

Confidentiality Class	External Confidentiality Label	Document Type	Page
Ericsson Internal		Policy	1 (10)
Prepared By (Subject Responsible)		Approved By (Document Responsible)	Checked
EAMIKAS Amit Shankar Kashyap		BCSSLI [Rajesh Gupta J]	
Document Number	Revision	Date	Reference
EGI-17:003590 Uen	H	2024-12-17	



# EIPL Corporate Social Responsibility Policy

## Abstract

Corporate Social Responsibility Policy at Ericsson India Private Limited (*formerly known as Ericsson India Global Services Private Ltd.*) (referred to as the '**Company**' or '**EIPL**') is drawn in pursuance to Section 135 of the Companies Act, 2013 (hereinafter referred to as '**the Act**') read with the relevant rules notified by the Ministry of Corporate Affairs, Government of India, in this regard. The endeavour is to apply the competence and solutions of the Company to empower people and society to shape a more sustainable world.

Sustainability is central to Ericsson's purpose. Ericsson is committed to creating positive impacts in society and reducing risks to Ericsson, our customers, and society through our technology, our solutions, and the expertise of our people. Ericsson's Sustainability and Corporate Responsibility strategy cover three focus areas: Responsible business, Environmental sustainability, and Digital inclusion.

## Application

This Policy is valid for the Company.

The Policy shall apply to all Corporate Social Responsibility ('**CSR**') projects or programs undertaken by the Company in India as per the applicable provisions of Section 135 of the Companies Act, 2013 (the "**Act**") read with Schedule VII of the Act and relevant rules prescribed under the Act (the "**Rules**") as amended from time to time.

In accordance with Section 135 of the Act and the Rules, the following activities shall **NOT** qualify as CSR activities:

- i. activities benefitting the 'Employees' of the Company
- ii. activities are undertaken in pursuance of the normal course of business of EIPL
- iii. one-off events such as marathons/ awards/ charitable contribution / advertisement / sponsorship of television programs, etc.
- iv. contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- v. any activity is undertaken outside India except for training of Indian sports personnel representing any State or Union territory of India at the national level or India at the international level
- vi. activities carried out for the fulfillment of any other statutory obligations under any law in force in India; and
- vii. activities supported by the Company on a sponsorship basis for deriving marketing benefits for its products or services.



Confidentiality Class	External Confidentiality Label	Document Type	Page
Ericsson Internal		Policy	2 (10)
Prepared By (Subject Responsible)	Approved By (Document Responsible)		Checked
EAMIKAS Amit Shankar Kashyap	BCSSLI [Rajesh Gupta J]		
Document Number	Revision	Date	Reference
EGI-17:003590 Uen	H	2024-12-17	

## Content

<b>1</b>	<b>Instruction</b> .....	<b>2</b>
1.1	Definitions:.....	2
1.2	Ericsson Sustainability Policy.....	3
1.3	EIPL CSR Committee.....	3
1.4	Thematic Areas.....	4
1.5	Modalities of Utilization of Funds.....	5
1.6	Selection & Implementation Process of CSR initiatives.....	6
1.7	Monitoring & Disclosure.....	7
1.8	Need & Impact Assessment.....	7
1.9	Connection to Ericsson Business Process (mandatory).....	8
1.10	Adherence/Compliance Controls (mandatory).....	8
<b>2</b>	<b>Responsibilities</b> .....	<b>8</b>
2.1	EIPL Board of Directors.....	8
2.2	EIPL CSR Committee.....	8
2.3	EIPL S&CR program manager.....	9
2.4	EIPL CSR Committee Secretary.....	9
<b>3</b>	<b>Exemption/Deviation</b> .....	<b>9</b>
<b>4</b>	<b>Contacts for this Instruction</b> .....	<b>9</b>
<b>5</b>	<b>References</b> .....	<b>9</b>
<b>6</b>	<b>Change Information</b> .....	<b>10</b>

## 1 Instruction

### 1.1 Definitions:

- i. "Act" means the Companies Act, 2013, as amended from time to time.
- ii. "Board of Directors" or "Board" means the collective body of the directors of the Company, so appointed under the Act.
- iii. "Company" means Ericsson India Private Limited (formerly Ericsson India Global Services Private Limited) ('EIPL'). It shall include EIL & EGI Trigrams.
- iv. "Corporate Social Responsibility (CSR) Activities" means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act read with the prescribed CSR Rules and Schedule VII of the Act.
- v. "CSR Committee" means Corporate Social Responsibility Committee constituted by the Board of Directors of the Company.



