SNAPMINT FINANCIAL SERVICES PRIVATE LIMITED

Corporate Social Responsibility Policy

Version 1

Document review and approval

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INTRODUCTION

Snapmint Financial Services Private Limited (hereinafter referred to as 'the Company' or 'SFSPL' or 'Snapmint'), is a non-deposit taking Non-Banking Financial Company (Investment and Credit Company) registered with the Reserve Bank of India ('RBI'). The Company is engaged in the business of extending Consumer Finance loan and Personal loan

In compliance with the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, SFSPL is, inter-alia, required to:

(i) Formulate a Corporate Social Responsibility (CSR) Policy, recommend the amount of CSR expenditure and monitor the CSR activities of the Company from time to time.
(ii) Ensure that the Company spends, in every financial year, whenever applicable, at least two per cent of its average Net Profits (arrived at as per the provisions of Section 198 of the Companies Act, 2013), made during the three immediately preceding financial years, in pursuance of its CSR Policy.

PHILOSOPHY

Recognising that business enterprises are economic organs of society and draw on societal resources, it is SFSPL's belief that a company's performance must be measured by its Triple Bottom Line contribution towards building economic, social and environmental capital. The Company is committed to creating meaningful and lasting social impact by undertaking initiatives that address critical developmental needs while promoting environmental stewardship and community welfare. CSR activities shall be planned and implemented in alignment with the provisions of the Companies Act, 2013 and the Company's core values, ensuring efficient utilisation of resources and measurable outcomes. Through its CSR efforts, the Company aims to contribute towards inclusive growth, improve the quality of life of disadvantaged sections of society, and support the nation's sustainable development objectives.

APPROACH

Company's approach will be that, CSR activities shall be undertaken in multiple ways:

(i) Independently by the company or
(ii) In association with external social bodies / NGOs/Trust or
(iii) Contribution to external social bodies / NGOs/Trust for carrying on CSR activities

VISION

(i) The Company is committed to conduct business in a true, fair and ethical manner and takes up the responsibility to create a good impact in the society it belongs.
(ii) To lay down guidelines to make CSR a key business process for sustainable development of the society.
(iii) Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.
(iv) The Company's CSR vision is for an inclusive society where everybody has access to opportunities, financial security, and quality of life.
(v) The Company's CSR mission is to be a significant contributor in India's growth story, by undertaking innovative, technology driven and impactful CSR programs with underprivileged communities.
(vi) The Company aims to fulfil the requirements laid down under the Companies Act, 2013 and act diligently to comply with all its Rules and Regulations on CSR.
(vii) To carry out CSR Programmes in relevant local areas to fulfil commitments arising from requests by government / regulatory authorities

OBJECTIVE OF THE CSR POLICY

Objectives of this CSR Policy are to

1. describe the principles that will guide the Company in all the CSR activities that will be undertaken by it;
2. specify the modalities of execution and the implementation mechanism for aforementioned projects and programmes in alignment with this CSR Policy.
3. promote or undertake projects and programmes that are, (a) Sustainable and create a long-term change; (b) Have specific and measurable goals in alignment with the Company's philosophy; (c) Address the most deserving cause or beneficiaries and (d) in terms of Schedule VII to the Companies Act

ROLE OF BOARD OF DIRECTORS

(i) The Board shall ensure that the Company spends, in every financial year, at least two per cent of the average net profit of the Company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.

(ii) The Board shall form a CSR Policy and CSR Committee and disclose the composition of the Committee and CSR Policy and Projects approved by the Board on Company's website, if any, for public access.

(iii) The Board of Directors of the Company shall, make Annual Report on CSR activities which forms part of the Board's Report for every financial year as required in the Companies Act 2013 and Companies (CSR Policy) Rules, 2014 framed under the Act from time to time.

(iv) The Board shall ensure implementation of the CSR activities and expenditure of requisite amount on CSR every year as per the applicable law and disclose reasons for not spending the amount (if applicable) in the Annual Report on CSR which forms the part of the Board Report of the Company and ensure the treatment of unspent amount as per the provisions of Companies Act 2013 and Companies (CSR Policy) Rules, 2014 rules made thereunder.

(v) The Board shall ensure that CSR activities are undertaken by the Company itself or through implementing partner(s) eligible for the said purpose, as per the requirements laid down under the Companies Act 2013 and Companies (CSR Policy) Rules, 2014 made thereunder including statutory modifications/amendments.

(vi) Ensure that CSR activities should be aligned to CSR Focus Areas/activities permitted in Schedule VII of the Companies Act 2013 and Companies (CSR Policy) Rules, 2014 made thereafter.

(vii) The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.

(viii) The Board shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it.

(ix) The Board shall ensure that any amount which may remain unspent or is spent more than requirement amount out of the CSR budget shall be treated as per the provision of the Companies Act 2013 and Companies (CSR Policy) Rules, 2014 made thereunder.

(x) The Board shall monitor the implementation of the Ongoing Projects with reference to the approved timelines and year-wise allocation and may make modifications, if required, for smooth implementation of the project within the overall permissible time.

(xi) Ensure that the activities as are included in Corporate Social Responsibility Policy of the Company are undertaken by the Company.

PERMITTED SECTORS

Company would focus the CSR activities around following thrust areas (in line with Schedule VII of Companies Act, 2013 including any amendments thereto):

(i) Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive health care and sanitation, including contribution to the Swachh 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 art 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 the socio – economic development and relief and welfare of the scheduled caste, tribes, other backward classes, minorities, and women;

(ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering, and medicine, funded by the Central Government or any State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institutes 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);

(x) Rural development projects;

(xi) Slum area Development (slum area means 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); and

(xii) Disaster management, including relief, rehabilitation and reconstruction activities.

CSR REPORTING AND DISCLOSURES

(i) The Board's Report of a Company covered under the Companies Act, 2013 act and rules pertaining to any financial year shall include an annual report on CSR containing particulars specified in Annexure 11 of Companies (CSR Policy) Rules, 2014.

(ii) The Company shall ensure the composition of the CSR and ESG Committee, CSR Policy and Projects approved by the Board shall be displayed at the Company website.

(iii) The Company Shall furnish a report on Corporate Social Responsibility in Form CSR-2 every year to the Registrar as an addendum to FORM AOC-4 or AOC-4 XBRL or AOC-4 NBFC, as required.

AMENDMENTS

Any amendment in the applicable laws shall be construed to be an amendment to the above policy subject to the amendments that may be made and approved by the Board.