



## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

**KFin Technologies Limited**

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### SIGNATORIES

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Ms. Alpana Kundu (Company Secretary)	Mr. Vivek Mathur (Chief Financial Officer)	CSR Committee	Board
<b>Mr. Anshul Kumar Jain,</b> Chief Compliance Officer and Head - Legal	<b>Mr. Vivek Narayan Mathur,</b> Chief Financial Officer	CSR Committee	Board of Directors

### VERSION CONTROL

Date	Description	Description of Changes
February 21 2019	Corporate Social Responsibility (CSR) Policy	New Policy
March 05, 2021	Corporate Social Responsibility (CSR) Policy	Amendment in Policy as per MCA Notification
June 06, 2022	Corporate Social Responsibility Policy	Amendment in Policy pursuant to MCA's FAQ and the Company's listing

## 1. PREAMBLE

KFin Technologies Limited (“**KFintech**” or “**the Company**”) through the recommendations made by the Corporate Social Responsibility Committee (“**CSR Committee**”) has developed a Corporate Social Responsibility Policy (“**CSR Policy**”) in alignment with its objective, principles and values, for delineating its responsibility as a socially and environmentally responsible corporate citizen. This CSR Policy lays down the principles and mechanisms for undertaking various programs in accordance with the Act (*as defined below*) and the rules thereunder.

It is the Company’s philosophy, firm belief and intent to effectively implement Corporate Social Responsibility (“**CSR**”) and make a positive difference to society. It recognizes that it cannot do it all; so it is likely that there are choices to be made, which will be towards doing fewer projects with better outcomes and good impact and will focus initiatives on communities located in the areas in which the Company lives, operates and particularly, forms a community whose development is the basic mission of the Company. The Company shall ensure that its CSR initiatives are aligned with national interest and undertaken in accordance with the provisions of law at all times and the Company endeavors to further sustainable development goals in its CSR projects.

This Policy shall be read in line with Section 135 of the Act (*as defined below*), Companies (Corporate Social Responsibility Policy) Rules, 2014 (“**CSR Rules**”), the General Circular No. 14/2021 on “*Frequently Asked Questions on Corporate Social Responsibility (CSR) – reg*” dated August 25, 2021, issued by the Ministry of Corporate Affairs and such other rules, regulations, circulars, and notifications as may be applicable and as amended from time to time.

## 2. DEFINITIONS

- (a) “**Act**” means the Companies Act, 2013 (18 of 2013);
- (b) “**Administrative Overheads**” has the following meaning and scope ascribed to it:
  - (i) 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 including expenditure incurred on impact assessment;
  - (ii) administrative overheads generally comprise items such as employee costs, utilities, office supplies, legal expenses, etc;
  - (iii) expenses which are attributed to the project implementation shall be included in project cost only. For example, salary and training for the employees working in the CSR division of a company, stationery cost, travelling expenses, etc. may be categorised as administrative overheads. However, salary of school teachers or other staff, etc. for education-related CSR projects shall be covered under education project cost; and
  - (iv) expenses incurred by Implementing Agencies (*Defined hereinafter*) on the management of CSR projects shall not amount to administrative overheads.
- (c) “**Board**” means the Board of Directors of the Company, as duly appointed.

- (d) **“Board’s Report”** means the report by the Board of the Company made pursuant to Section 134 of the Act;
- (e) **“Corporate Social Responsibility (CSR)”** 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 CSR rules, but shall not include the following, namely:-
- (i) activities undertaken in pursuance of normal course of business of the Company:
- Provided that if the Company is engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business, it may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that-
- a. such research and development activities shall be carried out in collaboration with any of the institutes or organisations mentioned in item (ix) of Schedule VII to the Act;
- b. details of such activity shall be disclosed separately in the Annual report on CSR included in the Board’s Report;
- (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 clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
- Explanation: Any activity which is not designed to benefit employees solely, but the public at large, and if the employees and their family members are incidental beneficiaries, then, such activity would not be considered as “activity benefitting employees” and will qualify as an eligible CSR activity.
- (v) activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- Explanation: It is clarified that CSR may not be used purely as a marketing or brand building tool for business, but brand building as a collateral benefit does not vitiate the spirit of CSR.
- (vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India;
- (f) **“CSR Committee”** means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act;
- (g) **“CSR Policy”** means this CSR Policy and includes guiding principles for selection,

implementation and monitoring of activities as well as formulation of the annual action plan;

- (h) “**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 (46 of 1947), to which the provisions of the Schedule to the said Act apply;
- (i) “**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.

