CORPORATE SOCIAL RESPONSIBILITY POLICY

MOBILE COMMUNICATIONS (INDIA) PRIVATE LIMITED

CIN: U74899DL1992PTC048236

Registered Office:

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A. PREAMBLE

Corporate Social Responsibility (CSR) represents the commitment of **MOBILE COMMUNICATIONS (INDIA) PRIVATE LIMITED** (hereinafter referred to as **'MCIPL'** or **'the Company'**) to conduct business in a manner that is socially responsible, environmentally sustainable, transparent and ethical. The Company recognizes its duty towards society and is committed to contribute meaningfully to the social and economic development of India.

This Corporate Social Responsibility Policy (hereinafter referred to as 'CSR Policy' or 'Policy') has been formulated in accordance with the provisions of Section 135 of the Companies Act, 2013 (hereinafter referred to as **"the Act"**) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time (hereinafter referred to as **"CSR Rules''**).

B. POLICY STATEMENT

At MCIPL, we believe that Corporate Social Responsibility is an integral part of our Company's ethos and one of our core business principles. As a responsible corporate citizen engaged in trading of wireless communication equipment. The company sells on behalf of Motorola as well as does its direct sales after procuring equipment from Motorola and other suppliers. The Company also undertakes commissioning and installation, servicing and handling and repair of the wireless network and systems, we are committed to leveraging our expertise and resources to address critical social needs and contribute to the holistic development of communities.

The Company takes pride in implementing CSR activities that address key developmental challenges, both in the communities where we operate and in society at large. Our CSR activities are strategically aligned with the Sustainable Development Goals (SDGs) established by the United Nations, and we strive to influence micro and macro level development indicators in our target geographies.

C. PHILOSOPHY AND APPROACH

The Company's CSR philosophy is grounded in the principles of humanity, dignity, sustainability, and inclusive development. We believe in creating social impact through hands-on execution of well-planned initiatives that deliver measurable outcomes.

Our approach to CSR is guided by the following principles:

- **Community-Centric Focus**: Identifying and addressing genuine needs of communities through continuous engagement and participatory planning.
- **Technical Excellence**: Leveraging our core competencies in infrastructure, urban planning, and capacity building to design and implement innovative CSR interventions.
- **Sustainability**: Prioritizing long-term, sustainable solutions that continue to deliver benefits even after project completion.

- **Partnership Approach**: Collaborating with government bodies, NGOs, academic institutions, and local communities to maximize reach and impact.
- **Employee Engagement**: Encouraging employee volunteerism and participation to build a culture of giving back to society.
- **Transparency and Accountability**: Maintaining highest standards of transparency in fund utilization, project implementation, and impact reporting.
- **Alignment with National Goals**: Contributing to India's developmental priorities and the United Nations Sustainable Development Goals.

D. CSR SCOPE AND OBJECTIVES

The Company may undertake CSR activities from any of the areas specified in Schedule VII to the Companies Act, 2013, as may be amended from time to time. The CSR objectives of MCIPL India encompass, but are not limited to:

1. Eradicating hunger, poverty and malnutrition; promoting healthcare including preventive healthcare and sanitation, including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation; and making available safe drinking water

2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled; and livelihood enhancement projects

3. 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

4. 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, including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga

5. 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

6. Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows

7. Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports

8. Contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, Scheduled Tribes, other backward classes, minorities and women

9. Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and contributions to public funded Universities, Indian Institutes of Technology (IITs), National Laboratories and autonomous bodies engaged in research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs)

10. Rural development projects

11. Slum area development

12. Disaster management, including relief, rehabilitation and reconstruction activities

E. CSR GOVERNANCE STRUCTURE

The Board of Directors of MCIPL shall constitute a Corporate Social Responsibility Committee (hereinafter referred to as 'CSR Committee') in accordance with the provisions of Section 135(1) of the Companies Act, 2013 and CSR Rules, when the Company meets the threshold criteria specified under the Act.

If the Company's CSR obligation does not exceed Rupees Fifty Lakhs in a financial year, the requirement for constitution of a separate CSR Committee shall not be applicable, and the functions of the CSR Committee shall be discharged by the Board of Directors of the Company.

F. CSR COMMITTEE COMPOSITION AND RESPONSIBILITIES

Composition:

As and when the provisions concerning constitution of CSR Committee becomes applicable, the CSR Committee shall consist of at least two directors, as per the Act. Unlike other companies, a private company is not required to have an independent director on its CSR committee.

