

**REGISTERED ADDRESS**

Unit No. DPT-324, 3rd Floor,  
DLF Prime Towers,  
Plot No. F-79-80, Okhla  
Industrial Area, Phase -I,  
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**CORPORATE ADDRESS**

Tower 8A, 4th Floor  
Building No 8, DLF Cyber City,  
Phase-II Gurugram, 122002,  
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**TRILLIONLOANS FINTECH PRIVATE LIMITED**  
**CORPORATE SOCIAL RESPONSIBILITY POLICY**

<b>Policy Name</b>	Corporate Social Responsibility Policy
<b>Issue and Effective Date</b>	19 March 2025
<b>Prepared By</b>	Compliance Department
<b>Version</b>	1.0
<b>Approved by</b>	Board of Directors at Board meeting held on 19 March 2025

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## **I. PRELUDE AND LEGAL FRAMEWORK:**

The Companies Act, 2013 (the “**Act**”) has made it mandatory for certain companies to carry out its corporate social responsibility activities in accordance with Section 135 of the Act read with Schedule VII of the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (“**CSR Policy Rules**”). In order to comply with the requirements of the law, the Board of Directors (the “**Board**”) of Trillionloans Fintech Private Limited (the “**Company**”) has adopted the following Corporate Social Responsibility Policy (the “**Policy**”) and procedures with regard to the Company’s social responsibility:

### **1) Corporate Social Responsibility Philosophy and Objective:**

The Company strives to be a socially responsible company and strongly believes in development which is beneficial for the society at large as a part of its Corporate Social Responsibility (“**CSR**”). Through the CSR program, the Company sets the goal of reaching a balance that integrates human, environmental and community resources. By means of integrating and embedding CSR into its business operation and participating proactively in CSR initiatives, the Company intends to contribute continuously to the global sustainable development. The objective of this Policy is to set guiding principles for carrying out CSR activities by the Company and also to set up process of execution, implementation and monitoring of the CSR activities to be undertaken by the Company.

### **2) Applicability**

A company satisfying any of the following criteria during the immediately preceding financial year is required to comply with CSR provisions specified under Section 135(1) of the Act read with the CSR Policy Rules made thereunder:

- (i) net worth of rupees five hundred crore or more, or
- (ii) turnover of rupees one thousand crore or more, or
- (iii) net profit of rupees five crore or more.

## **II. CSR ACTIVITIES:**

1. The Company shall undertake any of the following projects or programs or activities as prescribed under the Schedule VII of the Act as amended from time to time. An illustrative list

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of such areas or subjects is outlined below:

- i. Eradicating hunger, poverty and malnutrition, promoting health care, 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.
- 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
- 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, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows.
- vii. Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports.
- viii. 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.

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- ix. 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
  - x. 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)
  - xi. Rural development projects.
  - xii. Slum area development.
  - xiii. (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)
  - xiv. Disaster management, including relief, rehabilitation and reconstruction activities.
  - xv. All other activities which form part of CSR as per Schedule VII of the Act and the rules made thereunder as amended from time to time.
2. The Company shall give preference to the local area and areas around its registered office, corporate office, regional offices, branch offices and franchisee offices, for spending the amount earmarked for CSR activities.

**3. Exclusions:**

**The following activities shall not be considered as CSR activities:**

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- i. Activities undertaken in pursuance of the Company's normal course of business.
- ii. Activities undertaken outside India except training of Indian sports personnel outside India who is representing any State or Union Territory at national level or India at international level.
- iii. Activities that benefit the employees of the Company and their families.
- iv. Contribution of any amount directly or indirectly to any political party under section 182 of the Act.
- v. Activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services.
- vi. One-off events such as marathons/ awards/ charitable contribution/ advertisement/sponsorships of TV programmes etc.
- vii. Activities carried out for fulfilment of any other statutory obligations under any law in force in India.

The surplus, if any, arising out of the CSR projects/ programmes/ activities shall not form part of the business profit of the Company.

### **III. GOVERNANCE**

The CSR Governance structure at the Company comprises of a CSR Committee (if applicable) and the Board of Directors of the Company.

The CSR Committee formation is not mandatory where the amount required to be spent by a company on CSR does not exceed fifty lakh rupees and the functions of the CSR Committee, in such cases, shall be discharged by the Board of Directors of the company.

The CSR Committee of the Company, if become applicable, shall consist of minimum three or more Directors, out of which atleast one director shall be an Independent Director. The Company Secretary shall act as the Secretary to the Committee.