Net Profit maybe calculated in accordance with Section 198 of the Act. Profit before Tax is used for computing net profit under Section 135 of the Act.

- (j) “**Ongoing Project**” means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding 3 (three) years excluding the financial year in which it was commenced, and which shall include such projects that were initially not approved as multi-year projects but whose duration has been extended beyond 1 (one) year by the Board based on reasonable justification. The project should have been commenced within the financial year to be termed as “ongoing”. An ongoing project shall have ‘commenced’ when the company has either issued the work order pertaining to the project or awarded the contract for execution of the project. It maybe noted that the time period of an ongoing project shall not be extended beyond its permissible limit.
- (k) “**Public Authority**” means ‘Public Authority’ as defined in clause (h) of section 2 of the Right to Information Act, 2005 (22 of 2005);
- (l) “**Registered Public Trust**” (as referred to in Rule 4(1) of the CSR Rules) would include trusts registered under the Income Tax Act, 1961 in respect of those states where registration of public trusts is not mandatory.
- (m) “**Surplus**” refers to income generated from the spend on CSR projects, e.g., interest income earned by the implementing agency on funds provided under CSR, revenue received from the CSR projects, disposal/sale of materials used in CSR projects, and other similar income sources.

Words and expressions used and not defined in this Policy but defined in the Act and/or rules, circulars, notifications etc. shall have the same meanings respectively assigned to them in the Act or rules, circulars, notifications etc.

### 3. SCOPE AND APPLICABILITY

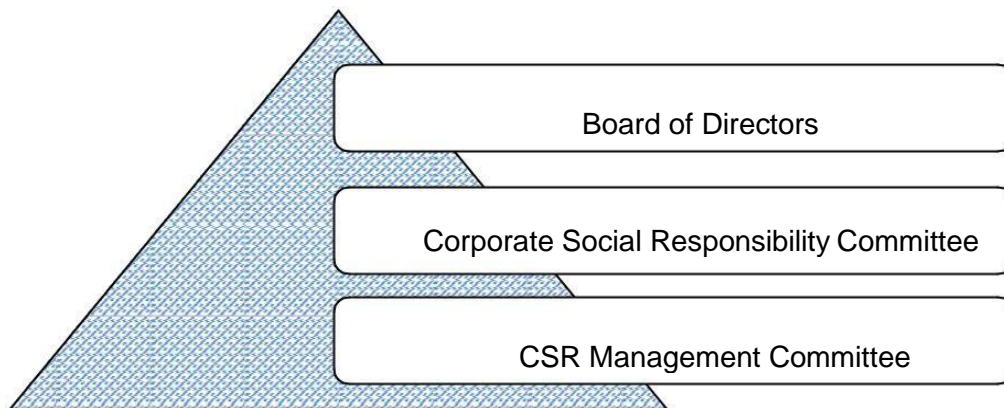
This Policy shall be applicable to all CSR initiatives and activities undertaken by the Company either directly or through entities as mentioned in Rule 4 of the CSR Rules for the benefit of different segments of the society.

#### 4. OBJECTIVE OF CSR POLICY

The objective of this CSR Policy is to continuously and consistently:

- a. Recognize and frame the segments the Company towards achieving its CSR objectives;
- b. Formulate the modus operandi of the CSR projects and implementation of the processes;
- c. Initiate projects that benefit communities;
- d. Encourage an increased commitment from employees towards CSR projects and volunteering;
- e. Generate goodwill in communities where the Company operates or is likely to operate.

#### 5. GOVERNANCE STRUCTURE



- a. Section 135 of the Act mandates every company having a net worth of Rs. 500 Crores or more or turnover of Rs. 1,000 Crores or more or net profit of Rs. 5 Crores or more during the immediately preceding financial year to constitute a Corporate Social Responsibility (CSR) Committee.
- b. The CSR Committee of the Board is responsible for such activities as is more elaborately set out in Clause 6 of this CSR Policy.
- c. The CSR Management Committee, comprises identified volunteers from a cross-functional team, will support the CSR Committee in implementation of the approved projects.

#### 6. RESPONSIBILITIES OF THE CSR COMMITTEE:

The CSR Committee shall:

- a. Formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken by the company in areas or subjects, specified in Schedule VII of the Act;
- b. Recommend the amount of CSR expenditure to be incurred on the activities referred to in clause (a) above; The CSR Committee shall provide guidance on the allocation of

the CSR budget among the Focus Areas/Goals on an annual basis.