Responsibilities of the CSR Committee:

The CSR Committee shall be responsible for:

- Formulating and recommending to the Board of Directors of MCIPL, a Corporate Social Responsibility Policy, which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Act;
- Reviewing the CSR Policy from time to time and recommending amendments as necessary;
- Providing strategic direction to CSR initiatives and ensuring alignment with the Company's core competencies and community needs;
- Formulating and recommending to the Board of Directors, an Annual Action Plan for CSR activities to be undertaken, including execution modalities, implementation schedules, monitoring mechanisms, and timelines;

- Recommending the amount of expenditure to be incurred on various CSR activities, ensuring compliance with Section 135(5) of the Act;
- Identifying CSR projects as 'Ongoing Projects' or 'Other than Ongoing Projects' in accordance with CSR Rules;
- Monitoring the implementation and progress of CSR activities and reporting to the Board periodically;
- Ensuring that CSR activities align with the activities specified in Schedule VII of the Act;
- Evaluating and approving partnerships with implementing agencies, NGOs, government organizations, and other entities for executing CSR projects;
- Recommending appointment of independent agencies for conducting impact assessment studies, where applicable;
- Reviewing impact assessment reports and ensuring learnings are incorporated into future CSR planning;
- Ensuring that administrative expenses relating to CSR activities do not exceed the limits prescribed under the CSR Rules;
- Deciding on the manner of utilization of any surplus arising out of CSR projects;
- Ensuring transparency and accountability in CSR fund utilization and project implementation;
- Undertaking all actions as may be prescribed under the Act, CSR Rules, and any other applicable regulations.

Responsibilities of the Board of Directors:

The Board of Directors shall:

- Consider and approve the CSR Policy recommended by the CSR Committee
- Consider and approve the Annual Action Plan for CSR activities as recommended by the CSR Committee
- Disclose the contents of the CSR Policy in the Board's Report and place it on the Company's website
- Ensure that the Company spends the prescribed amount on CSR activities as per Section 135(5) of the Act
- Ensure that CSR activities are undertaken in accordance with the approved CSR Policy
- Monitor the implementation of CSR initiatives based on periodic reports from the CSR Committee
- Ensure compliance with all applicable provisions of the Act and CSR Rules
- Approve any amendments to the CSR Policy as recommended by the CSR Committee
- In case of ongoing project, the Board of a Company shall:
    - ✓ approve a project as a multi-year on-going project, i.e., extend the duration beyond one year, based on reasonable justification,
    - ✓ monitor the implementation of the project with reference to the approved timelines and year-wise allocation,
    - ✓ shall make modifications, if required, for smooth implementation of the project within the overall permissible time period.

G. IMPLEMENTATION FRAMEWORK

Manner of Implementation:

The Company may undertake CSR activities through any of the following modes:

1. Directly by the Company through its own teams and resources;

2. Through a company established under Section 8 of the Act, or a registered public trust or registered society, registered under Section 12A and 80G of the Income Tax Act, 1961, established by the Company, either singly or along with any other company;

3. Through a company established under Section 8 of the Act or a registered trust or registered society, established by the Central Government or State Government, or any entity established under an Act of Parliament or State legislature;

4. Through a company established under Section 8 of the Act, or a registered public trust or registered society, registered under Section 12A and 80G of the Income Tax Act, 1961, having an established track record of at least three years in undertaking similar activities;

5. In collaboration with other companies, including group companies, under Group CSR initiatives, for pooling resources and achieving greater impact;

6. In partnership with local governance bodies such as Gram Panchayats, Municipal Corporations, and other civil bodies to directly undertake approved CSR projects;

7. Through partnerships with reputed Non-Governmental Organizations (NGOs), academic institutions, research organizations, and other civil society organizations with expertise in relevant sectors.

8. Direct contribution to the prime minister's national relief fund [or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women

Selection of Implementing Partners:

The Company shall ensure due diligence in selecting implementing partners for CSR projects. The selection criteria shall include:

- Relevant expertise and experience in the proposed area of intervention;
- Financial stability and transparency in operations;
- Track record and credibility of the organization;
- Registration under Section 12A and 80G of Income Tax Act, 1961, where applicable;

- Compliance with applicable legal and regulatory requirements;
- Alignment with the Company's CSR objectives and focus areas.

Capital Assets Created Through CSR Projects:

Capital assets acquired or created through CSR projects shall be held by:

- Beneficiaries of the CSR project in the form of self-help groups, collectives, or entities; OR
- A company established under Section 8 of the Act, or a registered public trust or registered society having charitable objects and CSR registration number; OR
- A public authority or local government body

The Company shall take appropriate measures to ensure that such assets are utilized for the purpose for which they were created and shall not be transferred or disposed of without prior permission of the Company.

H. ANNUAL ACTION PLAN

The CSR Committee, once applicable, shall formulate and recommend to the Board an Annual Action Plan for CSR activities to be undertaken during the financial year. The Board shall consider and approve the Annual Action Plan.

The Board shall formulate an Annual Action Plan in pursuance of this CSR Policy.

