

BRIGHTCOM GROUP LIMITED

(formerly, Lycos Internet Limited)

CSR POLICY

Corporate Social Responsibility Policy - Brightcom

Philosophy

Brightcom balances commerce and social responsibility in a way of giving to the world for a better place for 'You and for Me'. A brand like Brightcom that has defined itself and its core values, outlines social responsibility initiatives in alignment with its authentic brand story. In line with traditional financial metrics that businesses hold both compelling reasons to be responsible and perform better, Brightcom believes that social responsibility is a business imperative rather than anything else. For Brightcom, it makes good business sense not just to be socially responsible but to make a serious social mission intrinsic to our business. Towards this, respecting applicable laws and with the involvement of our global teams at large, we just don't stop with value creation for stakeholders but, help in activities like educating the poor within our limits etc. withholding our very purpose of business to social responsibility of simplifying the everyday life of people at large through our services.

CSR Policy:

Objectives

Brightcom CSR Policy intends to strive for the economic development that positively impact the society at large with minimum resource footprint.

Focus Areas

Brightcom CSR activities amongst others will focus on:

1. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the Swach 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 setup 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;
7. Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
8. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government.
10. Rural development projects.
11. Slum area development.
12. Any other items as may be prescribed from time to time, in Schedule VII of the Companies Act, 2013.

Implementation

The Company may implement the Company's CSR Programmes through Company personnel or through external implementing agencies or through any of the trust of the Company. If CSR Programmes are implemented through external agencies / Trusts, then the Company will specify the CSR Programmes which may be undertaken by those external agencies/Trusts.

CSR Expenditure

CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Plan. Moreover, any surplus arising from any CSR Programmes shall be used for CSR. Accordingly, any income arising from CSR Programmes will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.

Composition of CSR Committee

The CSR Committee shall consists of following directors:

1. Mr. M. Suresh Kumar Reddy
2. Mr. Vijay Kancharla
3. Dr. K. Jayalakshmi Kumari

Responsibility of CSR Committee.

The responsibilities of the CSR committee include:

1. Formulate and amend the Corporate Social Responsibility Policy (CSR Policy), from time to time.
2. Recommend the amount of expenditure to be incurred on the activities referred in CSR Policy.
3. Monitor the CSR Policy of the Company from time to time.

Governance

1. Every year, the CSR Committee will place for the Board's approval, a CSR Plan delineating the CSR Programmes to be carried out during the financial year and the specified budgets thereof. The Board will consider and approve the CSR Plan with any modification that may be deemed necessary.
2. The CSR Committee (CSC) will assign the task of implementation of the CSR Plan within specified budgets and timeframes to such persons or bodies as it may deem fit.
3. The persons/bodies to which the implementation is assigned will carry out such CSR Programmes as determined by the CMC within the specified budgets and timeframes and report back to the CSC on the progress thereon at such frequency as the CSC may direct.
4. The CSC shall review the implementation of the CSR Programmes once a quarter and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Programmes in accordance with this Policy.
5. Once every six months the CSC will provide a status update to the Board on the progress of implementation of the approved CSR Programmes.
6. At the end of every financial year, the CSR Committee will submit its report to the Board.