

CORPORATE SOCIAL RESPONSIBILITY POLICY
OF BHARTI REALTY LIMITED
(With effect from March 10, 2021)
*In accordance with Section 135 of the Companies Act 2013 and
the Companies (Corporate Social Responsibility Policy) Rules, 2014("the Act")*

BHARTI REALTY LIMITED

Regd. Office: Airtel Centre, Plot No. 16, Udyog Vihar, Phase-IV, Gurgaon, Haryana-122015

Version 2.0

1. Preamble

At Bharti Realty Limited, business success is not just about profits and shareholder returns. We believe in pursuing wider socio-economic and cultural objectives and have always endeavored to not just live up to it, but to try and exceed the expectations of the communities in which we operate.

Quality education is the most powerful tool for socio-economic transformation of a country. It not only eradicates poverty but also ensures equity among people. Therefore, Bharti Realty Limited's CSR and welfare activities will be committed to create and support programs that bring about sustainable changes through education and use of technology and ensure:

- Accessibility and quality of education for all, in particular for underprivileged children from disadvantaged and marginalized communities.
- Education and training opportunities to the youth of our country in order to make them employable.

2. Focus areas

Bharti Realty Limited's CSR and welfare activities will center around 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.

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 a minimum of three directors, at least one of whom, shall be an independent director.

The CSR Committee may invite members of senior management, representatives of Bharti Foundation and other persons as it deems necessary to the committee meetings.

The CSR Committee shall formulate and recommend to the Board of Directors, an annual action plan in pursuance of its CSR policy which includes (i) list of CSR projects to be undertaken (ii) the manner of execution of such projects (iii) utilization of funds and implementation schedule (iv) monitoring and reporting mechanism for the projects or programs; and (v) impact assessment, if any for the projects undertaken by the Company.

The Board may alter the annual action plan, at any time during the financial year, as per the recommendation of its CSR Committee, based on reasonable justification to that effect.

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.

Bharti Realty Limited 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 Activities to be undertaken by the Company under the Policy shall form part of annual action plan. 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.

The projects/ programs or activities to be chosen by the Company shall correspond to its CSR Policy as well as its annual action plan, as amended from time to time.

The excess amount incurred by the Company on CSR projects, programs or activities may be set off against the requirement to spend in succeeding financial year's in consonance with the applicable provisions.

7. CSR Expenditure

The Company may spend up to 5% of the total CSR expenditure in one financial year on administrative expenses relating to general management and administration of CSR functions in the Company.

The surplus arising out of the CSR activities will not be considered as a part of the business profits of the Company and shall be ploughed back into the same project, or shall be transferred to the unspent CSR account and it should be spent in pursuance of this CSR policy and annual action plan of the Company, or the Company may transfer such surplus amount to a Fund specified in Schedule VII of the Act, within a period of six months of the expiry of the financial year.

The unspent amount, if any other than unspent amount relating to an ongoing projects, will be transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the respective financial year.

The unspent CSR funds of ongoing projects will be transferred within a period of 30 days from the end of the respective financial year to a special account opened by the Company in any scheduled bank called the "Unspent Corporate Social Responsibility Account". Such amount shall be spent by the Company towards CSR within a period of 3 financial years from the date of such transfer, failing which, the

company shall transfer the same to a Fund specified in Schedule VII, within a period of 30 days from the date of completion of the third financial year.

8. 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.

9. 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 and the annual action plan (i.e. projects approved by the Board) shall be disclosed in the Board's report and displayed on the Company's website, if any.

10. Validity of CSR Policy

This policy is effective from March 10, 2021 and may be amended by the Board as required from time to time.

11. Contact

For any clarification / query related to CSR policy of the company, please contact:

Mr. Mridul Gupta

Company Secretary

Bharti Realty Limited

E-mail: Mridul.gupta@bharti.in.