Guiding Principles for Formulation: The Annual Action Plan shall be developed based on the following guiding principles:

- **Need-Based Assessment:** Priority shall be given to projects that address documented community needs.
- **Resource Optimization:** Ensuring maximum impact per rupee spent.
- **Measurability:** Every activity must have defined milestones and reporting timelines.
- **Compliance:** Ensuring all activities fall strictly within the ambit of Schedule VII of the Act.

The said Annual Action Plan shall include:

1. List of CSR projects or programs to be undertaken;
2. Manner of execution of each project (directly or through implementing agencies);
3. Implementation schedule and timelines;
4. Modalities of utilization of funds for each project;
5. Monitoring and reporting mechanism;
6. Details of need and impact assessment, if any, for the proposed projects;

7. Identification of projects as 'Ongoing Projects' or 'Other than Ongoing Projects'.

The Board may alter the Annual Action Plan at any time during the financial year, as per the recommendation of the CSR Committee, based on reasonable justification.

I. CSR EXPENDITURE AND BUDGET ALLOCATION

CSR Spending Obligation:

The Company shall spend, in every financial year, at least two percent (2%) of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of its CSR Policy.

If the Company has not completed three financial years since its incorporation, the CSR spending obligation shall be calculated based on the average net profits made during the immediately preceding financial years.

The computation of 'net profit' for CSR purposes shall be in accordance with the provisions of Section 198 of the Companies Act, 2013.

Administrative Expenses:

The Company shall not spend more than five percent (5%) of the total CSR expenditure in any financial year on administrative expenses relating to the general management and administration of CSR activities, as per the CSR Rules.

Unspent CSR Amount:

If the Company fails to spend the prescribed CSR amount in any financial year, the unspent amount shall be dealt with as follows, subject to the provisions of Section 135 of the Act:

1. In case of Ongoing Projects: The unspent CSR amount shall be transferred to an 'Unspent CSR Account' within 30 days of the end of the financial year. The amount shall be spent during the next three financial years from the date of such transfer. If not utilized within three years, the amount shall be transferred to a Fund specified in Schedule VII of the Act, within 30 days of completion of the third financial year.
2. In case of Other than Ongoing Projects: The unspent amount shall be transferred to a Fund specified in Schedule VII of the Act, within six months of the expiry of the financial year.

Excess CSR Spending:

If any amount is spent in excess of the requirement prescribed under Section 135(5) of the Act in any financial year, such excess amount may be set off against the CSR spending obligation for the three immediately succeeding financial years, subject to approval of the Board and compliance with conditions laid down under the Act and CSR Rules.

Surplus from CSR Projects:

Any surplus arising out of CSR projects or programs shall not form part of the business profits of the Company and shall be ploughed back into the same project or utilized for other CSR activities in accordance with the CSR Policy and CSR Rules.

J. MONITORING, REVIEW AND IMPACT ASSESSMENT

Monitoring Mechanism:

The CSR Committee once applicable, shall be responsible for ongoing monitoring and maintaining a transparent reporting mechanism to ensure effective implementation of CSR projects, programs, and activities. The monitoring shall be done through:

- Program planning and review meetings
- Implementation plans and schedules with defined milestones
- Periodic progress reports from implementing agencies
- Field visits and on-site inspections
- Baseline surveys and situational assessments
- Stakeholder feedback and beneficiary consultations
- Financial audits and compliance checks
- Any other appropriate monitoring tools and mechanisms

Fund Utilization:

The Board shall ensure that the funds disbursed for undertaking CSR activities have been utilized for the purposes and in the manner as approved by it. The Company shall maintain proper documentation and records of all CSR expenditures, including invoices, receipts, and utilization certificates from implementing partners.

Impact Assessment:

The Company shall undertake impact assessment through an independent agency for CSR projects that meet the threshold criteria specified under the CSR Rules i.e. companies having CSR obligation of Rupees 10 Crore or more in the immediately three preceding financial years. Currently, impact assessment is mandatory for CSR projects having outlays of Rupees One Crores or more and which have been completed not less than one year before undertaking the impact study.

The impact assessment report shall be placed before the Board of Directors and the CSR Committee and shall be annexed to the Annual Report on CSR. The Company may also voluntarily undertake impact assessment for other projects to measure effectiveness and incorporate learnings into future CSR planning.

The cost of impact assessment shall not exceed two percent (2%) of the total CSR expenditure for the financial year or Rupees Fifty Lakhs, whichever is higher, and shall be included within the overall CSR budget.