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Provided that where a company is not required to appoint an independent director it shall have in its Corporate Social Responsibility Committee two or more Directors.

## **Functions/ Roles and Responsibilities of Board of Directors**

- To monitor and review of the performance and impact of the CSR programmes, provide input and course corrections if required and satisfy itself that the CSR funds so disbursed are aligned to the CSR Policy of the Company and have been utilized for the purposes and in the manner as approved by the Board.
- The CFO/or the person responsible for financial management shall certify to the fact that CSR funds so disbursed have been utilised for the purposes and in the manner approved by the Board.
- To monitor the CSR policy of the Company from time to time.
- To formulate an annual action plan as per the provisions of the Act.
- To carry out any alteration in the annual action plan at any time during the year and update, if required, the CSR Policy outlining the following;
  - the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
  - the manner of execution of such projects or programmes;
  - the modalities of utilisation of funds and implementation schedules for the projects or programmes;
  - monitoring and reporting mechanism for the projects or programmes; and
  - details of need and impact assessment, if any, for the projects undertaken by the Company.
- To implement and monitor the CSR activities as per the annual action plan.
- To identify projects of the Company as ‘Ongoing Projects’ as per the provisions of the Act.

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- To approve annual CSR expenditure budget with details of projects or activities proposed to be undertaken.
- To undertake impact assessment through third parties for CSR projects whenever applicable.
- To ensure implementation of CSR activities of the Company within the applicable framework.
- To determine the overall scope of, provide input on, prepare and approve the CSR report of the Company;
- To perform such other functions as may be necessary under any statutory or other regulatory requirements to be performed by the Board from time to time.

#### **IV. FUNDING, SELECTION, IMPLEMENTATION AND MONITORING AND THEIR GUIDING PRINCIPLES:**

##### **A. Funding obligation:**

The Board of the Company to ensure that 2% of average net profits during the three immediately preceding financial years is spent on CSR initiatives undertaken by Company. If Company spends any amount over and above such 2% of average net profits, the same is to be considered as excess CSR expenditure which can be set-off in the immediate succeeding three financial years subject to the conditions as prescribed under the Act.

In order to compute whether the Company has under spent or over spent the CSR funds, the following shall be considered:

- a. **Project Cost** – it shall include designing, implementation, monitoring and evaluation cost incurred directly or indirectly on the project
- b. **Administrative Overheads** – to ensure that such expenses shall not exceed 5% of the total CSR expenditure of the company for the financial year. Further, these expenses would not include expenses incurred by the Company towards designing, implementation, monitoring



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and evaluation

**B. Selection of implementing agency:**

The guiding principles for selection of implementing mode and agency, where applicable, are:

- a. **Eligibility** - Statutory eligibility of implementing agency through which the CSR activities are selected, i.e. to ensure whether those implementing agencies have registered under Section 12A and 80G of the Income Tax Act, 1961, have an established track record of at least three years in undertaking similar activities and have also filed form CSR-1 with the Registrar of Companies.
- b. **Sustainability** - Implementing agency has a track record of 3 years in undertaking similar programs or projects.
- c. **Goodwill** – Implementing agency shall have a goodwill in performing its activities diligently.
- d. **Law of land** – Implementing agency shall have a good stand in terms of Law of Land.

**C. Implementation & Monitoring:**
**i. Implementation:**

The projects and programs covered under the CSR activities of the Company may be undertaken by the company itself or through:

- 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; 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 section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking

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similar activities.

*Note: 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.*

Accordingly, such other entity will work closely with and support the Board and the CSR Committee (if applicable) in implementing CSR activities of the Company. Such other entity will assist the CSR Committee/ Board in identifying the areas of CSR activities, programs and execution of initiatives as per defined guidelines. Such other entity will also assist the Board / the CSR Committee in reporting the progress of deployed initiatives and in making appropriate disclosures (internal/external) on a periodic basis.

The Board shall ensure that the entity is registered with the Central Government and has filed form CSR-1 electronically with the Registrar.

## ii. **Monitoring:**

### **Impact Assessment –**

- In the event of average CSR obligation of Rs. 10 crores or more in the three immediately preceding financial years, the Company shall ensure that impact assessment through an independent agency is carried out for CSR projects having an outlay of Rs. 1 Crore or more. Expenditure incurred for such assessment shall not exceed 2% of the total CSR expenditure for the financial year or 50 lakh rupees, whichever is higher.
- The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR. Further, the company shall appoint the impact assessment agency.
- Monitoring will be done with the help of identified key qualitative and quantitative performance indicators, with a continuous feedback mechanism, and recourse for mid-course correction in implementation, if needed, to ensure efficacy.
- Assessment of utilisation of funds will also be done on a quarterly basis, along with submission of an annual consolidated utilisation which will be part of the Company’s Annual Report. This will include a rationale for shortfall or surplus of funds.
- All expenditure towards the programs to be diligently documented. In case 2% of average

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net profit of the last 3 years is not spent in a financial year, reasons for the same to be specified in the CSR report.

