

POONAWALLA FINCORP LIMITED

Corporate Social Responsibility Policy

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Background:

Section 135 of the Companies Act, 2013 (“the Act”) mandates the following classes of companies to formulate and adopt a Corporate Social Responsibility (CSR) Policy and draw out a framework for CSR:

- a) Net worth of Rs. 500 Crore or more; or
- b) Turnover of Rs. 1000 Crore or more; or
- c) Net profit of Rs. 5 Crore or more

In accordance with the said mandate of the Act and rules made thereunder, since Poonawalla Fincorp Limited (hereinafter referred as ‘PFL’/ ‘Company’) qualifies on all three criteria, during the immediately preceding financial year, it is required to formulate and adopt CSR Policy.

The Board of Directors of the Company had initially adopted this CSR Policy in terms of section 135(3)(a) of the Act read with the Companies (Corporate Social Responsibility) Rules, 2014 (‘Rules’) and Schedule VII made thereunder on January 20, 2015. The policy has been amended from time to time to align with applicable laws.

The objective of this Policy is to provide an overall CSR framework, which shall at all relevant times be closely aligned with the requirements of relevant provisions of the Act.

Definitions:

- “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 programme;
- “Corporate Social Responsibility” means the activities undertaken by the Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in the Rules, but shall not include the following, namely:-
 - i. activities undertaken in pursuance of normal course of business of the Company;
 - ii. any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
 - iii. contribution of any amount directly or indirectly to any political party under section 182 of the Act;
 - iv. activities benefitting employees of the Company as defined in section 2(k) of the Code on Wages, 2019 (29 of 2019);
Provided that as per the Apprentices Act, 1961, read with circular issued by Ministry of Corporate Affairs dated 12 February, 2016 and Office Memorandum

issued by the Ministry of Skill Development and Entrepreneurship dated 11th March, 2020 the Company is eligible to spend the available CSR funds towards payment of stipend to the apprentices, or for any other activities involving 'employment enhancing vocation skill', over and above the mandatory requirements under the Apprentices Act, 1961 or any other statutory obligations as the case may be.

- v. activities supported by the Companies on sponsorship basis for deriving marketing benefits for its products or services;
 - vi. activities carried out for fulfilment of any other statutory obligations under any law in force in India;
- "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act;
- "CSR Policy" means this Policy, being the policy document, containing the approach and direction statement given by the Board of Directors of the Company, taking into account the recommendations of the CSR Committee. It also includes the guiding principles for selection, implementation and monitoring of the CSR projects or programmes or activities as well as the formulation of 'annual CSR action plan'.
- "CSR Programme(s)" means any CSR projects or programmes or activities undertaken by the Company as per CSR Policy, that is in line with the activities in the areas or subjects as specified in Schedule VII of the Act, as amended;
- "Implementing Agency" shall mean such agency through which the CSR Programme of the Company may be implemented, subject to the same being any of the following:
- a) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company;
 - b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government;
 - c) any entity established under an Act of Parliament or a State legislature;
 - d) a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Explanation.-For the purpose of clause (c), the term "entity" shall mean a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act.'

Provided that every entity mentioned above, must have registered themselves with the Central Government by filing the form CSR-1 electronically with the Registrar.

- “International Organisation” means an Organisation notified by the Central Government as an international Organisation under section 3 of the United Nations (Privileges and Immunities) Act, 1947, to which the provisions of the Schedule to the said Act apply;
- "Net profit" means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely: -
 - i. any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
 - ii. any dividend received from other Companies in India, which are covered under and complying with the provisions of section 135 of the Act:
- “Ongoing Project” means a multi-year project undertaken by the Company in fulfilment of its CSR obligation having timelines not exceeding 3 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 1 year by the Board based on reasonable justification;
- “CSR Unspent Account” means an account opened by the Company with a scheduled commercial bank in terms of section 135(5) of the Act;
- “Public Authority” means ‘Public Authority’ as defined in section 2(h) of the Right to Information Act, 2005;

All other words and phrases not defined herein shall have the same meaning and definition as specified under the Act or the Rules as may be amended from time to time.