Confidentiality Class	External Confidentiality Label	Document Type	Page
Ericsson Internal		Policy	3 (10)
Prepared By (Subject Responsible)	Approved By (Document Responsible)		Checked
EAMIKAS Amit Shankar Kashyap	BCSSLI [Rajesh Gupta J]		
Document Number	Revision	Date	Reference
EGI-17:003590 Uen	H	2024-12-17	

- vi. "CSR Rules" means the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.
- vii. "Employee" refers to all on-roll employees of the Company
- viii. "Implementing Agency" means any entity registered with the Ministry of Corporate Affairs for undertaking CSR projects, which is engaged by the Company to implement various CSR projects in pursuance of CSR Policy as provided in the Annexure for the Annual Action Plan.
- ix. "Ongoing Project" means a multi-year project undertaken by a Company in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification.
- x. "Administrative overheads" means the expenses incurred by the Company for 'general management and administration of CSR functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular CSR project or program.

Any term used in this Policy but not defined herein shall have the same meaning assigned to them under the Act and CSR Rules as applicable to the Company, as amended from time to time.

## 1.2 Ericsson Sustainability Policy

Ericsson Sustainability Policy is mandatory for all employees and it is communicated and updated periodically. Sustainability is central to Ericsson's core business and commitment to the triple essential point approach of responsible environmental, social, and economic development.

EIPL CSR Policy takes cognizance of the Ericsson Process for Sponsorship and Donation including Mandatory Profit distribution. Refer more [about our Sponsorships and Donations program - Ericsson](#).

The EIPL CSR policy would be published externally once Company specific website would be available in India. Meanwhile, the Policy has been published on the Intranet.

## 1.3 EIPL CSR Committee

EIPL CSR Committee has been constituted by the EIPL Board of Directors, which comprises three or more Directors including the Independent Director if any. The Board



Confidentiality Class	External Confidentiality Label	Document Type	Page
Ericsson Internal		Policy	4 (10)
Prepared By (Subject Responsible)	Approved By (Document Responsible)		Checked
EAMIKAS Amit Shankar Kashyap	BCSSLI [Rajesh Gupta J]		
Document Number	Revision	Date	Reference
EGI-17:003590 Uen	H	2024-12-17	

may also include the other employees of the Company (or Group Company) as Executive members of the CSR Committee. The Director members shall only form the quorum.

The CSR Committee shall comprise the Board members including members in attendance as provided in **Annexure A**.

## 1.4 Thematic Areas

EIPL's CSR and welfare activities are shaped by the Ericsson Sustainability Policy and those initiatives that have positive social, environmental, and economic impacts on people, business, and society and align with the vision and mission of Ericsson. The CSR projects will also see potential possibilities for employee engagement, the sole intent is to build social – conscience amongst employees benefitting society at large. Subject to the provisions of the Companies Act, 2013 read with Schedule VII of the Act, the thematic areas are chosen from the Schedule VII of the Act and decided by EIPL CSR Committee with reference to Ericsson Process for Sponsorship and Donation including mandatory Profit distribution.

Presently, our CSR activities center around the following approved areas:

- i. Education: Promoting education including special education, employment enhancing vocation skills especially among children, and livelihood enhancement projects
- ii. Diversity & Inclusion initiative including Healthcare and Eradicating hunger, poverty, and malnutrition including preventive health care and sanitation and making available food & safe drinking water.
- iii. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government.
- iv. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources, and maintaining the quality of soil, air, and water.
- v. Activities that support the Government of India's mission of Swachh Bharat through cleanliness and improvement in the quality of soil, air, and water
- vi. Contributions or funds provided to disaster management, including relief, rehabilitation, and reconstruction activities in the approved funds as notified under Schedule VII of the Act.

Ericsson also believes in being a good corporate citizen and a responsible neighbor in the communities in which we operate. Ericsson aims to integrate Employee's volunteering in our projects and programs in an effort to include our employees in addressing global challenges at a local level and moving CSR from the Boardroom to community action

Ericsson aims to partner with global leaders and/or local authorities to eradicate hunger/malnutrition in affected areas in India by providing support through technology



Confidentiality Class	External Confidentiality Label	Document Type	Page
Ericsson Internal		Policy	5 (10)
Prepared By (Subject Responsible)	Approved By (Document Responsible)		Checked
EAMIKAS Amit Shankar Kashyap	BCSSLI [Rajesh Gupta J]		
Document Number	Revision	Date	Reference
EGI-17:003590 Uen	H	2024-12-17	

for good, working together with local stakeholders to create/provide solutions to enhance the reach of distribution of food/safe water to all beneficiaries.

