

Corporate Social Responsibility ('CSR') Policy

1. Preamble

This CSR policy has been approved by the Board of Directors of Nxtra Data Limited ("Nxtra") pursuant to the provisions of Section 135 of the Companies Act, 2013 with an objective to provide guidance and direction to undertake CSR initiatives in a more structured and unified manner.

2. Scope of CSR Activities

Nxtra's CSR and welfare activities will center on the following areas:

- I. Promoting education including special education, employment enhancing vocation skills especially among children and livelihood enhancement projects
- II. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- III. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government.
- IV. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.

However, the Company may, subject to the approval of the CSR Committee, undertake any CSR project specified in Schedule VII of the Companies Act, 2013 from time to time.

3. CSR Committee

The Board of Directors of the Company shall constitute / re-constitute the CSR Committee from time to time in compliance with statutory requirements. The CSR Committee shall comprise of directors in accordance with section 135 of Companies Act 2013 as amended from time to time.

4. Undertaking CSR Activities

Bharti Foundation is the philanthropic and developmental arm of the Bharti Group. Bharti Foundation currently runs 254 Schools to deliver free quality education to underprivileged children across rural pockets in India and lays special emphasis on education for the girl child.

Nxtra will primarily support the CSR activities, permitted under the Companies Act, 2013 and rules made thereunder, undertaken by the Bharti Foundation. However, if required, it may also undertake CSR activities through any other entity / organization in compliance with the provisions of applicable laws.

5. Selection and Implementation of CSR Activities and Projects

The CSR Committee shall consider CSR proposals from Bharti Foundation or through any other eligible entity. In order to be considered by the CSR Committee, such proposals must inter-alia contain details of projects / programs to be undertaken, proposed amount, timelines and a confirmation that such projects / programs are eligible under the Companies Act, 2013 and rules made thereunder.

The CSR Committee will evaluate the projects / programs and may, at its sole discretion, approve certain projects / programs for implementation. While approving projects / programs, the Committee shall ensure that those are covered under the ambit of activities listed in Clause 2 above.

The CSR Committee may also decide to contribute towards the Corpus Fund, as permitted under the law.

6. CSR Budget

The Board shall approve overall limits for CSR Activities to be undertaken by the Company. Within the overall limits approved by the Board, the CSR Committee shall approve individual projects / programs including contribution towards the Corpus Fund. Any surplus arising out of the CSR projects, programs or activities will not form part of the business profit of Nxta.

7. Location

All CSR projects / programs under this policy shall be undertaken in India. The CSR Committee shall decide on locations for implementation of the CSR projects / programs.

8. Monitoring and Disclosure

The CSR Committee shall endeavor to:

- Devise a robust monitoring mechanism to ensure that the CSR projects / programs are undertaken effectively in accordance with the approval granted and are fully in compliance with applicable laws, rules and regulations. Monitoring of CSR activities could be done through:
 - ✓ Periodic third party assessment of key projects
 - ✓ Impact assessment with key indicators in our areas of operations
 - ✓ Regular review by CSR committee
- Ensure that appropriate disclosures are made to the shareholders in the company's annual reports.

The Contents of the CSR Policy shall be disclosed in the Board's report and displayed at the Nxta Website.

9. Annual Action Plan

The CSR Committee shall formulate and recommend to the Board, an annual action plan which shall strive to contain the following items and which shall be amended from time to time, as the Board may think in consultation with the CSR Committee:

- a. the list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- b. the manner of execution of such projects or programs as specified in sub-rule (1) of rule 4;
- c. the modalities of utilisation of funds and implementation schedules for the projects or programs;
- d. monitoring and reporting mechanism for the projects or programs;
- e. details of need and impact assessment, if any, for the projects undertaken by the company; and

f. details of surplus arising out of the CSR activities

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect, as Board may deem fit.