Overview:

The Company looks forward to making a positive difference in the society. The Company firmly believes that it has commitment towards all its stakeholders – customers, employees, and the community in which it operates, and it can fulfil this commitment only by sustainable and inclusive growth. The Company aims to improve the quality of life through its positive intervention in the community.

PFL’s key CSR initiatives are undertaken with a long-term view and therefore, initiatives that are sustainable and that have long-term benefits to the society at large are given priority.

CSR Governance:

At PFL, the Board of Directors of the Company have formed a CSR Committee which has been entrusted with the responsibility of formulating a CSR Policy and ensuring transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company.

Formation of CSR Committee:

The CSR Committee will consist of at least 3 directors including 1 Independent Director. Further, composition of the CSR Committee shall be in accordance with the provisions of Articles of Association of the Company as amended from time to time.

The CSR Committee shall meet at least once in a year to carry out activities in accordance with the role of the Committee. The quorum shall be two members or one third of the members of the CSR and as per applicable provisions of the Articles of Association of the Company as amended from time to time. In case of urgent matters, the Committee may resolve to pass the same through circulation.

Role of CSR Committee:

The CSR Committee shall be required to carry out the following activities:

- a) Frame the CSR Policy (including any modifications thereto from time to time) which shall provide approach and guiding principles for selection, implementation and monitoring of CSR activities to be undertaken by the Company as well as formulation of the annual action plan;
- b) Approve and recommend annual action plan, and any modifications thereof, to the Board comprising of following information:
 - a. the list of CSR Programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - b. the manner of execution of such projects or programmes;
 - c. the modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - d. monitoring and reporting mechanism for the projects or programmes; and
 - e. details of need and impact assessment, if any, for the projects undertaken by the Company;
- c) Approve specific projects, either new or ongoing, in pursuance of the focus areas outlined in this Policy, either for undertaking such projects by the Company itself, directly or through its holding, for inclusion in the annual action plan;
- d) Recommend the amount of CSR Spend in the activities to be undertaken to the Board for approval of the annual CSR Budget and the amount to be transferred in case of ongoing projects and unspent amounts;
- e) Monitor the CSR Policy and closely monitor the spending on a 'project basis' regularly;
- f) Review and recommend to the Board, the Annual Report on CSR activities to be included in Board's Report and certificate submitted by the Chief Financial Officer;

- g) Review and recommend to the Board, the impact assessment report obtained by the Company from time to time, wherever applicable;
- h) Undertake such activities and carry out such functions as may be provided under section 135 of the Act and the Rules.

Selection of CSR activities:

PFL believes in transforming the lives of the people especially those belonging to the underprivileged class. PFL has been involved in several CSR activities that can bring a positive change in the society by promoting education, healthcare and environmental sustainability. The Company's key CSR initiatives will be undertaken with a long-term view. Initiatives that are sustainable, that have long-term benefits to the society at large and activities that have business linkage, but which do not result in business benefits will be accorded priority.

CSR Projects/Programme(s):

The scope of activities which the Company will usually undertake towards fulfillment of its CSR shall be in line with Schedule VII of the Act. PFL proposes to lay focus on the following areas:

1. Promoting education
2. Promoting health care including preventive health care
3. Environment sustainability

Apart from the above-mentioned activities, PFL may choose to contribute to the society by undertaking any of the activities as mentioned in Annexure A to this CSR Policy, which is in line with Schedule VII of the Act.

The CSR Committee, while formulating the annual action plan and recommending to the Board, will accord priority to projects in the specific areas of the Company as mentioned above. The CSR Programmes specified under this CSR Policy would be undertaken only in India and the preference shall be given to the local area and/or areas in the vicinity, where the Company operates, for spending the amount earmarked for CSR activities.

