

### **Policy Statement on Corporate Social Responsibility**

#### **Preamble:**

Infina Finance Private Ltd ("Company/ Infina") believes in positively contributing to the economic, environmental and social well-being of communities through Corporate Social Responsibility (CSR) agenda.

This Policy is to bring out the Vision and Mission and governance for implementation of the CSR Policy for Infina Finance Pvt. Ltd

#### **Vision:**

To improve the quality of life of communities through positive impact on economic, social and environmental parameters and in alignment with India's social development objectives and UN's SDGs. The company intends to positively contribute to social, economic, environmental, educational and medical, healthcare needs of various needy sections of the Indian Society and Key Focus area being Healthcare, Education & Livelihood, Sports, Environment & Sustainable Development, Relief & Rehabilitation.

#### **Mission:**

To create a lasting value for communities in need by promoting and supporting education, livelihood, healthcare, sports and environmental and sustainable development initiatives and others including to reduce inequalities faced by socially and economically backward groups, relief and rehabilitation, and intervention towards an educated, employed, healthier and a cleaner India, with an aim to serve communities at large and to transform their lives, in a collaborative manner by working with internal and external stakeholders.

#### **Governance:**

The Board of the Company has established a Board level Corporate Social Responsibility Committee which will be responsible to monitor, review and approve CSR initiatives and expenditure undertaken by the Company in pursuance of its CSR obligations.

#### **Scope of CSR Policy**

The scope of CSR activity shall be within the scope of the CSR mandate as specified under Sections 134(3)(o) and 135 read with Schedule VII of the Act, the CSR Rules, 2014, as amended from time to time and as per the Government of India's notifications issued from time to time. CSR Projects would be guided by the applicable regulations and would seek to achieve social objectives and impact as envisaged in the CSR mission.

Provided that the CSR activities undertaken by Company, as stated above, shall not include the following:

- a) Activities undertaken in pursuance of normal course of business of the Company.
- b) Activities 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 an International level;
- c) Contribution of any amount directly or indirectly to any political party under Section 182 of the Act;
- d) Activities benefitting employees of the Company as defined in Clause (k) of Section 2 of the Code on Wages, 2019;
- e) Activities supported by the Company on sponsorship bases for deriving marketing benefits for its products or services.
- f) Activities carried out for fulfillment of any other statutory obligations under any law in force in India.

### **Statement of commitment & implementation of CSR activities**

- a) Over and above the normal course of business, Infina Finance Pvt. Ltd at all times is committed to actively contribute to the social and economic development of the society at large. The objective of the policy is to:
- b) Interact with various non-profit making organisations established for the purpose of promoting education in order to improve the lives of the community.
- c) Support Organizations and Institutions which are created to promote the girl child or engaged in the welfare or empowerment of women.
- d) Participate or /and Contribute towards the development of Old Age Homes or Orphanages.
- e) Volunteer in programmes developed to help the poor, providing for food and clothing for the needy and promote and support activities intended for upliftment of the lesser privileged class of society.
- f) Will Aid in providing and supporting charitable organisations involved in providing medical and hospitalisation facilities for the poor and needy sections.
- g) Rural development projects.
- h) Ensuring environmental sustainability
- i) Enhancement of the accessibility and affordability of quality education for deserving underserved sections of society, focus on providing financial and other resources support to schools including infrastructure, scholarships and coaching to deserving children, parents,

teachers, headmasters, principals and administrators to provide holistic learning environment for children at school and home including providing mid-day meals and other required nutrition and health related support.

- j) Collaborate with governmental agencies, non-governmental agencies (“NGOs”) and/or other institutions to collectively deliver the community development initiatives and support such agencies and institutions with appropriate and necessary resources.
- k) Conducting Projects and programmes directly and/or through implementing agency working in the healthcare and sanitation domain, including but not limited to improving access to healthcare facilities by providing ambulances, screening vans and mobile health units, cancer care and treatment, pediatric healthcare etc.
- l) Conducting Projects and programmes that engage with the community for long-term rehabilitation solutions including but not limited to focusing on livelihood enhancement, skill development, providing shelter and infrastructure for education and health services to achieve rapid and effective recovery.
- m) Support to rural sports, nationally recognized sports, Paralympic sports and Olympic sports including the training and development of sportsmen.
- n) Activities related to financial assistance, technology transfer, technical assistance, field trials, imparting education, promoting awareness and such other interventions that would diversify and intensify practices in conducting research and development in the areas or subjects specified in Schedule VII of the Act.
- o) Areas or activities specified under Schedule VII of the Act

