FINTELLIX
A Group ICRA Company

FINTELLIX
Corporate Social Responsibility Policy

DOCUMENT CONTROL

Document properties

Document name: Corporate Social Responsibility Policy

Document version: 1.0

Document owner: CSR team

Review frequency: Annually or need basis

Version history

Version	Adoption/ Amendment date	Effective date	Prepared by	Reviewed by	Approved by
1	February 27, 2026	February 27, 2026	CSR team	Corporate Social Responsibility Committee	Board of Directors

Table of Contents

CSR Mission 4
CSR Policy 5
1. Objective 5
2. Scope 5
3. CSR Intervention Areas 5
4. Board of Directors' Role 5
5. CSR Committee's Role 6
6. CSR Expenditure 6
7. Selection 7
8. Approach 8
9. Implementation 8
10. Monitoring 9
11. Annual Action Plan 9
12. Disclosure 10
13. Amendment to the Policy 10

CSR Mission

Fintellix envisions to make stronger communities and enrich the lives of underprivileged people through its programs that endeavor to:

- empower underprivileged youths and adults (with special focus on women) with employable skills, create livelihood opportunities for them so that they may contribute to the economic development of the society;
- promote education;
- support environment sustainability.

It may, however, undertake and support projects/programmes in the other areas as may be recommended by the Committee and approved by the Board of Directors if the same are permissible under Schedule VII of the Act or any other provisions of the Act and the Rules.

CSR Policy

1. Objective

In terms of Section 135 of the Companies Act, 2013 (the "**Act**"), and the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("**Rules**"), as amended from time to time, Fintellix India Private Limited (the "**Company**" or " **Fintellix**") has formulated Corporate Social Responsibility ("**CSR**") Policy (the "**Policy"**). This Policy shall act as a guideline for the Company for undertaking CSR activities in line with the Company's CSR Mission as stated in the Policy.

2. Scope

The Policy contains the approach and direction given by the Board of Directors of the Company ("**Board**" or "**Board of Directors**"), taking into account the recommendations of the CSR Committee of the Company (the "**Committee**"), and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the Annual Action Plan.

3. CSR Intervention Areas

As per the CSR Mission, Fintellix will focus on three intervention areas - education; skill development & livelihoods; and environment sustainability. All projects or programmes are aimed at improving the quality of life of the communities and environment.

4. Board of Directors' Role

The Board would constitute and/or reconstitute the Committee as may be considered necessary. In view of the Policy, the roles and responsibilities of the Board are as follows:

a) after due consideration, and if deemed advisable, shall approve of any changes or amendments to the Policy;
b) shall disclose the composition of the Committee, the Policy and details of the projects on the Company's website for public access;
c) shall consider the recommendations of the Committee and, if deemed advisable, shall approve the projects and allocation of funds;
d) shall ensure that the CSR activities be undertaken by the Company itself or through the Implementing Agencies;
e) shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by the Board, and the Chief Financial Officer of the Company or the person responsible for financial management shall certify to that effect;

f) shall ensure that the Company gives preference to the local area and areas around it where it operates; however, the Board may consider such area other than that stated above, as recommended by the Committee from time to time;
g) shall delegate the powers to the officials of the Company for timely compliance with the Act and the Rules;
h) in case of Ongoing Projects (as defined in Section 6 below), shall monitor the implementation of the projects with reference to the approved timelines and year-wise allocation and shall be making modifications, if required;
i) shall consider and, if deemed advisable, approve the Annual Action Plan recommended by the Committee and if required, may alter such plan at any time during the financial year with a reasonable justification as recommended by the Committee;
j) shall ensure that the Company endeavours to spend the CSR Expenditure (as defined in Section 6 below) in every financial year in pursuance to the Policy.

5. CSR Committee's Role

The roles and responsibilities of the Committee are as follows:

a) recommend any amendment to the Policy that is deem advisable to the Board;
b) formulate and recommend to the Board an Annual Action Plan (as defined in Section 11 below) in pursuance of the Policy;
c) monitor the implementation of the Policy from time to time and set up a transparent mechanism in relation to the same;
d) shall undertake impact assessment through an independent agency of any projects which are required under the Act or the Rules;
e) shall undertake such other duties and responsibilities as specified under the Act and the Rules, as amended; or the duties and responsibilities as approved by the Board of Directors, from time to time.

6. CSR Expenditure

The Company shall spend, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years, on CSR activities as stated in the CSR Mission of the Policy ("**CSR Expenditure**").

If the Company fails to spend the above-stated CSR Expenditure during any financial year, the Board shall ensure that the Company specify the reasons for not spending the said CSR Expenditure and, unless the unspent amount relates to Ongoing Projects, shall transfer such unspent amount to a prescribed fund specified in Schedule VII of the Act within a period of six months from the end of the previous financial year.

In case unspent amount relates to multiyear identified projects ("**Ongoing Projects**"), the Board shall ensure that the Company opens a special account in any scheduled bank under the name and style of 'Unspent Corporate Social Responsibility Account' and shall transfer the unspent amount into such account within 30 days from the end of the previous financial year; and such amount shall be spent by the Company within a period of three financial years from the date of such transfer. If the Company fails to do so, the said unspent amount shall be transferred to the fund specified in Schedule VII of the Act, within a period of thirty days from the end of the third financial year.