The CSR Programme(s) or activities that benefit only the employees of the company and their families shall not be considered as an eligible CSR activity. Further, the activities undertaken in pursuance of normal course of business of the Company shall not be included in CSR.

Contribution of any amount directly or indirectly to any political party under section 182 of the Act shall not be considered as CSR activity.

Collaboration for CSR:

The Company may undertake its CSR activities either directly or through any implementing Agency.

Further, the Company may choose to collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that the CSR Committees of respective companies

are in a position to report separately on such projects or programs in accordance with the Rules and amendments thereto.

Provided that if the Company decides to undertake its CSR Programmes through an Implementing Agency, the projects or programs to be undertaken, the modalities of utilisation of funds of such projects and programs and the monitoring and reporting mechanism shall be specified by the Company.

The Company shall ensure that the Implementing Agencies are duly registered with the Central Government as per the requirements of the Rules.

The following may act as an implementing agency for undertaking CSR activities of the Company –

- a) a Section 8 company, registered public trust, registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of Section 10 or registered under Section 12A and approved under 80 G of the Income Tax Act, 1961, established by the company either singly or along with other company; or
- b) a Section 8 company, registered public trust, or registered society, established by the Central Government or State Government; or
- c) an entity established under an act of Parliament or a State legislature; or
- d) a Section 8 company, registered public trust or registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of Section 10 or registered under Section 12A and approved under 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities; or

Explanation - The term “entity” shall mean a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act.

The Implementing Agency should be credible and should have the ability to execute the CSR Programme effectively. The disbursement by the Company to the Implementing Agency should be made only upon receipt of proposal along with budget and implementation schedule, and in tranches in order to ensure that the amount does not lie unspent with the Implementing Agency.

CSR initiatives of the Company will be reported in the Annual Report of the Company & the Board’s Report in compliance with Section 135 and rules made thereunder.

CSR Plan:

The annual action plan for PFL’s CSR initiative shall be approved by the Board of Directors of the Company. The allocation of funds to the specific projects/ programs will be as recommended by the Committee and approved by the Board.

CSR Expenditure and Unspent amount:

The Company shall endeavor to spend, in every financial year, at least 2% of the average net profits made during the three immediately preceding financial years, in pursuance of its CSR Policy.

Any expenditure incurred on the CSR Programmes or activities undertaken only in India shall qualify as CSR expenditure.

The CSR expenditure can be either revenue expenditure or capital expenditure or both.

Where the Company spends an amount in excess of 2% of its average net profits, such excess amount may be set off against the requirement to spend 2% of its average net profits up to immediate succeeding 3 financial years subject to the conditions that –

- i. the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any.
- ii. the Board of the Company shall pass a resolution to that effect.

Further, any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR Policy and annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

The expenditure can be in cash including but not limited to cheque, NEFT, RTGS etc.; the mode of spending shall be as per the CSR Policy, on a project which is eligible for CSR. Expenditure in kind shall not be allowed.

If the Company fails to spend such prescribed CSR amount in any financial year, the Company shall specify the reasons for not spending such amount. For any unspent amount remaining against the prescribed CSR amount towards a project other than the Ongoing Project, the same shall be transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. Any amount remaining unspent pursuant to any Ongoing Project undertaken by the Company, shall be transferred by the Company within a period of thirty days from the end of the financial year to the “Unspent CSR Account”, and such amount shall be spent by the Company in pursuance of its obligation towards the CSR 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.

Capital asset

The CSR amount may be spent by the Company for creation or acquisition of a capital asset, which shall be held by –

- a. a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number; or
- b. beneficiaries of the said CSR Programme, in the form of self-help groups, collectives, entities; or

- c. a public authority.

Administrative Overheads:

The expenses incurred by the Company in the general management and administration of its CSR activities can be claimed as CSR Expenditure, provided that the same does not exceed 5% of the total CSR Expenditure for the financial year to which it relates.

