

## TATA COMMUNICATIONS LIMITED

### CORPORATE SOCIAL RESPONSIBILITY POLICY

#### Purpose and scope

This Policy is prepared pursuant to the requirements of Section 135 of the Companies Act, 2013 (hereinafter referred to as 'the Act'), Schedule VII to the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 ('Rules') including any amendment(s) / modification(s) thereof. The scope of this Policy is to set out the guiding principles for selection, implementation and monitoring of Corporate Social Responsibility ('CSR') activities for Tata Communications Limited ('Company') and for formulation of the Annual Action Plan for CSR activities. This Policy shall guide the CSR programs conducted by Tata Communications Limited and its wholly owned direct and indirect subsidiaries (collectively referred to as 'Tata Communications') across India. Salient details of the CSR projects to be implemented by the Company, shall be published on the Company's website. This may be revised from year-to-year basis changes in projects. The Indian subsidiaries of Tata Communications Limited shall follow this Policy, subject to applicability on them under the Act and the Rules.

#### Vision

***An inclusive and connected society that advances the well-being of people and the planet.***

Recognising the systemic, global challenges of equitable resource distribution, social inequality, environmental degradation, and climate change, Tata Communications envisions a future that prioritizes both social and planetary well-being.

Through its focused strategy, Tata Communications' CSR programs aim to advance the well-being of people and the planet by emphasizing sustainable livelihoods and environmental conservation with Education being a key driver for all. This involves skill development, entrepreneurship, conservation of water, protection of biodiversity, and usage of renewable energy sources to mitigate carbon emissions. We shall achieve this through collaboration, partnerships, and sustainable practices.

#### Preamble

CSR at Tata Communications derives inspiration from Tata group's mission '*to improve the quality of life of the communities we serve globally through long term stakeholder value creation based on Leadership with Trust*'.

Tata Communications is committed to *deliver a New World of Communications™* which, creates social value. It is also committed to making a positive, tangible impact on the environment and society. Guided by this purpose and Tata group's philosophy, Tata Communications shall leverage its core expertise, partnerships, infrastructure and other resources to facilitate sustainable development and create long term shared value for the communities it serves, focussed primarily on underserved, socially and economically marginalized groups, including, but not limited to, women, children, youth, persons with disabilities, scheduled castes and scheduled tribes.

Complementing India's national priorities and policies which reflect the spirit of the UN Sustainable Development Goals (SDGs), all efforts at Tata Communications shall be aligned to complement action on the following 11 SDGs in accordance with our vision and ambition:

- SDG 1- End poverty in all its forms everywhere
- SDG 3- Ensure healthy lives and promote well-being for all at all ages.
- SDG 4- Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.
- SDG 5- Achieve gender equality and empower all women and girls.

- SDG 7: Affordable and Clean Energy: Ensure access to affordable, reliable, sustainable and modern energy for all.
- SDG 8- Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
- SDG 10 - Reduced Inequality: Reduce inequality within and among countries.
- SDG 13- Take urgent action to combat climate change and its impacts.
- SDG 14- Life Below Water: Conserve and sustainably use the oceans, seas, and marine resources for sustainable development.
- SDG 15 - Life on Land: Protect, restore, and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss.
- SDG 17- Strengthen the means of implementation and revitalise the global partnership for sustainable development.

### Key focus areas and driving principles.

Tata Communications is committed to conducting its CSR activities in a manner which is rooted in **ethics**, promotes **well-being**, and imparts **resilience**. Keeping the community at the centre of development while recognising its interconnectedness with natural environment, Tata Communications identifies **Sustainable Livelihoods, and Environment** as priority areas for its CSR work, with education, technology and wellbeing integral to our interventions.

- **Sustainable Livelihoods:** Empowering youth, persons with disabilities (PwDs) and rural communities (especially women) economically and socially through vocational, entrepreneurship and life skills training which enhance access to resources, new technology and financial services thereby supporting them in becoming active contributors to the economy.
- **Environment:** Integrating action on Climate Change, biodiversity, water, and energy into community initiatives and creating partnerships which promote environment restoration and regeneration

The CSR Program of Tata Communications shall integrate the disaster risk and reduction framework which is critical for protecting the developmental gains made by the projects. Tata Communications shall synergize with the programmes and initiatives of the Tata group wherever possible in a meaningful manner and provide humanitarian support for post-disaster relief and rehabilitation in close coordination with the Tata group. It shall also strive to create volunteering opportunities in accordance with Tata Communications' volunteering policy.

### Geographies

Tata Communications focus areas for developmental activities shall be in urban as well as rural areas across India, as approved by the CSR, Safety and Sustainability Committee of the Board, from time to time.

### Target Community

While we shall ensure that all communities benefit from our CSR activities, we shall focus on those groups that are socially and economically marginalized. These groups include women, girl child, persons with disabilities (PwDs) and scheduled castes and scheduled tribes. This is in accordance with the Tata Affirmative Action Programme (TAAP).

