any other company or holding or subsidiary or associate company of such other company, or otherwise:

Provided that---

- (i) if such trust, society or company is not established by the company either singly or alongwith its holding or subsidiary or associate company, or alongwith any other company or holding or subsidiary or associate company of such other company, it shall have an established track record of three years in undertaking similar program activities;
- (ii) the company has specified the project or programs to be undertaken through these entities, the modalities of utilization of funds on such projects and programs and the monitoring and reporting mechanism.

The Company may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner as mentioned in CSR rules.

1.3. CSR COMMITTEE

The Board of Directors of the Company will constitute a CSR Committee. The Committee shall:-

- ❖ comprise at least three directors including one independent director;
- ❖ adopt this CSR policy and monitor its implementation and the programmes there under;
- ❖ meet at such intervals as may be required or expedient including once at the end of the financial year;
- ❖ approve and adopt the CSR report for publication in the annual report of the company;
- ❖ do such other things and acts as may be required for the implementation of the policy, matters connected therewith or incidental thereto;

2. RESOURCES

The Budget shall be arrived at on computation of:

- a. two percent of the average net profits 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
- d. CSR expenditure shall include all expenditure including contribution to corpus, the projects or programs relating to CSR activities approved by the Board on the recommendation of the CSR committee of the company, but does not include any expenditure on an activity not in conformity or not in line with activities which fall within the purview of CSR activities of the company.

3. Role of the CSR Committee:

The role of the CSR Committee is as follow as:

1. Recommend to Board Corporate Social Responsibility Policy
2. Recommend the amount of Expenditure incurred on activities in CSR policy
3. Monitor CSR policy from time to time
4. Ensure that in every Financial Year company spend at least 2% of average net profit made immediately preceding three Financial Year
5. Inform the Board about any additional activities to be undertaken by the Company not listed in CSR Activities

4. Focus Areas of Engagement

There are several opportunities to increase and deepen social impact at scale and generate value for all. DEN seeks to strategically consolidate the company's CSR initiatives to focus on discrete social problems, all aimed at *enabling lives, living and livelihoods*. Owing to its long tradition of social responsibility, the value of sustainable social impact at scale is instilled across the conglomerate.

Rural Transformation	Creating sustainable livelihood solutions, addressing poverty, hunger and malnutrition
Health	Affordable solutions for healthcare through improved access, awareness and health seeking behavior
Education	Environmental sustainability, ecological balance, conservation of natural resources
Arts, Heritage and Culture	Protection and promotion of India's art, culture and heritage
Environment	Environmental sustainability, ecological balance, conservation of natural resources
Disaster Response	Managing and responding to disaster
Promotion of Sports	Training to promote rural sports, nationally recognized sports, Paralympics sports, Olympic sports and promote sports at gross root level
Community Development	Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes etc.,
Other Initiatives	To undertake other need based initiatives in compliance with Schedule VII of the Companies Act, 2013

The Company has identified following focus areas:

❖ Rural Transformation

To work towards bridging the developmental gap between rural 'Bharat' and urban India by improving livelihood, addressing poverty, hunger and malnutrition. Key initiatives include:

- a) Supporting Farm and non-farm livelihoods
- b) Improving water conservation and rain-water harvesting
- c) Developing community based initiatives like VFAs and producer companies towards building capacity of the community and ensuring sustainability.

- d) Using technology towards delivering need based information for improving quality of life.
- e) Improving food security and enhancing nutrition
- f) Developing Community infrastructure

❖ **Healthcare**

To address issues around affordability and accessibility of quality healthcare and bring about improvement in awareness and health seeking behavior in various parts of India, enabling a better living, through initiatives such as:

- a) Primary, secondary and tertiary care facilities
- b) Conducting need based health camps and providing consultation, medicines etc.
- c) Working on maternal and child health
- d) Behavioral change for improved mother and child health
- e) Improving healthcare delivery through innovative outreach programmes
- f) Working for the visually impaired
- g) Working in the areas of Communicable and non-communicable diseases
- h) Using technology for training, competency evaluation and clinical decision support for medical professionals with a view to improve quality of healthcare

