

Honeycomb Telnet Private Limited

CORPORATE SOCIAL RESPONSIBILITY POLICY

Dated: 30.09.2026

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HONEYCOMB TELNET PRIVATE LIMITED

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INTRODUCTION

1. PREAMBLE

Since its inception in the year 2015, M/s Honeycomb Telnet Private Limited (HTPL) is engaged in the business of provision of internet services.

The Company intends to make a positive difference to society and contribute its share towards the social cause of betterment of society and area in which company operates. The Company also believes in the trusteeship concept. This entails transcending business interests and working towards making a meaningful difference to the society.

We, at Honeycomb Telnet Private Limited believe that creation of large societal capital is as important as wealth creation. As a responsible human organization, we are committed towards the above objective and are keen on developing a sustainable business model to ensure and activate our future growth drivers. In line with the regulatory expectations, we are putting in place a formal policy as a guide towards our social commitment going forward.

2. DEFINITION CLAUSE

"Act" means The Companies Act, 2013 and includes the Companies (Corporate Social Responsibility Policy) Rules, 2014 and all other applicable rules and any statutory modifications, re-enactment thereof.

"Board" means the Board of Directors of the Company"

"Company" means Honeycomb Telnet Private Limited.

"Corporate Social Responsibility" means and includes but is not limited to-

- (i) Projects or programs relating to activities specified in Schedule VII to the Act; or
- (ii) Projects or programs relating to activities undertaken by the Board as per the declared CSR policy of the Companies;

"Net Profit/Profit" refers to the average net profits of the Company, calculated in accordance with the provisions of section 198 of the Companies Act, 2013.

3. APPLICABILITY

As per Section 135(1), of the Act, Corporate Social Responsibility ('CSR') is mandated if the Company fulfilled any of the below criteria in the immediately preceding financial year, then the Company need to comply with Section 135 and the Rules made there under.

- Companies having net worth of Rs. 500 crores or more or
- Companies having turnover of Rs. 1000 crores or more or
- Companies having a Net profit of Rs. 5 crores or more

4. FUNDING AND ALLOCATION

For achieving its CSR objectives through implementation of meaningful & sustainable CSR programs, the Company shall allocate 2% of average net profit before tax (PBT) made during the three immediately preceding financial years, as its annual CSR Budget

For the purpose of this clause computation details is attached in Annexure-1

The surplus arising out of the CSR activities if any, shall be reinvested into CSR initiative only, and shall not form the part of business profit.

5. DISCHARGE OF LIABILITY

The Board of Director of the HTPL after discussion may discharge the liabilities pertains to the CSR as per the provisions of the policy.

The Board of Directors of the Company may constitute or re-constitute the Committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The Committee shall exercise powers and perform the functions assigned to it by the Board of Directors of the Company pursuant to section 135 of the Companies Act, 2013 and CSR Rules notified with regard thereto.

6. CSR VISION STATEMENT

In alignment with vision of the company, through its CSR initiatives, the Company, will enhance value creation in the society and in the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth in the society and community around it along with environmental concern.

Further, take up those programs directly or indirectly, that benefit the communities and society at large, over a period of time, in enhancing the quality of life & economic well- being of the local populace.

7. CSR ACTIVITIES

The annual CSR Budget shall be allocated on the following expenditure heads, on a year-to-year basis:

- (i) eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and making available safe drinking water;
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly. and the differently abled and livelihood enhancement projects;
- (iii) 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;
- (iv) 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;
- (v) 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;

- (vi) Measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
- (viii) 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;
- (ix) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) Rural development projects.

Provided that the CSR projects or programs or activities that benefit only the employees of the Company and their families or any contribution to any political party shall not be considered as a CSR activity in accordance with this policy.

8. ROLE OF THE CSR COMMITTEE (AS AND WHEN CONSTITUTE IN FUTURE)

- Draft the CSR policy and recommend the same to the Board for approval.
- Review and recommend any new CSR initiatives to be taken up by the company.
- Recommend the amount of expenditure to be incurred on the activities referred to in the CSR Policy.
- Review and recommend the CSR report to be included in the Board's report.
- Review and recommend any amendments to be made in the CSR policy of the Company.
- To carry such other functions as may be delegated to it by the board relating to CSR activities of the company

9. BOARD'S RESPONSIBILITY

The Board of Directors is required to approve the CSR Policy after considering recommendations of CSR Committee (if any constituted).

The Board shall make sure that:

- (i) The Activities included in CSR Policy are related to activities included in Schedule VII of the Act;
- (ii) The Activities as included in CSR Policy are undertaken by the Company;
- (iii) In case the unspent amount does not relate to any ongoing project, unspent amounts to be transferred to a Fund specified under Schedule VII within a period of six months of the expiry of the financial year;
- (iv) In case if any unspent amount for any ongoing project, the Company subject to fulfilling of prescribed conditions, transfer the amount within 30 days from the end of the financial year to any scheduled bank account which shall be opened by the Company exclusively for this purpose and to be called as the "Unspent Corporate Social Responsibility Account" by the Company.

- (v) Such amount kept in the special bank account shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three 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 thirty days from the date of completion of the third financial year.
- (vi) Board shall disclose in Board's report the composition of CSR committee, if any constituted, annual CSR report and unspent amount of CSR along with the reason for the same.

10. IMPLEMENTATION

General points:

The Company can implement its CSR activities through:

- > Programs undertaken by the Company at various work centres to the best possible extent.
- > Its own non-profit foundations/company (incorporated under Section 8 of the Act) so as to facilitate this initiative.
- > a registered trust or a society/agency;

Provided that such specialized trust or society/agency; shall have a track record of three years in undertaking similar programs or projects;

- > the process of collaborating or pooling with other companies for undertaking projects or programs or CSR activities in such manner that the CSR Committees of respective companies are in a position to report separately on such projects or programs in accordance with these rules.

- > The CSR programs or activities undertaken in India only shall amount to CSR Expenditure

Provided that, the Company has specified the project or programs to be undertaken through these entities, the modalities of utilization of funds on such projects and programs and the monitoring and reporting mechanism.

11. AMENDMENT OF CSR POLICY

The CSR policy of the company may be amended at any time by the board of the company or on the Recommendation of the CSR committee, if any constituted.

Annexure-I**CSR amount overview**

Sl. No.	Particular	Amount (in Rs.)
(1)	(2)	(3)
(i)	Two percent of average net profit of the company as per sub-section (5) of section 135	Rs. 6.67 Lakhs
(ii)	Total amount spent for the Financial Year (2024-25)	Rs. 9.10 Lakhs
(iii)	Excess amount spent for the Financial Year [(ii)-(i)]	2.43
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous Financial Years, if any	0.00
(v)	Amount available for set off in succeeding Financial Years [(iii)-(iv)]	0.00