If the Company chooses to undertake CSR activities directly, it may resort to capacity building, which shall be the expenditure on training of the CSR staff engaged in the implementation of CSR Programme. Expenditure incurred on such capacity building may be claimed as a part of the administrative overheads within the limits permitted under the Act. .

The Company may engage International Organisations for designing, monitoring and evaluation of the CSR Programmes as recommended by the CSR Committee as well as for capacity building of their own personnel for CSR.

Monitoring, Review and Impact Assessment:

Currently, all the CSR activities are driven by the in-house CSR Team. The Company's monitoring and review mechanism includes obtaining monitoring and utilisation report from all Implementing Agencies for the expenditure made by the Company through them.

The Board of Directors of the Company shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

In case of an Ongoing Project, the Board of Directors of the Company shall monitor the implementation of the same with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

The Implementing Agency shall keep the Company informed about any information or circumstances that will affect the ability of the agency to carry out the CSR Programme. Where the CSR amount spent results or resulted in creation or acquisition of capital asset, the Company shall confirm to the CSR Committee about the entity holding the capital asset in accordance with the Rules.

The representatives of the Company and/or Implementing Agency shall carry out site visits/ field visits on a periodic basis to ensure that CSR activities are undertaken transparently. The Company shall carry out impact assessment, directly by engaging an independent agency, in case its average CSR obligation, in preceding three years, is of Rs. 10 crore or more of their CSR projects having outlays of Rs. 1 crore or more, and which have been completed not less than one year before undertaking the impact study.

The CSR Committee shall review the progress reports received from the Company and Implementing Agencies. The CSR Committee shall satisfy the Board on the utilization of the funds disbursed for the purpose and in the manner approved by it.

The outcome of the impact assessment undertaken, and the progress reports submitted, will be taken into consideration while engaging the Implementation Agencies for subsequent CSR Programmes and while finalizing the annual action plan for the subsequent year.

The Company shall annex the impact assessment report to the Annual Report on CSR.

The Company undertaking impact assessment may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed 2% of the total CSR expenditure for that financial year or Rs. 50 lakh, whichever is higher.

CSR Reporting and Disclosure:

The CSR Committee of the Board, based on reports presented by the CSR Team, will annually publish a report on the CSR projects as a part of the Board's report, containing particulars as given in Annexure II of the Rules.

Detailed format for CSR reporting is given in Annexure B.

The Board of Directors of the Company shall mandatorily disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access

Penalty

If the Company is in default in complying with the provisions of section 135(5) or 135(6) of the Act, the Company shall be liable to a penalty of twice the amount required to be transferred by the Company to the Fund specified in Schedule VII or the Unspent Corporate Social Responsibility Account, as the case may be, or Rs. 1 crore, whichever is less, and every officer of the Company who is in default shall be liable to a penalty of 1/10th of the amount required to be transferred by the Company to such Fund specified in Schedule VII, or the Unspent Corporate Social Responsibility Account, as the case may be, or Rs. 2 lakh, whichever is less.

In case of non-compliance with any other provisions of the section or rules other than section 135(5) and 135(6) of the Act, the provisions of section 134(8) or general penalty under section 450 of the Act will be applicable. Further, in case of non-payment of penalty within the stipulated period, the provisions of section 454(8) will be applicable.

Amendments to the Policy

The Board of Directors on its own and/or on the recommendation of the CSR Committee can amend this policy as and when required.

Any amendments in the applicable laws, including any clarifications/ circulars of relevant regulators, if mandatory, shall be read with this Policy such that the Policy shall automatically reflect the contemporaneous applicable law at the time of its implementation.

Uploading of the Policy on Company's website

This CSR Policy and any amendments thereto shall be available on the website of the Company.

Annexure – A

- 1) Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water:
- 2) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- 3) 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;
- 4) 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- 5) 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:
- 6) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- 7) Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports;
- 8) Contribution to the Prime Minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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;
- 9) A) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

B) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and

Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

10) Rural development projects;

11) Slum area development.

