



# Corporate Social Responsibility Policy

---

**AT&T Global Network Services India Private Limited**

**AT&T Communication Services India Private Limited**

**AT&T Global Business Services India Private Limited**

<b>Version</b>	<b>1.0</b>
<b>Authorized By</b>	CSR Committee



**Contents**

AT&T India CSR Vision & Policy.....2

Objectives.....2

Applicability.....2

Focus Areas.....3

Other Focus Areas.....5

Program Implementation, Governance and Monitoring Process.....5

Funding Guidelines.....5

Employee Engagement.....6

Contact.....6



## AT&T India CSR Vision & Policy

For **AT&T India**<sup>1</sup> (hereinafter “**AT&T**” or “**AT&T India**” or “**Company**”), Corporate Social Responsibility (hereinafter “**CSR**”) means responsible business practices and social stewardship through the involvement of all stakeholders in the decision making process and operations. It entails having business policies that are ethical, equitable, environmentally conscious, gender sensitive, and sensitive towards the differently-abled. AT&T is committed to creating a more equitable and inclusive society by supporting processes that lead to sustainable transformation and social integration, and that are compliant with the Company’s CSR obligations under the law, as applicable.

## Objectives

The objectives of **AT&T India CSR Policy** (hereinafter “**CSR Policy**” or “**Policy**”) are to:

- Demonstrate commitment, responsible business practices and good governance;
- Support social sector development that ensures sustainable change through vibrant and innovative partnerships with non-government and other social sector organizations (hereinafter “**Qualifying Organizations**” or “**Beneficiary Entities**”);
- Set benchmarks and specifications for high quality delivery of services in the social sector;
- Encourage and motivate AT&T employees to participate in its CSR obligation.

## Applicability

- AT&T’s CSR Policy is based on and shall comply with the requirements under the applicable law, including the Companies Act and rules notified there under.
- The projects and programs that AT&T will take up under its CSR Policy will meet the requirements set forth in the applicable law, including Schedule VII of the Companies Act.
- This Policy shall cover all AT&T entities in India<sup>1</sup>.

---

<sup>1</sup> This CSR Policy is applicable for all AT&T India entities - (i) AT&T Global Network Services India Pvt Ltd (ii) AT&T Communication Services India Pvt Ltd and (iii) AT&T Global Business Services India Pvt Ltd.



## Focus Areas

Currently the CSR Policy Focus Areas are:

### Education

Education is a game changer and important driver in creating an empowered, equitable and just society. AT&T is interested in improving the quality of education in India through school improvement programs, including high school retention programs (especially non-traditional, underserved low income groups) and college and workforce readiness programs (especially non-traditional, underserved and low income groups), capacity building of stakeholders and supplementary and vocational education programs.

AT&T understands the role of institutions of higher learning and is interested in promoting research and development and collaborating with renowned institutions to contribute towards the goal of high quality education systems, particularly technical education, in the country.

Persons with disability and women's empowerment are cross cutting themes in these focus areas.

AT&T supports:

- Programs that help students successfully complete high school and/or prepare for and gain access to college (especially girl child, non-traditional and underserved students) and programs that help students' successfully complete college (especially girl child, non-traditional and underserved students).
- Leadership development programs for individuals, especially underserved populations (women, racial and ethnic minorities, youth, etc.).
- Job training programs that prepare individuals, especially underserved populations (racial and ethnic minorities, low-income, etc.) for meaningful employment.
- Educational programs that develop community and civic leadership capacity.

### Community Development

Livelihood Enhancement, Employability & Skill Development

AT&T supports:

- Programs that provide small business with training in entrepreneurship, job creation, attraction, and retention.
- Programs that provide economic development opportunities in low-income areas, including community revitalization efforts, job training, etc.



- Programs of skill development of youth, minorities and women through developing their market-oriented skills and linking them to potential employers. This program seeks to benefit school drop-outs, people with disabilities, and those unable to go into higher education and seeks to promote diversity and inclusion.
- Initiatives that support and enhance the arts and cultural experience through education curriculum and other educational outreach and extensions (e.g. school outreach, audio casts, pod casts, etc.)

### **Health and Human Services**

AT&T supports:

- Initiatives that utilize telemedicine/ tele health to reach underserved and hard-to-serve populations, provide preventive healthcare and medical education, increase access to health specialists that use innovative and/or collaborative approaches to address key community health issues.
- Programs that enable people with disabilities to use cutting-edge technology and experience the many opportunities that modern communications and technology can enable for them.
- Programs that help eradicate extreme hunger and malnutrition.
- Programs that promote sanitation and safe drinking water.