❖ **Education**

To work on several educational initiatives to provide quality education, training, skill enhancement for *improving* the quality of *living* and *livelihood*. Initiatives are aimed at:

- a) Promoting primary and secondary education
- b) Enabling higher education through merit cum means scholarships, including for differently abled across the country.
- c) Using sports as a tool for development of students in both urban and rural settings
- d) Promoting higher education including setting up and supporting universities
- e) Skill development and vocational training

❖ **Environment**

To enable enhanced livelihood and quality of life, promote environment sustainability through various initiatives for:

- a) Ecological sustainability
- b) Promoting biodiversity
- c) Conservation of natural resources
- d) Maintaining quality of soil, air and water
- e) Promoting renewable energy
- f) Developing gardens and river fronts

❖ **Protection of national heritage, art and culture**

To work towards preserving the rich heritage, arts and culture of India for its future generation and make conscious efforts to ensure its continuity and enhance avenues for livelihoods of traditional artisans and craftsmen. Key initiatives include:

- a) Working towards protecting and promoting India's art, culture and heritage through various promotional and developmental projects and programmes.
- b) Support and promotion of artists and craftsman
- c) Promotion and preservation of traditional art and handicraft
- d) Documenting India's rich heritage for the benefit of future generations

❖ **Disaster Response**

To strengthen efforts in the area of Disaster Response towards establishing DEN as one of the leading organizations with the capacity to respond in a timely and impactful manner in the affected areas. Key initiatives include:

- a) Building capacities of local communities to respond to disasters
- b) Developing expertise and resources to respond to disaster

❖ **Promotion of Sports**

Training to promote rural sports, nationally recognized sports, Paralympics sports, Olympic sports and promote sports at gross root level.

❖ **Community Development**

Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes etc.,

❖ **Other Initiatives**

To undertake other need based initiatives in compliance with Schedule VII of the Companies Act, 2013.

5. BASELINE SURVEY & DOCUMENTATION

CSR committee will carry out a baseline study of the place where the Company would be undertaking its CSR activities. All activities are assessed under the agreed strategy, and are monitored time to time. Wherever necessary, midcourse corrections are affected. Provided that the CSR Committee shall give preference to the local area and areas around it where it operates, for spending the amount embarked for Corporate Social Responsibility Activities.

The Company may undertake any additional activities not listed above (paragraph 4), subject to approval of CSR Committee and the Board of Directors of the Company.

6. MONITORING & FEEDBACK

- To ensure effective implementation of the CSR programmes undertaken, the progress of CSR programmes under implementation will be reported to CSR committee on a half-yearly basis.

- Appropriate documentation of the CSR Policy, annual CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis and the same will be available in the public domain. These will also be subject to audit as required by law.
- CSR initiatives of the Company will also be reported in the Annual Report of the Company and filed with the relevant statutory authorities as required by law.

7. INFORMATION DISSEMINATION

Information on the spending by the Company shall be disseminated on periodic basis on web-site of the Company and Annual Report as required in Companies Act, 2013 and Listing Agreement.

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Corporate Social Responsibility policy of the Company conforms to the Schedule VII of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 as notified by the Ministry of Corporate Affairs, Government of India).

Conclusion

In India the role of business has almost never been exclusively about wealth creation. Rather, there is a rich tradition of businesses contributing to social welfare, something that may stem from religious roots or from a very socialistic understanding of business purpose. It may be said that the outlook for CSR in the country looks positive, with several stakeholders stepping up to take action. As for those who are already active, there is a slow but sure movement towards a more holistic and strategic understanding of what CSR really means. India will, it seems, continue to evolve unique and innovative models of CSR in response to its challenges. Not only corporate, but individuals too, as personal wealth increases, will contribute more to social development, and the overall ethos of giving will be synergistic between individuals and organizations.

The emerging legislation is bound to push reluctant actors and is already introducing some innovative elements. Thus, all in all, it seems that both corporate CSR and personal philanthropy in India are only going to increase.

The Company 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.

For enquiries related to the DEN Networks Limited CSR initiatives, please contact:

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