However, the Company may, subject to the approval of the CSR Committee, undertake any CSR project in areas or subjects, specified in Schedule VII of the Companies Act, 2013 from time to time with reference to Ericsson Process for Sponsorship and Donation including mandatory Profit distribution.

The CSR Committee shall formulate and recommend to the Board, an Annual Action Plan which shall include the following: -

- a. the list of CSR projects or programs that are approved and to be undertaken in areas or subjects specified in Schedule VII of the Act by the Company.
- b. the manner of execution of such projects or programs,
- c. the modalities of utilization of funds and implementation schedules for the projects or programs,
- d. monitoring and reporting mechanism for the projects or programs and
- e. details of need and impact assessment, if any, for the projects undertaken by the Company

Provided that the Board of Directors are empowered to alter the Annual Action Plan at any time during the financial year, if so, recommended by the CSR Committee, based on the reasonable justification for such change. Annual Action Plan is provided as **Annexure B**.

## 1.5 Modalities of Utilization of Funds

The Board of Directors of the Company is responsible to provide for an approved CSR Budget which shall be at least 2% of the average net profits of the Company, calculated under Section 198 of the Act, made during the three immediately preceding financial years.

The CSR Committee is responsible for ensuring that in every financial year, funds committed by the Company for CSR Programs are utilized effectively and there is an effective system of regularly monitoring & implementation such projects, which are made in accordance with this Instruction. The CSR Committee is responsible to maintain a Management Information System (MIS) on expenditure across sectors and geographies and the beneficiaries impacted. The MIS structure shall be aligned to the reporting format prescribed by the Companies Act, 2013.

**Expenditure of CSR Funds** (Unspent, excess spent, or Surplus, if any):

- The Company may spend up to 2% of the total CSR expenditure out of CSR budget amount or Rs. 50 lakhs, whichever is higher, in one financial year on general and administrative overheads.
- Unspent CSR amount, if any, shall be transferred to a separate account in accordance with the applicable CSR Rules from time to time.
- Any surplus arising out of the CSR Projects or programs or activities shall not form part of the business profit of the Company and shall be ploughed back into the same project in the current Financial Year or be allocated for an ongoing project to



Confidentiality Class	External Confidentiality Label	Document Type	Page
Ericsson Internal		Policy	6 (10)
Prepared By (Subject Responsible)	Approved By (Document Responsible)		Checked
EAMIKAS Amit Shankar Kashyap	BCSSL I [Rajesh Gupta J]		
Document Number	Revision	Date	Reference
EGI-17:003590 Uen	H	2024-12-17	

be spent in any of the three succeeding financial years or will be transferred to a fund specified in Schedule VII.

- Any excess expenditure i.e., beyond the prescribed CSR budget will be disclosed in the Board's CSR Report and shall be made available for set off against the CSR requirement for spend in any of the three succeeding financial years.

The CSR amount spent by the Company for the creation or acquisition of a capital asset shall not be held by the Company.

The EIPL CSR Committee will satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer will certify the same to that effect.

## 1.6 Selection & Implementation Process of CSR initiatives

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 programs are based upon qualified thematic areas and encompass areas defined in the Ericsson Sustainability Policy. Similarly, the CSR Committee may take cognizance of the relevance of Projects towards sustainable development Goals if the projects align with Ericsson Sustainability Policy and Donation process including mandatory profit distribution. The CSR Committee, where appropriate, may also examine the potential of projects/ programs to integrate Employee Volunteering

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 projects undertaken by the Company will be implemented in India and will be determined as per the needs of the community.

CSR initiatives will be implemented either directly by the Company or through eligible Implementing Agencies.

### Anti-Bribery & Corruption ('ABC') Compliance Approval Flow

All CSR activities where beneficiaries are involved are subjected to Compliance review from the ABC perspective.

Contribution Donation category Process flow shall be followed. The tool to be used is the Contribution APP ([SAP Fiori](#)). Submit the contribution request in the tool for the approval of MA/BA Head subject to pre-approval from Compliance. The key steps of the process are:

- S&CR SPOC will reach out to the responsible Compliance Officer for approval of the project. All required KYC / diligence documents about beneficiaries will be shared with the Compliance Officer.
- The responsible Compliance Officer reviews the planned activity details and beneficiaries.