- c. Monitor the CSR Policy of Company from time to time including monitoring the progress of projects or programs against which CSR expenditure is contributed;
- d. Formulate and recommend to the Board, an Annual Action Plan in pursuance of its CSR Policy which shall mention items as mentioned in Rule 5(2) of the CSR Rules;
- e. Ensure that the activities as are included in the CSR Policy of the Company are undertaken by the Company;
- f. Give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR projects.

## **7. RESPONSIBILITIES OF THE BOARD**

Considering that CSR is a Board-driven process, the Board will be required to:

- a. approve of the CSR Policy;
- b. disclose contents of the CSR Policy in its report and also place it on the Company's website, if any;
- c. ensure that the activities as proposed to be undertaken are included in the CSR Policy of the Company;
- d. ensure that the Company spends, in every financial year, at least 2% (two per cent) of the average net profits of the company made during the 3 (three) immediately preceding financial years;
- e. satisfy itself regarding the funds disbursed have been utilised for the purposes and in the manner as approved by it;
- f. if the Company fails to spend at least 2% (two per cent) of the average net profits of the Company, the Board shall, in its report made the Board Report, specify the reasons for not spending the amount and transfer the unspent CSR amount as per provisions of sections 135(5) and 135(6) of the Act, more elaborately set out in Clause 15 of this CSR Policy.
- g. in case of an Ongoing Project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation The Board in shall also be competent to transfer the unspent money to a separate bank account as prescribed under section 135(6) of the Act. Under exceptional circumstances, the Board may abandon or modify an Ongoing Project, partially or wholly, during the prescribed project period as per the recommendation of the CSR Committee, and by providing reasonable justification to that effect.
- h. the Board shall satisfy itself that the funds disbursed for the purpose of CSR have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer of the Company (or person responsible for financial management, in the absence of the Chief Financial Officer) shall certify to this effect.



## 8. PRINCIPLES OF SELECTION OF CSR ACTIVITY

The Company believes that the actions of the organization and its community are highly inter-dependent. The Company, through constant and collaborative interactions with its external stakeholders, strives to become an asset in the communities where it operates. As part of the CSR program, the Company actively implements the projects and initiatives for the betterment of society, communities, and the environment. The Company's support to any project will depend on the scale of the project and feasibility of the project.

While identifying CSR projects all efforts must be made to the extent possible to define the following:

- a. project objectives;
- b. baseline survey – it would give the basis on which the outcome of the CSR Activity would be measured;
- c. implementation schedules- Timelines for milestones of the CSR Activity will need to be prescribed;
- d. responsibilities and authorities; and
- e. major results expected and measurable outcome.

## 9. FOCUS AREAS/ GOALS

Sr. No.	Goal area	Projects / Actions / Activities
1	Healthcare	The Company will work with organizations working in providing medical or health related projects such as health and sanitation development programs, medical camps, old age homes etc.
2	Development of art and culture	The Company will work with organizations working in 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 to sponsor traditional and heritage art exhibition and few cultural activities, partnering with non-governmental organisations (registered trusts)
3	Underprivileged Children Education	Support for underprivileged children's education; scholarships for children to admit them in good schools; If in day school, support children with post school activities and coaching; the Company's employees can also engage in helping children in activities, counselling and coaching.

Sr. No.	Goal area	Projects / Actions / Activities
4	Contribution/Financial Assistance	Contribution to 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;
5	Promoting Employment Enhancing Vocational Skills	<p>Providing employment enhancing vocation skill</p> <p><i>(‘It is clarified that any programmes, including financial education programmes run by the Company under this focus area shall be to enhance the employability and productivity of general public.’)</i></p> <p>Support job placement and career progression; imparting vocational skills to impoverished and unemployed youth.</p>

## 10. IMPLEMENTATION

- a. CSR activities will be undertaken based on the recommendation of the CSR Committee to the best possible extent, within the Focus Areas/Goals as set out at Clause 9 to this CSR Policy.
- b. The Board shall ensure that the CSR activities are undertaken by the Company either by itself or through the following entities as indicated in Rule 4 of CSR Rules (as may be amended from time to time), referred to as “**Implementation Agencies**”. Implementation Agencies maybe identified *via* the database of registered entities maintained by the Ministry of Corporate Affairs.
  - (i) a company established under section 8 of the Act, or a Registered Public Trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the Company, either singly or along with any other company, or
  - (ii) 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
  - (iii) any entity established under an Act of Parliament or a State legislature; or
  - (iv) a company established under section 8 of the Act, or a Registered Public Trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least 3 (three) years in undertaking similar activities.
- c. The Company may also engage International Organisations for designing, monitoring

and evaluation of the CSR projects or programmes as per the CSR Policy as well as for capacity building of personnel for CSR. However, it is emphasized that an international organization shall not act as an Implementation Agency to the Company.