The administrative overheads shall not exceed five percent of total CSR Expenditure of the Company for the financial year.

If the Company spends an amount in excess of the CSR Expenditure in any financial year, the Board shall pass a resolution stating that such excess amount may be set off against the CSR Expenditure which is required to be spent in immediate three succeeding financial years.

If required, the CSR Expenditure will be spent by the Company for creation or acquisition of a capital asset, which will be held by:

i) Implementing Agencies, having charitable objective and CSR registration number or;
ii) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities or;
iii) a public authority.

Only projects, programmes or activities undertaken in India shall constitute CSR Expenditure except training of Indian sports personnel at national or international level.

7. Selection

The CSR projects or programmes are selected based on the Company's CSR Mission or as specified in Schedule VII to the Act, subject to the following exclusions as specified in the Rules:

a. the CSR projects or programmes or activities that are undertaken in pursuance of normal course of business of the Company shall not be considered as CSR activities.
b. contribution of any amount directly or indirectly to any political party under the provisions of the Act shall not be considered as CSR activity.
c. the CSR projects or programmes or activities benefitting employees of the Company shall not be considered as CSR activity.

d. any activity undertaken outside India except for training of Indian sports personnel at national level or international level shall not be considered as CSR activities.
e. the activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services shall not be considered as CSR activities.
f. activities for fulfilment of any other statutory obligations under any law in force in India shall not be considered under CSR activities.

8. Approach

Fintellix's approach to CSR lies in time bound, strategic, result oriented, and professionally driven development initiatives/solutions for inclusive growth and development of all, based on the principles of equality and justice. Fintellix believes in investing in long term development models that are replicable, sustainable and effective to address the various social needs and problems of our society. Fintellix will also engage with its employees to encourage and motivate them to contribute for the development of society by volunteering with the causes of their interests.

9. Implementation

CSR activities may be implemented by the Company through the implementing agencies ("**Implementing Agencies**"). The Implementing Agencies shall meet the eligibility criteria as specified in the Act and the Rules made thereunder.

The Implementing Agencies shall be duly registered with the Central Government and will have a unique CSR registration number.

A proper due diligence mechanism is followed for selecting an Implementing Agency. Such due diligence may *inter alia* cover aspects of:

i. Financial position and credibility;
ii. History and experience;
iii. Governance and management standards;
iv. Conflict of interest;
v. Statutory registrations; and
vi. Existing and past litigations.

Post that the Committee recommends to the Board for onboarding the said Implementing Agency.

Funds would be disbursed either in tranches or as one-time payment. The terms, conditions and timing of disbursement would be conditional upon the nature and

requirement of the CSR project or programme and will be highlighted in the memorandum of understanding/agreement between the Company and Implementing Agency.

The Company may collaborate with other companies for undertaking projects or programmes or CSR activities provided that the Committee and the committees of respective companies are able to report separately on such projects or programmes in accordance with the Act.

Fintellix may engage international organizations for designing, monitoring and evaluation of the CSR projects or programmes as per this Policy as well as for capacity building of the Company's own personnel for CSR.

10. Monitoring

The Committee shall ensure a transparent monitoring mechanism for implementation of the activities undertaken under this Policy. The monitoring mechanism includes periodic reporting and periodic review of CSR projects or programmes.

i. Periodic reporting: The Implementing Agencies will be required to submit projects or programmes' fund utilization statement, financial statements, etc., on a periodic basis;
ii. Periodic review: On-site visit, calls with beneficiaries, review calls with the Implementing Agencies, to assess the project implementation including key milestones or key performance indicator, fund utilization, etc.

The Committee and the Board shall review the progress of CSR activities at least once a year.

As required under the Act, the CSR projects or programmes may undergo impact assessment through third party.

11. Annual Action Plan

The annual action plan of the Company ("**Annual Action Plan**") shall mainly consist of:

a) a list of projects or programmes that are approved to be undertaken in areas or subjects in line with the Company's CSR Mission;
b) manner of execution of such projects or programmes;
c) modalities of utilization of funds and implementation schedules for the projects or programmes;
d) monitoring and reporting mechanism for the projects or programmes;

e) details of need and impact assessment, if any, for the projects undertaken by the Company itself or through Implementing Agencies.

The Board may alter such plan at any time during the financial year, as per the recommendation of the Committee, based on the reasonable justification to that effect.

12. Disclosure

The Company shall make the following disclosure as specified in the Act and the Rule:

a) disclose all the applicable information in annual CSR/Board's report as per the format specified under the Act and/or the Rule;
b) disclose this Policy on the website of the Company;
c) disclose the composition of the Committee on the website of the Company; and
d) disclose the projects approved by the Board on the website of the Company.

13. Amendment to the Policy

In case of any subsequent changes in the provisions of the Act or the rules made thereunder or any other regulations which make any of the provisions of this Policy inconsistent with the Act or the Regulations, then the provisions of the Act or the Regulations would prevail over this Policy and the relevant provisions contained in this Policy would be modified accordingly in due course to make same consistent with applicable laws.

The Board on its own and/or as per the recommendations of the Committee may, subject to applicable laws, amend, suspend or rescind this Policy at any time. Any difficulties or ambiguities in this Policy will be resolved by the Board in line with the broad intent of this Policy.

****