Confidentiality Class	External Confidentiality Label	Document Type	Page
Ericsson Internal		Policy	7 (10)
Prepared By (Subject Responsible)	Approved By (Document Responsible)		Checked
EAMIKAS Amit Shankar Kashyap	BCSSLI [Rajesh Gupta J]		
Document Number	Revision	Date	Reference
EGI-17:003590 Uen	H	2024-12-17	

- The responsible compliance officer can seek additional information for analysis from the EIPL S&CR program manager (s).
- The Compliance Officer will share a detailed report with his/her recommendations. The Compliance Review and analysis can be captured into the contribution app (SAP Fiori).
- EIPL S&CR program manager(s) will be responsible to ensure conditions, if any, pertinent to compliance reviews.

The Projects and Programs so selected are described in detail under the Annual Action Plan as per Annexure to this Instruction.

## 1.7 Monitoring & Disclosure

The CSR Committee shall 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, as amended from time to time. Monitoring of CSR activities would be done through:

- Periodic review of approved CSR Programs with key indicators by CSR committee
- Impact assessment for any or all eligible CSR programs, as applicable
- Ensure that appropriate disclosures are made in the Board's Report.

## 1.8 Need & Impact Assessment

CSR activities undertaken should be in the interest of the society and the local population where the Company operates. Before undertaking any project or activities the Company shall conduct a need assessment for the project and its utility in the demography where the project is proposed.

As per the provisions of the Act, a Company having an average CSR obligation of ten crore rupees or more in the three immediately preceding financial years shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study or such other limits as may be prescribed under the CSR Rules. A Company shall spend up to 2% of the total CSR expenditure in one financial year or 50 lakh rupees, whichever is higher, on undertaking impact assessment for the applicable projects, as provided in the CSR Rules or its amendment thereof.

The Company shall undertake Impact Assessment for its eligible programs. The Impact Assessment reports shall be placed before the Board for its consideration and a summary of the Impact Assessment outcome shall be disclosed in the Board Report.



Confidentiality Class	External Confidentiality Label	Document Type	Page
Ericsson Internal		Policy	8 (10)
Prepared By (Subject Responsible)	Approved By (Document Responsible)		Checked
EAMIKAS Amit Shankar Kashyap	BCSSL I [Rajesh Gupta J]		
Document Number	Revision	Date	Reference
EGI-17:003590 Uen	H	2024-12-17	

## 1.9 Connection to Ericsson Business Process

[Contributions at Ericsson - Home \(sharepoint.com\)](#) for Process description, instructions and FAQs describing Approval Processes, training material, etc.

## 1.10 Adherence/Compliance Controls

The Contributions app is an essential internal tool in simplification journey, providing several benefits through digitalization: streamlined navigation of process steps, integration with Ericsson tools, and enhanced control and traceability of high-risk transactions including Mandatory profit distribution. The tool serves as a repository for documentation, including activity descriptions, approvals, and compliance reports.

## 2 Responsibilities

### 2.1 EIPL Board of Directors

The Board of the Company is responsible for:

- Constituting the EIPL CSR Committee and formulating its terms of reference
- Formulating and approving the CSR Policy
- Approving the CSR budget
- Approving Annual Action Plan
- Approval of Impact Assessment Report, if any,

### 2.2 EIPL CSR Committee

The EIPL CSR Committee is responsible for monitoring and implementation of the CSR Programs. Monitoring may include field visits, comprehensive documentation, and interaction with beneficiaries.

The functions of the EIPL CSR Committee is as follows:

- To formulate and recommend a CSR Policy indicating the activities to be undertaken by the Company in areas or subjects specified in Schedule VII to the Act
- To recommend the amount of expenditure to be incurred on the activities
- To formulate and recommend to the Board an Annual Action Plan in pursuance of CSR Policy
- To formulate Impact Assessment Report through independent agency and recommend the same to Board for its approval
- The CSR Committee shall adopt the approach and Board's direction of CSR activities to be undertaken by the Company. Key roles are:
  - Selection of CSR projects
  - Implementation of CSR projects
  - Monitoring of CSR projects including Management Information System (MIS) on expenditure across sectors and geographies and the beneficiaries impacted.