- d. The Company may also collaborate with other companies to undertake CSR projects or programmes in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with the CSR Rules.
- e. Mere disbursement of funds to Implementation Agencies for implementation of a CSR project does not amount to spending unless the Implementing Agency utilises the whole amount towards the CSR project.

## **11. MONITORING PROCESS OF CSR PROJECTS**

- a. To ensure effective implementation of CSR projects at each location, a monitoring mechanism shall be put in place by the CSR Committee.
- b. Annual action plan shall be formulated by the CSR Committee with respect to the CSR projects undertaken by the Company.
- c. The CSR Committee will monitor and review on a periodical basis the progress of CSR projects undertaken / completed.
- d. In order to ensure transparency and communication with all stakeholders, the CSR Management Committee will assist the CSR Committee document the details of the Company's CSR initiatives, CSR expenditure, CSR unspent amount and ensure that the same are reported in the Annual Report on CSR projects forming part of Board's Report of the Company.

## **12. ANNUAL ACTION PLAN**

The annual action plan shall be formulated by the CSR Committee and the same shall be recommended to the Board. The annual action plan in pursuance of its CSR Policy, shall include the following, namely:-

- a. the list of CSR projects or 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 as specified in sub-rule (1) of rule 4 of the CSR Rules;
- 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.

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

### 13. BUDGET, ALLOCATION AND CSR EXPENDITURE

- a. For achieving the CSR objectives through implementation of meaningful and sustainable CSR Projects, the CSR Committee shall allocate 2% or more of the average net profits of the Company made during the 3 (three) immediately preceding financial years, calculated in accordance with the relevant provisions of the Act read with the CSR Rules (“**CSR Obligation**”) towards its annual CSR budget.
- b. The Board shall ensure that whenever the net worth, turnover or net profit of the Company meet the thresholds specified in section 135(1) of the Act, that the Company spends atleast the CSR Obligation towards CSR projects. The CSR Committee and the Board should ensure that CSR expenditure shall be made monetarily and not in kind.
- c. CSR expenditure can be incurred in multiple modes:
  - (i) ‘activities route’, which is a direct mode wherein a company undertakes the CSR projects or programmes as per Schedule VII of the Act, either by itself or by engaging implementing agencies as prescribed in CSR Rules;
  - (ii) ‘contribution to funds route’, which allows the contributions to various funds as specified in Schedule VII of the Act;
  - (iii) contribution to incubators and R&D projects, as specified in item (ix)(a) and contribution to institutes/organisations, engaged in research and development activity, as specified under item (ix)(b) of Schedule VII of the Act.
- d. The Company shall however, not monetize involvement of employees in CSR projects.
- e. The budget outlay dedicated for one project can be used against another project. In such a case, the Board and CSR Committee should appropriately record the alteration in the target spending and modify the same in accordance with the actuals.
- f. The Administrative Overheads shall not exceed 5% (five percent) of total CSR Obligation of the Company for the financial year.
- g. Any Surplus arising out of the CSR projects 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 this CSR Policy and annual action plan of the Company or transfer such Surplus amount to a Fund specified in Schedule VII of the Companies Act, 2013, within a period of 6 (six) months of the expiry of the financial year.
- h. In case the Company spends an amount in excess of the CSR Obligation (as per the third proviso to sub-section (5) of section 135), such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediately succeeding 3 (three) 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 projects, if any, in pursuance of sub-rule (2) of Rule 7 of the Companies (Corporate Social Responsibility) Amendment Rules, 2021.
  - (ii) the Board of the Company shall pass a resolution to that effect.

- i. The CSR amount may be spent by the Company for creation or acquisition of a capital asset, which shall be held by – a company established under section 8 of the Act, or a Registered Public Trust or registered society, having charitable objects and CSR Registration Number under sub- rule (2) of rule 4; or beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or a Public Authority:
- j. It is clarified that expenses of the Company relating to transfer of capital asset such as stamp duty and registration fees, will qualify as admissible CSR Obligation in the year of such transfer.

#### **14. CSR REPORTING AND DISCLOSURE**

##### **a. Annual Report on CSR**

Annual Report on CSR shall form part of the Board’s Report. The Annual Report shall contain particulars as specified in the CSR Rules.