### Governance structure & management

The Board-appointed CSR, Safety and Sustainability Committee oversees the Company's societal obligations and its reputation as a responsible corporate citizen. The CSR, Safety and Sustainability Committee shall formulate and recommend a CSR Policy and an Annual Action Plan to the Board which shall, among other things, include the following:

- The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act
- The manner of execution of such projects or program
- The modalities of utilisation of funds and implementation schedules for the projects or programs
- Monitoring and reporting mechanism for the projects or programs
- Details of need and impact assessment, if any, for the projects undertaken by the company

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The Annual Action Plan may be altered by the Board of Directors of the Company ('Board') as per the recommendation of the CSR, Safety and Sustainability Committee at any time during a financial year to provide scope for mid-course correction basis reasonable justification.

Once the Annual Action Plan has been approved by the Board, necessary funds should be utilized directly or disbursed to implementing partners. The disbursed funds shall be utilised solely for the purposes and in a manner as approved by the Board. The Chief Financial Officer or the person in-charge of financial management shall be responsible for certifying to the Board, on an annual basis, that the funds disbursed have been utilised solely for the purposes and in the manner as approved by the Board.

### Reporting

Tata Communications believes transparent reporting on sustainability and CSR is a cornerstone of corporate citizenship. As a practice, Tata Communications shall publish disclosures (including details on fund utilisation, unspent funds, set off amounts and impact assessment of projects or programs) in Business Responsibility & Sustainability Report (BRSR) and in the Annual Report of the Company in accordance with the requirements of the relevant laws. The Company is also committed to make additional disclosures, as deemed necessary.

### Implementation

Tata Communications may implement its CSR activities through ongoing projects as prescribed under the Act and the Rules. The duration, including extensions, if any, for such projects shall be in accordance with the applicable Rules and as approved by the CSR Committee or the Board.

The implementation of the CSR programs approved by the Board in the aforementioned priority areas shall be carried out directly or in partnership with an implementing partner, with an established, impeccable track record in their respective domains and the highest sense of ethics and integrity, in accordance with the requirements of the Act and the Rules, post necessary due diligence.

The execution modalities with specific targets, outcome, activities, milestones and responsibilities of each party shall be incorporated in the MoU signed between Tata Communications and the implementing partner. As a practice, Tata Communications establishes long term multi-year partnerships, to provide ample time for creating an impact.

### Monitoring and evaluation of CSR projects

The CSR, Safety and Sustainability Committee shall monitor and review the progress of the Annual Action Plan and the execution modalities of CSR programs including the details relating to the time period / duration over which each particular program should be extended and depending upon the nature of the program, the extent of coverage and the intended impact of the program.

All projects undergo quarterly monitoring with a defined, project specific Monitoring and Evaluation framework. Monitoring is done through a cloud-based tool that enables implementing partner to upload real time data along with photographs and case studies. The tool facilitates last mile tracking and impact analysis. Additionally, regular interactions and site visits are conducted by the CSR team to assess the progress of the project and extend support, in terms of expertise, to the partner. The projects are appraised annually by the CSR team, to assess efficacy basis which, project engagements shall be reviewed for the consequent year and drawn in the Annual Action Plan for the approval of the CSR, Safety and Sustainability Committee and the Board.

Third party impact assessment is incorporated in project design and shall be undertaken for projects in accordance with the terms prescribed in the Rules. As a best practice, certain critical projects may also be included within the scope of the assessment. Details of such impact assessments should be presented to the CSR, Safety and Sustainability Committee / Board and disclosed in the Annual Report of the Company, as may be required in accordance with the Act and the Rule.



### Budget

The minimum funds allocated for CSR shall be as per the Act. This Policy provides that funds allocated for CSR activities in India should include at least 2% of the average net profits of the Company during three immediately preceding financial years (computed in accordance with the provisions of Section 198 of the Act read with the Rules). Should the Company's CSR spend in India exceed the requirements of Section 135 of the Act, the excess spend may be set off against the requirement to spend under Section 135 of the Act for up to three immediately succeeding financial years, subject to applicable provisions of the Act and the Rules.

Up to 5% of the total CSR expenditure of the Company in India in a given financial year, may be spent on general management and administration of CSR function in the Company. Expenditure towards impact assessment shall be in accordance with the prescribed Rules. Any surplus arising out of the CSR projects or programs or activities shall not form part of the business profits of the Company and shall either be ploughed back into the same project/program or transferred to the Unspent CSR account to be spent in alignment with this Policy and the Annual Action Plan of the Company or shall be applied in accordance with the provisions of the Act, Schedule VII and the Rules.

### Amendments to this Policy

This Policy shall be modified from time to time, to be compliant with any statutory requirements and/or operational changes. Such amendments to the Policy shall be carried out in consultation with the CSR, Safety and Sustainability Committee and the Board as and when required.

*The amendment in the CSR policy is approved by the Board of Directors on 22<sup>nd</sup> April 2025.*



**Amur S Lakshminarayanan**  
MD & CEO

Dated: 30 May 2025

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<sup>1</sup> Explanation on geography: Tata Communications recognises that being a leading global communications technology player, its sphere of influence extends beyond its immediate geographical presence. Thus, the selection of geographies for CSR projects shall be based on both, its business operations (aids in leveraging our infrastructure, network, resources and people) and 'Right thing to do'. The latter indicates Tata Communications intent to reach underserved communities in locations which are in dire need of social interventions, (including due to historical, geographical isolation) with low values on Human Development indicators (such as 'Aspirational Districts' identified by the Government of India).