### **Environment and Sustainability Solutions**

Environment conservation is an exciting and critical challenge, and we are working hard toward meeting it every day. Areas of focus include water management, energy management, transportation initiatives, device recycling and engaging our supply chain to effect even greater improvements in environmental performance.

AT&T supports programs, products and services that:

- enable the users to better manage and monitor resource consumption;
- provide sustainable ways to conserve natural resources and promote recycling efforts;
- reduce harmful impacts on the environment;
- use innovative Information and Communication Technology (ICT) solutions that give people and businesses the tools to be more energy efficient, reduce environmental impacts and address social challenges.



## **Other Focus Areas**

AT&T supports such other CSR activities that are permitted under the applicable law from time to time, including without limitation Schedule VII of the Companies Act, 2013.

## **Program Implementation, Governance and Monitoring Process**

The AT&T CSR Committee will deliberate on proposals and approve proposals for implementation at its discretion. The CSR Committees will ensure effective implementation of the CSR programs, projects and activities undertaken, and a monitoring mechanism will be put in place and run by the CSR Program Manager in consultation with the CSR Committees. The progress of CSR programs will be reported by the CSR Program Manager to the Committees on a semi-annual basis.

Funding grants will only be made after detailed due diligence, review and background check of the beneficiary entities, their organizational structure and management, past performance, track record and other bonafides. In addition to in-house diligence and checks, AT&T may also engage, at its discretion, outside parties that specialize in providing background checks on Beneficiary Entities / Qualifying Organizations.

The beneficiary entities will need to submit periodic reports of (i) the utilization of the funds given to them, and (ii) progress in the implementation of the programs, projects or activities for which funds were granted.

AT&T may undertake through its authorized representatives field visits of the beneficiary entities and the programs, project and activities undertaken by them pursuant to AT&T's fund disbursements to them. AT&T may also obtain feedback from direct end users or beneficiaries of the programs.

## **Funding Guidelines**

For achieving its CSR Objectives, AT&T will allocate the amount required under the applicable law as its budget for CSR programs, projects or activities ("CSR Budget" or "Budget").

Provisions will be made towards expenditures in one or more of the approved projects, programs and activities ("CSR Projects") on an ongoing basis pertaining to /falling within the Focus Areas set out above.

The utilization of the CSR Budget on the implementation of the CSR Projects, programs and activities undertaken by AT&T shall be in compliance with the applicable law, including the Companies Act, 2013, and the rules and notifications issued thereunder. It is hereby clarified that the CSR Projects undertaken pursuant to this Policy shall be based on project/ program



mode, or activities (either new or ongoing), excluding activities undertaken in pursuance of the Company's normal course of business activities. One-off events such as marathons/ awards/ charitable contribution/ advertisement/ sponsorships of television programs etc. would not be qualified as expenditure towards the CSR.

The surplus arising out of the CSR projects or programs or activities will not form a part of the business profits of the Company.

An organization that receives funding from AT&T must use the funding for the purpose noted in its application and consistent with the description in its application. If, for any reason, the contribution will not be used for this purpose, the qualifying organization will need to notify AT&T and request a redirection of the funds toward another charitable purpose consistent with AT&T's Policy and applicable law. AT&T may, in its discretion, approve the redirection or require the return of funds to AT&T.

The funding by AT&T, the selection process of organizations, projects and programs for receiving funding from AT&T and the utilization of funds by such organizations or such project and programs need to comply with applicable law, codes of conduct and best industry practices including those relating to accountability and anti-corruption laws and practices of relevant jurisdictions. The requirements under Indian (inter alia the Prevention of Corruption Act, 1988) and US anti-corruption laws (inter alia, the US Foreign Corrupt Practices Act, 1977) need to be followed. AT&T insists on proper accounting, record keeping, compliance management and audit.

### **Employee Engagement**

AT&T encourages its employees to participate in community giving and outreach activity and participate in its CSR initiatives by giving suggestion for projects, programs and activities to be undertaken under its CSR Policy and to volunteer their time and effort in support of its CSR policy.

AT&T India employees can submit their CSR Project ideas and proposals by engaging the CSR Program Manager or the AT&T India CSR Committee.

### **Contact**

For enquiries regarding the CSR Policy, CSR Committee(s), Projects, Programs, Activities and all matters related thereto, please contact us at [rm-ATTIndiaCSR@intl.att.com](mailto:rm-ATTIndiaCSR@intl.att.com)