##### **b. Impact Assessment**

- (i) In case the Company has an average CSR obligation of INR 10 crore (Indian Rupees Ten Crores) or more in pursuance of sub-section (5) of section 135 of the Act, in the 3(three) immediately preceding financial years, and the Company has CSR projects with outlays of minimum INR 1 crore and which have been completed not less than 1 (one) year before undertaking impact assessment, it shall be required to undertake impact assessment.
- (ii) Impact assessment shall be undertaken through an independent agency. The Board has the prerogative to decide on the eligibility criteria for selection of the independent agency for impact assessment.
- (iii) The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR. In doing so, the Company may provide a web-link to access the complete impact assessment reports and provide an executive summary of the impact assessment reports in the annual report on CSR.
- (iv) In case the Company undertakes an impact assessment, then it may book the expenditure incurred in the said process, towards CSR for that financial year, which shall not exceed 5% (five percent) of the total CSR expenditure for that financial year or INR 50 lakhs (Indian Rupees Fifty Lakhs), whichever is less.
- (v) In case the Company collaborates with another company for the implementation of a CSR project, and if the Company undertakes an impact assessment, it may, provide a copy of the impact assessment report to the other company(ies) for their purpose of disclosure to their respective board(s) and the annual report(s) on CSR. Similarly, if any company(ies) that the Company has collaborated with have conducted an impact assessment, then the Company may seek impact assessment reports from such companies as well, for the purpose of disclosure to the Board and the annual report on CSR.
- (vi) In case the Company collaborates with one or more companies for undertaking an impact assessment, then the cost of impact assessment may be decided by the collaborating companies mutually subject to the limit as prescribed in rule

8(3)(c) of the CSR Rules and the CSR policies for each company.

The Company may also undertake an impact assessment voluntarily, even if the conditions specified in Clause 14 b. (i) have not been met.

**c. Disclosure**

The Company shall mandatorily disclose the following:

- (i) On its website for public access: Composition of the CSR Committee, CSR Policy and Projects approved by the Board;
- (ii) In the Board’s Report: Annual Report on CSR including composition of the CSR Committee, contents of the CSR Policy to be made as per Annexure II under the CSR Rules; and
- (iii) In the Financial Statements: Necessary disclosures are also required to be made in the financial statements of the Company regarding CSR including non-compliance.

**15. UNSPENT CSR AMOUNT**

- a. If the Company fails to discharge the CSR Obligation, the Board shall, in the Board’s Report and Annual Report on CSR, specify the reasons for not spending the CSR Obligation.
- b. Any amount remaining unspent pursuant to any Ongoing Project undertaken by the Company in pursuance of its CSR Policy shall be transferred by the Company within a period of 30 (thirty) days from the end of the financial year to a special account to be opened by the Company in that behalf for that financial year in any scheduled bank to be called the ‘Unspent Corporate Social Responsibility Account’, and such amount shall be spent by the Company in pursuance of its obligation towards the CSR Policy within a period of 3 (three) financial years from the date of such transfer, failing which, the Company shall transfer the same to a Fund specified in Schedule VII to the Act, within a period of 30 (thirty) days from the date of completion of the third financial year.
- c. Unspent amount relating to projects other than Ongoing Projects shall be transferred to a Fund specified in Schedule VII, within a period of 6 (six) months from the expiry of the financial year.
- d. A diagrammatic representation of the above Clauses 15 b. and 15 c. is set out below.

Nature of unspent amount	Action required	Timelines
Unspent amount pertains to ‘Ongoing Projects’	Transfer such unspent amount to a separate bank account of the company to be called as ‘Unspent CSR Account’.	Within 30 (thirty) days from the end of the financial year.
Unspent amount pertains to ‘other than Ongoing Projects’	Transfer unspent amount to any fund included in Schedule VII of	Within 6 (six) months from the end of the financial year.

Nature of unspent amount	Action required	Timelines
	the Act.	

- e. The Company shall not spend the unspent CSR amount, other than the amount pertaining to Ongoing Projects, on any CSR projects during the intervening period of 6 (six) months after the end of the financial year. Such unspent CSR amount is required to be transferred to any fund included in Schedule VII of the Act.
- f. In furtherance of the above, the Company shall open a single special account, called ‘Unspent Corporate Social Responsibility Account’, for a financial year in any scheduled bank, to transfer the unspent amount w.r.t Ongoing Project(s) of that financial year. The Company needs to open a separate ‘Unspent CSR Account’ for each financial year but not for each Ongoing Project. This account shall not be used by the Company as collaterals or creating a charge or any other business activity.

**16. EFFECTIVE DATE**

This Policy shall be effective from June 06, 2022.

**17. CONTACT**

For queries related to CSR Policy, please contact

Chief Compliance Officer and Head – Legal  
 KFin Technologies Limited  
 Email id: [compliance.corp@kfintech.com](mailto:compliance.corp@kfintech.com)

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