K. REPORTING AND DISCLOSURE

Board's Report:

The Board's Report shall include an Annual Report on CSR activities containing the following information:

1. Brief outline of the Company's CSR Policy, including overview of projects or programs undertaken
2. Composition of the CSR Committee
3. Average net profit of the Company as per Section 198 for the last three financial years
4. Prescribed CSR expenditure
5. Details of CSR amount spent during the financial year
6. Amount unspent, if any, and reasons for not spending
7. Details of Ongoing Projects and Other than Ongoing Projects
8. Manner in which the amount spent during the financial year is detailed in the prescribed format
9. Details of impact assessment, if applicable
10. Details of unspent CSR amount transferred to specified funds or Unspent CSR Account
11. Any other information as prescribed under the CSR Rules

Website Disclosure:

The Company shall display the following information on its website:

- Composition of the CSR Committee
- CSR Policy of the Company
- CSR projects approved by the Board
- Any other information as may be prescribed under the Act and CSR Rules

Transparency and Accountability:

The Company is committed to maintaining the highest standards of transparency and accountability in its CSR activities. All CSR expenditures and project details shall be properly documented, and regular disclosures shall be made to stakeholders as per applicable regulations.

L. MISCELLANEOUS PROVISIONS

1. Exclusions from CSR:

The following shall not be considered as CSR activities subject to the provisions of the Act and CSR Rules:

a) Activities undertaken in pursuance of normal course of business of the Company
b) Activities undertaken outside India
c) Projects or programs benefiting only the employees of the Company and their families
d) Contribution of any amount directly or indirectly to any political party
e) Activities supported by the Company on sponsorship basis for deriving marketing benefits
f) Activities carried out for fulfillment of any other statutory obligations under any law in force in India.
g) Contribution and involvement of employees in CSR activities of the company will no doubt generate interest / pride in CSR work and promote transformation from Corporate Social Responsibility (CSR) as an obligation to Socially Responsible Corporate (SRC) in all aspects of their functioning. The Company encourage to involve their employees in CSR activities. However monetization of pro bono services of employees would not be counted towards CSR expenditure. [General Circular No. 1/2016 dated 12th January, 2016].
h) CSR activities should be undertaken by the companies in project/ programme mode [as referred in Rule 4 (1) of Companies CSR Rules, 2014]. One-off events such as marathons/ awards/ charitable contribution/ advertisement/ sponsorships of TV Programmes etc. would not be qualified as part of CSR expenditure. General Circular No. 21/201418th June, 2014.
i) Expenses incurred by companies for the fulfillment of any Act/ Statute of regulations (such as Labour Laws, Land Acquisition Act etc.) would not count as CSR expenditure under the Companies Act. [General Circular No. 21/2014 18th June, 2014- also covered in rules].

2. Contributions to Specified Funds:

The Company may, at its discretion and as recommended by the CSR Committee, make contributions to the Prime Minister's National Relief Fund, PM CARES Fund, Swach Bharat Kosh, Clean Ganga Fund, or any other fund set up by the Central Government or State Government for specified purposes under Schedule VII of the Act.

3. Collaboration and Partnerships:

The Company encourages building partnerships with government organizations, non-governmental organizations, academic institutions, other companies, and civil society organizations to maximize impact, share best practices, and leverage collective expertise and resources.

4. Documentation and Record Keeping:

The Company shall maintain proper books of accounts, records, and documents in relation to CSR activities, including financial transactions, project reports, and beneficiary data, as per applicable legal requirements.

5. Compliance of Prevailing Law:

While undertaking Corporate Social Responsibility activities under provision of the Companies Act, 2013, shall not contravene any other prevailing laws of the land including Cigarettes and Other Tobacco Products Act (COTPA), 2003. [General Circular No. 05/2016 dated 16th May, 2016].

M. AMENDMENTS TO THE POLICY

The Board of Directors may amend this Policy from time to time, based on the recommendations of the CSR Committee or on its own accord, to ensure alignment with applicable laws, regulations, and business requirements.

Any or all provisions of this Policy shall be subject to revision or amendment in accordance with the Rules, Regulations, Notifications, Circulars, or Guidelines issued by the Ministry of Corporate Affairs or any other relevant statutory authority, from time to time.

In case of any amendment(s), clarification(s), circular(s), etc. issued by relevant authorities not being consistent with the provisions laid down under this Policy, such amendment(s), clarification(s), circular(s), etc. shall prevail over the provisions of this Policy, from the effective date specified therein.

In case of any conflict between the provisions of this Policy and any other law for the time being in force, the provisions of Section 135 of the Act and the CSR Rules shall prevail.

POLICY APPROVAL

This Corporate Social Responsibility Policy has been formulated and approved by the Board of Directors for approval on February 25, 2026.

VERSION HISTORY

Version	Approved By	Approval Date
1.0	Board of Directors	February 25, 2026

Disclaimer: This CSR Policy is prepared based on the provisions of the Companies Act, 2013 and CSR Rules as applicable. Any changes in statutory provisions will automatically supersede the relevant clauses in this Policy.

For any queries or clarifications regarding this CSR Policy, please contact the Board of Directors at the registered office of the Company.