



CREDITACCESS GRAMEEN LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Revision History

Version	Author	Description of Changes	Release Date
1	Company Secretary	First version	November 11, 2014
2	CS & CCO	The amendment made to be aligned with the Ministry of Corporate Affairs CSR Amendment Rules, 2020	June 25, 2021
3	CS & CCO	Insertion of new clause 2 "Policy Statement/Vision" and amendments to Clause 9 & 10	March 23, 2022
4	CS & CCO	Fixing threshold for reallocation of CSR budget for informing CSR Committee in case of its breach & for seeking prior approval of CSR Committee / Board for increasing the existing CSR Budget up to 25% of the original budget - Clause 10	March 04, 2024
5	CS & CCO	Aligned with extant provisions of the Companies Act, 2013 and insertion of "Review" clause	April 1, 2024
5	CS & CCO	Re-adoption	April 21, 2025
6	CS & CO	• Section 5 – CSR Committee: Aligned the roles and responsibilities of the Committee with the extant applicable provisions of the Companies Act, 2013 • Section 6 – Identified areas for CSR Projects: - Addition of CSR activities as per Companies CSR Spend - Added reference to MCA circulars/notifications/amendments issued from time to time, to provide flexibility for adopting future activities. • Section 10 – Finance for CSR Project: Aligned with the provisions of Companies regarding treatment of surplus arising from CSR activities and to provided clarity on the statutory requirements relating to utilization and transfer of unspent CSR amounts • Section 12 – Policy Review & Update: Modified for better clarity	July 24, 2026

Version Control

Version	Author	Reviewed by	Approved by
1	Company Secretary	MD & CEO	Board of Directors
2	Chief Compliance Officer	MD & CEO	Board of Directors
3	Chief Compliance Officer	MD & CEO	Board of Directors
4	Chief Compliance Officer	Managing Director	Board of Directors
5	CS & Chief Compliance Officer	Managing Director	Board of Directors
6	Company Secretary & Compliance Officer	MD & CEO	Board of Directors

Contents

1.	Introduction:.....	5
2.	Policy Statement / Vision:	5
3.	Objective:.....	5
4.	Scope:	5
5.	CSR Committee:	5
6.	Identified Areas for CSR Projects:.....	6
7.	Implementation:.....	7
8.	Locus of CSR Projects:.....	7
9.	Structure of CSR Projects:.....	7
10.	Finance for CSR Projects:.....	7
11.	Reporting and Monitoring:.....	8
12.	Policy Review and Update	9

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Introduction:

CreditAccess Grameen Limited ("CA Grameen" or the "Company") in compliance with Section 135 of the Companies Act, 2013, is incorporating in its structure, Corporate Social Responsibility projects through this Corporate Social responsibility (CSR) Policy and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the Annual Action plan. This Policy covers all the internal dimensions of the CSR structure and further captures and sets out the process of implementation of the CSR related activities.

2. Policy Statement / Vision:

At CA Grameen, we believe in incorporation of a holistic CSR perspective within Company's strategic planning and core operations so that the Company is managed in the interest of a broad set of stakeholders, particularly the community, to achieve maximum economic and social value over the medium to long term.

CA Grameen remains committed to touch the marginalized section of the societies through its focused CSR initiatives, including United Nations Sustainable Development Goals. The Company aims to integrate CSR activities into its business operations leading to alignment of business growth with sustainability of the social and environmental fabric of the end communities.

3. Objective:

To ensure implementation of a policy framework that stimulates, fosters, recognizes, supports and facilitates continuing growth and application of the best practice in CSR.

To bring sustainable development in the identified areas, as specified point no. 6 below, selected by the CSR committee as the focal point of the Company's CSR Policy.

4. Scope:

This Policy shall apply to all the CSR projects undertaken in any branch or office of the Company, whether such project is executed in collaboration with any other company or on its own.

5. CSR Committee:

The Board of Directors of the Company shall constitute a Committee to govern and oversee the CSR activities of the Company. The Committee shall have at least 3 (three) Members and out of which at least 1 (One) director shall be an independent director at any point of time.

The CSR Committee of the Board shall meet at least once in every 6 (six) months in a financial year.

The Committee shall *inter-alia*–

- a. Recommend the amount of expenditure to be incurred on the activities referred to or specified under Schedule VII to the Companies Act, 2013 including any amendments thereto and
- b. Oversee the implementation of the approved CSR Projects / activities and monitor their progress, ensure compliance with the applicable provisions relating to the treatment of unspent CSR amounts, oversee impact assessment wherever required.
- c. Periodically review and monitor the Corporate Social Responsibility Policy of the Company.

The Committee shall also formulate and recommend to the Board an annual action plan in pursuance of its CSR policy, which shall include *inter-alia*, the following, namely:

- a. the list of CSR projects or programmes that are approved to be undertaken during the relevant financial year in areas or subjects specified in Schedule VII of the Act;
- b. the manner of execution of such projects or programmes as specified in the Companies (CSR Policy) Rules.
- c. the modalities of utilisation of funds and implementation schedules for the projects or program.
- 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 of Directors may alter the annual action plan at any time during the financial year on the recommendation of CSR Committee, based on the reasonable justification to that effect.