Confidentiality Class	External Confidentiality Label	Document Type	Page
Ericsson Internal		Policy	9 (10)
Prepared By (Subject Responsible)	Approved By (Document Responsible)		Checked
EAMIKAS Amit Shankar Kashyap	BCSSLI [Rajesh Gupta J]		
Document Number	Revision	Date	Reference
EGI-17:003590 Uen	H	2024-12-17	



The EIPL CSR Committee may delegate all or any of its responsibilities to the officers of the Company. Terms of Reference duly approved by the EIPL Board of Directors are provided for EIPL CSR Committee indicating its duties, powers, and responsibilities, as provided in **Annexure C**.

### 2.3 EIPL S&CR program manager(s)

- EIPL S&CR program manager shall be responsible for activities mentioned in para 2.2 above and shall ensure implementation of CSR projects, directly or indirectly, as per the rules and provisions of the Act.
- EIPL S&CR program manager will be responsible to ensure conditions if any, pertinent to compliance reviews as indicated by the Compliance Officer under ABC process
- EIPL S&CR program manager shall be responsible for project execution evidence and reports for record & audit purposes for 8 years from end of the respective financial year.

### 2.4 EIPL CSR Committee Secretary

- Responsible for all statutory reporting under the provisions of the Act

## 3 Exemption/Deviation

In line with Instruction, [EAB-10:17160 Uen](#), Governance of Steering Documents, all Group and Local Steering Documents are mandatory unless an exemption/deviation is granted following process described in Work Instruction, [000 21-2908 Uen](#), Rules for writing and handling Group and Local Steering Documents.

This instruction is approved by EIPL Board of Directors.

## 4 Contacts for this Instruction

Please contact EIPL Company Secretary (EAMIKAS).

## 5 References

- i. Annexure A - [EIPL CSR Committee Members](#)
- ii. Annexure B - [EIPL Annual Action plan](#)
- iii. Annexure C - [EIPL Terms of Reference](#)
- iv. Local Law - [Section 135 of the Companies Act, 2013](#)
- v. [About our Sponsorships and Donations program - Ericsson](#)
- vi. Group Policy, [011 03-2891 Uen](#), Sustainability Policy
- vii. Company-wide Process for Contributions [155 01-FEA 901 066 Uen](#)
- viii. Global Instruction – Contribution Category - Donations & Mandatory Profit Distributions, [3/155 01-FEA 901 066 Uen](#)
- ix. [Contributions at Ericsson – Contribution App – raise a request.](#)
- x. Group Policy, [Code of Business Ethics](#)



Confidentiality Class Ericsson Internal	External Confidentiality Label	Document Type Policy	Page 10 (10)
Prepared By (Subject Responsible) EAMIKAS Amit Shankar Kashyap	Approved By (Document Responsible) BCSSL I [Rajesh Gupta J]	Checked	
Document Number EGI-17:003590 Uen	Revision H	Date 2024-12-17	Reference

## 6 Change Information

Sl. No	Date	Change Description	Document Version
1.	2014	First release	A
2.	1 <sup>st</sup> August 2017	Aligned with Companies Act, 2013 & rules thereto Added: Technology Incubators as another Thematic Areas	B
3.	15 <sup>th</sup> Feb 2018	Added: Eradicating Hunger and providing technological support in the distribution system of Food/ safe water	C
4.	22 <sup>nd</sup> Nov 2018	Added: i. Environment-related activities which include the promotion of environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry and conservation of natural resources ii. Activities that support the Government of India's mission of Swachh Bharat through cleanliness and improvement in the quality of soil, air, and water	D
5.	24 <sup>th</sup> Sep 2020	i. Contributions or funds provided to State disaster management, including relief, rehabilitation, and reconstruction activities	E
6.	13 <sup>th</sup> Sept 2021	<ul style="list-style-type: none"> <li>This Local instruction has been revised as per LSDC Format</li> <li>Aligned with Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021</li> </ul>	F
7	29 <sup>th</sup> Sept 2021	<ul style="list-style-type: none"> <li>Version control updated. No change in content</li> </ul>	G
8	Sept 2024	<ul style="list-style-type: none"> <li>Change of name of Company from Ericsson India Global Services Private Limited to Ericsson India Private limited pursuant to approval of Scheme of Arrangement on 13<sup>th</sup> September 2023 and aligned with Companies (Corporate Social Responsibility Policy) Amendment Rules, 2022 and consequently, consolidation EIL CSR Policy into this.</li> <li>Revised the limits of expenditure towards Impact Assessment from 5% to 2% as per amendment in the law(Clause 1.8)</li> <li>Ericsson Process for Sponsorship &amp; donations including mandatory profit distribution in the Reference Section</li> </ul>	H