The term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

12) Disaster management, including relief, rehabilitation and reconstruction activities.

Annexure - B

Format For the Annual Report on CSR Activities to be Included in the Board's Report

1. Brief outline on CSR Policy of the Company:
2. Composition of CSR Committee:

Sl. No.	Name of Director	Designation / Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year

3. Provide the web-link(s) where Composition of CSR Committee, CSR Policy and CSR Projects approved by the board are disclosed on the website of the company.
4. Provide the executive summary along with web-link(s) of Impact Assessment of CSR Projects carried out in pursuance of sub-rule (3) of rule 8, if applicable.
5.
 - (a) Average net profit of the company as per sub-section (5) of section 135.
 - (b) Two percent of average net profit of the company as per sub-section (5) of section 135.
 - (c) Surplus arising out of the CSR Projects or programmes or activities of the previous financial years.
 - (d) Amount required to be set-off for the financial year, if any.
 - (e) Total CSR obligation for the financial year [(b)+(c)-(d)].
6.
 - (a) Amount spent on CSR Projects (both Ongoing Project and other than Ongoing Project).
 - (b) Amount spent in Administrative Overheads.
 - (c) Amount spent on Impact Assessment, if applicable.
 - (d) Total amount spent for the Financial Year [(a)+(b)+(c)].
 - (e) CSR amount spent or unspent for the Financial Year:

Total Amount Spent for the Financial Year. (in Rs.)	Amount Unspent (in Rs.)				
	Total Amount transferred to Unspent CSR Account as per sub-section (6) of section 135.		Amount transferred to any fund specified under Schedule VII as per second proviso to sub-section (5) of section 135.		
	Amount	Date of transfer.	Name of the Fund	Amount.	Date of transfer.

(f) Excess amount for set-off, if any:

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	
(ii)	Total amount spent for the Financial Year	
(iii)	Excess amount spent for the Financial Year [(ii)-(i)]	
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous Financial Years, if any	
(v)	Amount available for set off in succeeding Financial Years [(iii)-(iv)]	

7. Details of Unspent Corporate Social Responsibility amount for the preceding three Financial Years:

1	2	3	4	5	6	7	8
Sl. No.	Preceding Financial Year(s)	Amount transferred to Unspent CSR Account under sub-section (6) of section 135 (in Rs.)	Balance Amount in Unspent CSR Account under sub-section (6) of section 135 (in Rs.)	Amount Spent in the Financial Year (in Rs)	Amount transferred to a Fund as specified under Schedule VII as per second proviso to sub-section (5) of section 135, if any	Amount remaining to be spent in succeeding Financial Years (in Rs)	Deficiency, if any
					Amount (in Rs) Date of Transfer		

1	FY-1							
2	FY-2							
3	FY-3							

8. Whether any capital assets have been created or acquired through Corporate Social Responsibility amount spent in the Financial Year:

☐ Yes ☐ No

If Yes, enter the number of Capital assets created/ acquired

Furnish the details relating to such asset(s) so created or acquired through Corporate Social Responsibility amount spent in the Financial Year:

Sl. No.	Short particulars of the property or asset(s) [including complete address and location of the property]	Pincode of the property or asset(s)	Date of creation	Amount of CSR amount spent	Details of entity/ Authority/ beneficiary of the registered owner		
(1)	(2)	(3)	(4)	(5)	(6)		
					CS R Registration Number, if applicable	Name	Registered address

(All the fields should be captured as appearing in the revenue record, flat no, house no, Municipal Office/Municipal Corporation/ Gram panchayat are to be specified and also the area of the immovable property as well as boundaries)

9. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per sub-section (5) of section 135.

Sd/- (Chief Executive Officer or Managing Director or Director).	Sd/- (Chairman CSR Committee).	Sd/- [Person specified under clause (d) of sub- section (1) of section 380] (Wherever applicable).”.
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