### **Direct CSR Projects**

CSR Projects undertaken, executed and implemented by Company itself under its Direct CSR Projects may include engagement and involvement of all stakeholders including employees, across Indian geography, and for the purpose of implementation and monitoring, Company may also engage third party organisations / consultants etc. However, for Company’s Direct CSR Projects, the onus of responsibility on implementing and monitoring rests with the Company.

### **Implementing Agencies**

CSR Project Implementing Agency in the CSR context means Infina directly indirectly engaging an NGO to implement its CSR Projects i.e., Infina’s CSR Projects funded by it, thus, Infina is the CSR funding organisation, and the project is implemented by / through the implementing agency. Further, it is clarified that Infina’s responsibility and liability is restricted to impact outcomes of its CSR Projects only and in no manner will Infina be responsible or held liable for any acts of omission and commission, and such other civil and criminal liabilities of its implementing agencies.

The Board shall ensure that the CSR activities are undertaken by Infina directly or through any of the entities registered with the Central Government under the CSR Rules including:

- 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 Sections 12A and 80 G of the Income Tax Act, 1961, established by the company, either singly or along with any other company: or
- 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; or
- c) Any entity established under an Act of Parliament or a State legislature; or
- 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 Sections 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three (3) years in undertaking similar activities.

### Engagement of International Organisations

“International Organisation” means an organisation as defined under Rule 2(g) of the CSR Rules, 2014. Company may engage International Organisation(s) for designing, monitoring and evaluation of the CSR projects or programmes as well as for capacity building of its personnel for CSR.

### CSR Project Expenditure / CSR Funds

The Board shall ensure that in every financial year, Infina spends at least two (2) % of its average net profits made during the three (3) immediately preceding financial years in pursuance to the provisions of this CSR Policy and in accordance with Section 135 read with Schedule VII of the Act and CSR Rules, 2014, as amended from time to time.

For any CSR funds that remain unspent pursuant to an Ongoing Project, Infina shall transfer such unspent CSR funds to its Unspent Corporate Social Responsibility Account, within 30 (thirty) days from the end of the Financial Year. Such unspent CSR funds shall then be spent in accordance with the terms of this CSR Policy, within a period of three (3) Financial Years from the date of such transfer, failing which, Infina shall transfer the same to a Fund specified in Schedule VII of the Act, within a period of thirty (30) days from the date of completion of the third financial year.

As per the applicable law, such Unspent CSR funds, pertaining to Ongoing CSR Projects for the Financial Year, which are transferred to Unspent Corporate Social Responsibility Account will be considered as part of the 2% prescribed CSR requirement for the Financial Year.

For any unspent CSR funds that do not relate to any Ongoing Project, such unspent funds shall be transferred to the Fund specified under Schedule VII of the Act, within a period of six (6) months of the expiry of the financial year.

In case Infina's CSR spends is less than two (2) % of its average net profits made during the three (3) immediately preceding financial years, the Board in its report made under Section 134(3)(o) of the Act, shall specify the reasons for not spending the said amount.

Any surplus arising out of the CSR activities carried on by Infina, shall not comprise of the business profit of Infina and shall be dealt with in the following manner:

- a) Surplus to be ploughed back either into the same CSR project and/or programme; or
- b) Surplus to be transferred to the Unspent CSR Account and spent in pursuance of this CSR Policy and the annual action plan of Infina; or
- c) Surplus to be transferred to a Fund specified under Schedule VII of the Act;

within a period of 6 (Six) months of the expiry of the financial year.

In the event that Infina spends an amount in excess of the requirement provided under Section 135(5) of the Act, such excess amount may be set-off against the requirement to spend under Section 135(5) of the Act, up to immediate succeeding three (3) financial years subject to the conditions that such excess amount shall not include surplus arising out of the CSR activities and the Board shall pass a resolution to that effect.