6. Identified Areas for CSR Projects:

In consonance with the activities specified in the Schedule VII of the Companies Act, 2013 ("the Act"), the Company's CSR Committee has identified the below areas, for implementation of its CSR activities:

- a. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.
- b. Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- c. Rural Development Projects
- d. Disaster management activities, including relief, rehabilitation, and reconstruction activities.

Provided, notwithstanding the above, the Company shall undertake such other activities as may be allowed under Schedule VII of the Act including any circular/notifications/amendments issued in this regard by Ministry of Corporate Affairs, from time to time.

7. Implementation:

The Company shall implement its CSR activities through CreditAccess India Foundation, a Section 8 company, incorporated specifically for the purpose of implementation of CSR activities of Group companies.

8. Locus of CSR Projects:

The CSR Projects shall be implemented in all the operational areas of the Company as the Company expands its operations.

9. Structure of CSR Projects:

The Company's CSR Projects neither include any activity undertaken in the normal course of business of the Company nor include contribution to any political party under Section 182 of the Companies Act, 2013 or have any religious affiliations. The CSR projects will be preferably implemented in the areas where the Company has presence. The projects shall not have any exclusive benefit for the employees of the company or their family members. The projects shall not include any activities for deriving direct marketing benefits for Company's products or services. The projects shall exclude any activities carried out for meeting any statutory obligations.

For the accomplishment of the above identified areas under Point no. 6 above, the Company shall work in partnership with CreditAccess India Foundation to develop & implement the projects as suggested by the CSR Committee and duly approved by the Board of Directors.

10. Finance for CSR Projects:

The Company shall present to the CSR Committee, the Annual Plan of activities along with budgets at the beginning of every financial year. The annual CSR spend shall be equal to such percentage of average net profits of the Company as per Section 135(5), to be approved by the Board.

The Company shall periodically review the progress of the Annual CSR plan. Based on the evaluations, the Company may reallocate funds across different themes or projects with careful consideration, ensuring they are made in response to pressing needs or opportunities to enhance the impact of CSR activities. In the event that the reallocation of funds during the quarter exceeds 50% of the initially allocated budget to a theme/project, the CSR Committee will be promptly informed within two weeks thereof to ensure proper governance and oversight.

With the objective of maximizing the CSR impact, the Company may strategically extend its CSR budget / expenditure for any specific CSR activity / project beyond 100% of the current year's obligation by only up to 25% of the original CSR budget with the prior approval of the CSR committee and the Board.

The surplus, if any, arising out of CSR initiatives shall not form part of business profit and shall be ploughed back into the same CSR project, or shall be utilized for other CSR activities under the approved CSR Policy and annual action plan, in line with Rule 7(2) of the CSR Rules.

Any amount remaining unspent pursuant to the company's CSR obligation shall be dealt with as under Section 135(5)/(6) of the Act:

- a. Where the amount pertains to an ongoing project, it shall be transferred to a designated Unspent CSR Account and spent in accordance with the CSR Policy and annual action plan within the timeline prescribed under the Act.
- b. Any amount remaining unspent even after the said three-year period (in case of ongoing projects), or any unspent amount not pertaining to an ongoing project, shall be transferred to a Fund specified in Schedule VII, within the timeline prescribed under the Act.

In case of CSR expenditure exceeding the CSR obligation during a financial year, such excess amount may be set off against CSR requirements in subsequent financial years.

The Company may spend its CSR budget on creation or acquisition of a capital asset subject to fulfilment of conditions specified under the Companies (CSR Policy) Amendment Rules, 2021 and any amendment to the same.

The CSR Committee shall present to the Board the details of the approved projects & budgets.

The Company shall submit progress and status reports on the activities and budgets utilized in line with the CSR requirements under the Act to the CSR Committee, on a periodic basis.

The Company may engage an external evaluator (either CA or any other professional firm) to evaluate the project achievements and verify & confirm utilization of the budgets on an annual basis at its own cost.

Overhead expenditure incurred shall not exceed 5% of the total CSR contribution made by the Company in the respective financial year or such other percentage as may be permitted under the Act, from time to time.

11. Reporting and Monitoring:

CSR Committee of the Company shall monitor the implementation of the CSR projects as required under the Companies Act 2013 and whether the funds provided by the Company are utilized in accordance with the approved plans and report to the Board of Directors.

CreditAccess India Foundation shall provide detailed report of CSR activities carried out as

well as budgets utilized in the prescribed format to the Company's CSR committee.

The Board of Directors shall submit a report in the prescribed format which shall be annexed to the Directors' Report pursuant to sub-section (3) of Section 134 of the Act and the applicable rules framed thereunder, from time to time.

If for any reason CreditAccess India Foundation is unable to utilize the entire funds provided by the Company, such unutilized funds shall be treated in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as may be amended from time to time.

12. Policy Review and Update

This Policy shall be reviewed by the Corporate Social Responsibility and Environment, Social & Governance Committee (CSR & ESGC) and Board of Directors, as and when deemed necessary or at least on an annual basis. In the event of any conflict between the Act or the SEBI Regulations or any other statutory enactments (collectively referred to as "Regulations") and the provisions of this policy, the Regulations shall prevail over this policy. Any subsequent amendment / modification in the Regulations, in this regard shall automatically apply to this policy.
