

Sandvine Technologies (I) Pvt. Ltd., a fully owned subsidiary of Sandvine Corporation developing products in the area of Data networking.

This CSR Policy encompasses SANDVINE's India location philosophy for social responsibilities and lays down the guidelines and mechanism for undertaking projects, programs and activities towards such responsibilities. This policy is maintained by the CSR Committee – Chairperson.

For more information visit- <https://www.sandvine.com>

Vision Statement and Objective

1. The CSR Policy sets out SANDVINE's commitment towards ensuring that corporate activities extend beyond business and include initiatives and endeavours for the benefit and development of individuals, society & environment. The CSR Policy lays down guidelines for undertaking programs geared towards welfare activities or interventions. Through this policy, SANDVINE proposes to adopt the CSR Activities mentioned below.
2. In alignment with the above vision, SANDVINE, through the CSR Activities, will endeavor to enhance value creation, through its services, conduct and initiatives, so as to promote sustained growth for the society and community, in fulfilment of its role as a socially responsible corporate.
3. This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act 2013 and the rules issued thereunder.
4. The objective of the CSR Policy is to:
 - a. Provide approach & direction including guiding principle for selection, implementation & monitoring of CST activities
 - b. Formulation of Annual Action plan Outline projects, programs and activities to be undertaken by SANDVINE;
 - c. Specify the modalities of execution of such projects, programs and activities;
 - d. Monitor the process to be followed for such projects, programs and activities;
 - e. Generate goodwill for Responsibility initiatives at SANDVINE and help reinforce a positive and socially responsible image, through CSR Activities.

CSR Committee

1. The CSR Committee has been constituted in accordance with the provisions of the Act comprising of the 2 (Two) Directors, namely Eldose M Paul, VP Customer Enablement and Ambuj Mittal, VP R&D. The CSR Committee may invite other experts/ invitees as per its requirements.
2. The CSR Committee shall be responsible for:
 - a. Formulating, monitoring and recommending to the Board the CSR Policy any subsequent change / modifications thereto;
 - b. Recommending the amount to be spent and their budgets as well as recommendation of any subsequent change/modification thereto;
 - c. Institute an implementation and monitoring mechanism for CSR Activities;
 - d. Periodically updating the Board on the progress being made in the planned CSR Activities;
 - e. Providing an Annual Action Plan to the Board.

Projects, Programs and Activities

1. SANDVINE India has identified the following focus areas of intervention:
 - a. Promotion of education, including special education and employment enhancing vocation skills especially among children, women, elderly and differently abled and livelihood enhancement projects. Supplementing & improving the quality of education of handicapped children
 - b. Eradicating extreme hunger and poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.
 - c. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining of quality of soil, air and water.
2. The criteria for selecting areas project where the CSR Activities will be carried will, inter-alia, comprise of the following:
 - a. The projects/ interventions must be located predominantly in and around Bangalore
 - b. The projects should accommodate ongoing voluntary employee engagement
3. The CSR committee shall undertake, if required, data collection, survey, quotations and costs estimation etc., in respect of CSR activities. For this purpose, the CSR Committee may also approach external consultants for necessary assistance as it may deem fit at such costs as may be approved by the Board.
4. Based on the recommendations of the CSR Committee, the Board shall approve the following:
 - a. Approve the CSR policy and amendments, if any
 - b. The specific CSR Activities that should be undertaken from time to time;
 - c. Whether the CSR Activities will be undertaken directly or through an implementing agency or in collaboration with any other companies, including by availing services of any NGOs.
 - d. Approve the Annual CSR Report
 - e. Approve the disclosures in the Annual Directors report
 - f. Approve the disclosures in the Company website
5. Activities undertaken in pursuance of the normal course of SANDVINE's business shall not be considered towards CSR Expenditure.

Annual Action Plan

1. An Annual Action Plan will be prepared to include:
 - a. Approved CSR projects
 - b. Manner of execution of the projects
 - c. Modalities of utilisation of funds
 - d. Implementation schedules

- e. Monitoring and reporting mechanism
 - f. Details of need
 - g. Impact assessment, if any,
2. The plan shall be prepared before the commencement of the next financial year or latest before the first CSR committee meeting for the financial year.
 3. The CSR Annual Plan may, however, be amended/modified at any time during the financial year by the Board.
 4. The approved CSR Annual Plan shall form part of this policy.