The CSR funds may also be utilized for creation or acquisition of capital asset, to be held by either the beneficiaries of the CSR project such as entities, collectives or self-help groups; a public authority; or a company incorporated under Section 8 of the Act or a registered public trust, registered society with a charitable objective and a CSR registration number.

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

### **CSR Reporting**

The Board's report pertaining to any Financial Year containing details of the CSR initiatives taken during such Financial Year, would include an annual report on CSR in the form and manner prescribed under Section 135 read with Schedule VII of the Act read along with the CSR Rules, 2014 as amended from time to time and in line with the Government of India's notifications issued from time to time.

### **CSR Impact Assessment**

Where in any Financial Year, Infina has an average CSR obligation of Rupees Ten crore or more, Infina shall undertake impact assessment of its CSR projects and/or programmes having outlays of Rupees One (1) crore or more and which have been completed not less than one (1) year before undertaking the impact assessment, through an independent agency. The impact assessment reports shall be placed before the Board and also annexed to the annual report on CSR. The impact assessment expenditure in any financial year shall not exceed the limit prescribed under the CSR Rules, 2014 as amended from time to time.

### **CSR Administrative Overheads Expenses**

As per the provisions of the CSR Rules the Board shall ensure that the administrative overheads (the definition has been set out below) shall not exceed five percent of total CSR expenditure of Infina for the financial year.

### **Meaning and scope of ‘Administrative Overheads’ for CSR as defined under the CSR Rules, 2014**

*“Administrative overheads” means the expenses as defined under Rule 2(b) of the CSR Rules, 2014, as amended from time to time*

### **Governance Framework**

Infina has an established CSR Committee which is responsible for the overall governance of CSR. The CSR Committee comprises of three (3) or more directors.

While the CSR Committee will be responsible to review and approve the projects/programmes under Infina’s CSR Policy (and the approved annual action plan), Infina’s CSR head and his/her team will be responsible for execution of CSR Projects / Programmes, which at all times will be within the scope of Infina’s CSR policy, the annual action plan, and the Act.

The CSR Committee will also be responsible for formulating an annual action plan in consonance with this CSR policy and recommending such annual action plan to the Board. The annual action plan shall include the following information:

- a) A list of CSR projects or programmes that are approved to be undertaken by Infina or subjects specified in Schedule VII of the Act;
- b) The manner of execution of such CSR projects and programmes.
- c) The modalities of utilization 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 Infina

Based on the recommendations of the CSR Committee and reasonable justification, the Board shall approve the Annual Action Plan for Infina and have the right to alter such annual action plan at any time during a Financial Year.

### **Information Dissemination**

- 1. Appropriate documentation of Infina’s CSR Policy, annual CSR activities, implementing agencies, and expenditure entailed will be undertaken on a regular basis and the same will be available in the public domain.
  2. CSR initiatives of Infina will also be reported in the Annual Report of Infina.
  3. This CSR Policy shall be uploaded on Infina’s website for information of all stakeholders.

### **Boundary**

While Infina will endeavor to implement its projects and programs in and around the geographies where it carries its business and operations, Infina may also implement its CSR programs and/or projects either directly or with implementing agencies in any geography but within India to serve and support the needy people and/or towards nation building.

### **Monitoring and Review:**

The CSR of the Board of Directors will ensure a transparent monitoring mechanism for ensuring effective implementation of the projects / programs/ activities proposed to be undertaken by Infina in pursuance of its CSR obligations.

In order to achieve the desired outcomes in a transparent manner in compliance with the applicable legal provisions, the CSR initiatives will be implemented, monitored regularly and the same will be reviewed by the CSR Committee at regular intervals.

Midcourse actions will be taken wherever necessary.

### **Law to take precedence and Amendments:**

In the event of any variation or inconsistency between the provisions of this Policy and applicable law, the provisions of the applicable law shall prevail over this Policy and the provisions of this Policy shall be deemed to have been amended to be read in consonance with such applicable law.

For Further information, write to [info@infina.in](mailto:info@infina.in)

## INDEX OF THE REVIEW OF THE POLICY

Sr. No.	Date of the Review
1	April 18, 2019
2	May 28, 2020
3	March 31, 2022
4	November 29, 2022
5.	December 18, 2023
6.	May 13, 2024
7.	November 22, 2024