- The surplus from the allocated CSR budget will not be utilized for business or form part of business profits.
- All activities will be undertaken in project mode with defined objectives and deliverables, clarity on target beneficiaries, implementation plans with schedule of timeline agreed prior to commencement of activities.

The CSR Committee/ Board will be responsible for:

- 1) monitoring and regularly reporting the CSR activities undertaken;
- 2) providing guidance in implementation of CSR activities;
- 3) establishing a mechanism for undertaking CSR activities including site visits, meetings, progress reporting, obtaining monitoring reports from organizations receiving the funds for the Company's CSR activities and ensuring receipt of information in relation to CSR activities;
- 4) ensure documentation of CSR activities, reports on execution and expenditures will be undertaken on a regular basis and same will be available to the Board of the Company.
- 5) the management of the Company will provide to the CSR Committee/Board appropriate details of the proposed projects including implementation years, modalities of execution in the areas chosen etc.;
- 6) the CSR Committee/Board may empower the managing director or chief financial officer or any other person to spend such amounts towards CSR activities. Any amount spent beyond the prescribed limit for CSR activities shall be ratified by the CSR Committee/Board in the next meeting of the CSR Committee and shall be reported to the Board of the Company from time to time.
- 7) the CSR Committee/Board will conduct due diligence checks on the current projects on a regular basis and report anomalies, if any, immediately.

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The modalities of execution of CSR activities and the implementation schedule shall be determined by the Board from time to time, in accordance with law.

**D. Guiding Principles for Implementation and Monitoring:**

- a. Accountability and Transparency – Implementing agency shall be accountable for all expenses along with the acknowledgements. Further, there should be transparency in the actions to protect the interest of all the stakeholders.
- b. Ethical Behaviour – Management and Implementing agency shall maintain ethical behaviour while implementing and monitoring CSR programs without any corruption.
- c. No conflict of interest - There shall not be any conflict of interest in the objectives of employees involved in CSR activities and the implementing agencies. Both of them should work for benefits of the needy.
- d. Respect for stakeholder's interest - While identifying CSR programs, interest of all the stakeholders shall be taken into consideration.
- e. Feedback - Monitoring will be done in project mode with continuous feedback mechanism, and recourse will always be available for mid-course correction in implementation, whenever required.

**E. Guiding Principles for Annual Action Plan:**

The Board/ CSR Committee shall prepare an Annual Action plan of the Company to identify the activities and the CSR expenditure to be spent during the year which shall include the details as mentioned in the rules.

Further, the guiding principles required to formulate the Annual Action Plan are as follows:

- a) CSR programs shall not include activities as restricted under the amended CSR Rules.
- b) The preference for CSR programs is to be given to local areas and areas around its operations.
- c) The CSR activities may be carried out directly or through implementing agency(ies).
- d) Payments to implementing agencies or to vendors should be milestone based.

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- e) All the guiding principles as required to be followed for implementing and monitoring the CSR Activities shall also be followed while formulating the Annual Action Plan.
- f) Action plan shall be Simple, Action oriented, Measurable, Relevant and Time Bound.

During any financial year, the Annual Action Plan of the Company may be modified to include any unbudgeted expenditure, either on account of new project(s) or due to increase in the outlay for approved project(s), as per the recommendation of its CSR Committee/ Board, based on the reasonable justification to that effect.

Subject to the provisions of the Act, the Company may also utilize its CSR spend towards creation or acquisition of a capital asset.

## **V. DISCLOSURES**

All relevant disclosures required to be made in the Annual Report and on the website of the Company in relation to CSR including the details of the CSR Policy, the CSR Committee (if applicable), the CSR activities undertaken by the Company, the CSR expenditure during the relevant financial year and other information as may be required under law, Section 135 and Schedule VII of the Act, CSR Policy Rules and any other applicable law shall be complied with.

## **VI. REVIEW & AMENDMENT OF THE POLICY**

The CSR Committee shall review the CSR Policy from time to time based on the changing needs and make suitable modifications as may be necessary with the approval of the Board.

In case of any amendment(s), clarification(s), circular(s), FAQs etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), FAQs etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

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