CSR Expenditure and Allocation

1. The CSR spend by shall be as per the requirements of the Companies Act 2013. The entity may in compliance with the provisions of the Act and the CSR Rules, including notifications and clarifications issued thereunder receive funds from its parent company for the CSR Expenditure.
2. The Board shall approve the allocation of the CSR Expenditure on the CSR Activities and, to the extent possible, shall give priority to the local areas wherever SANDVINE has its operations.
3. On the basis of identified CSR activities/projects, the Annual CSR Plan shall be prepared.
4. The CFO of the company shall certify that the funds so disbursed for CSR have been utilised for the purposes and in the manner approved.

Implementation

1. Baseline survey as required & if necessary would be conducted by the implementing agency and annual reviews shall be undertaken to ascertain the progress.
2. The Board along with the CSR Committee shall be responsible for implementation of this CSR Policy.
3. Sandvine may undertake the CSR Activities either on its own or through other qualifying Non-government organizations (“NGOs”) or agencies. The projects, programs or activities identified by the CSR Committee and approved by the Board shall be implemented in a project mode which will entail charting the stages of execution through planned processes, measurable targets, mobilization and allocation of budgets and prescribed timelines.
4. To the extent feasible, a project based accountability approach to stress on the long term sustainability of CSR Activities shall be adopted, and the indicative action plan and implementation schedule (timelines) for the projects, programs and activities shall be adopted.

Monitoring Mechanism

1. To ensure effective implementation of the CSR projects, programmes and activities undertaken in terms of this CSR Policy, the progress of each such project, programme and activity will be reported to the CSR Committee on a quarterly/periodic basis, with all requisite documentation.
2. A quarterly report on implementation shall be submitted to the Board by the CSR Committee.

3. The CSR Committee will conduct impact studies if necessary on a periodic basis, through independent professional third parties/professional institutions.
4. The CSR Committee shall also try to obtain feedback from the beneficiaries of the CSR projects, programmes and activities. If considered necessary, the effectiveness of the various programs/activities undertaken under the CSR Policy may be got evaluated through external agencies for providing the required feedback and inputs to formulate and improve the programs in future.

Assessment

1. Regular and interactive feedback sessions shall be conducted at all levels including with other NGOs through which CSR Activities are being undertaken as well as the respective beneficiaries of all the CSR Activities undertaken by us.
2. Field visits shall be conducted at regular intervals to ensure effective implementation.
3. Proper documentation shall be done to record key observations of such feedback sessions and field-visits.
4. If deemed necessary by the CSR Committee, the effectiveness of the various programs/activities undertaken under the CSR Policy may be evaluated through external agencies and impact reports shall be obtained pursuant to such evaluation.

Reporting

1. The CSR Committee shall maintain proper minutes of all its meetings.
2. The CSR Committee shall prepare an annual report on CSR with such information and particulars as may be required by the Act and such report shall be included in the Board's report annexed to the financial statements.
3. The Board's report shall include an annual report on CSR containing such details as may be prescribed from time to time under the Act and the CSR Rules.
4. The Board will be responsible to ensure that the statutory requirements as may be prescribed from time to time under the Act and the CSR Rules are complied with.

General

1. Any surplus arising out of the CSR projects/programs or activities shall not form part of the business profits.
2. All administrative expenses, including expenditure on wages and salaries, tours and travels, and training and development of personnel deputed on CSR Activities would be borne from CSR funds. However, the expenditure in a financial year for building CSR capacities of the personnel as well as the implementing agencies shall not exceed 5% (five per cent.) of total CSR Expenditure in such financial year.
3. If it is observed that any CSR Activity taken up for implementation is found not properly implemented, the CSR Committee may, with approval of the Board, may discontinue funding the project at any time during the course of implementation and use such funds for any other project.

4. The CSR Committee shall have the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this CSR Policy.

Others

1. The CSR Committee is empowered to amend or modify the CSR Policy and such changes shall be placed before the Board for its approval. The Board may subject to compliance with applicable law, at any time approve or alter, amend or modify the CSR Policy, as it deems fit to comply with the statutory obligation to undertake the CSR Activities.
2. This supersedes the CSR Policy Version 1.0 which was approved by the Board on March 9, 2021.