



CREDITACCESS GRAMEEN LIMITED

[Environmental, Social & Governance Policy](#)

Revision History

Version	Author	Description of Changes	Release Date
1.0	Nilesh Dalvi, VP – Investor Relations	First version	March 23, 2022
1.0	Nilesh Dalvi, VP – Investor Relations	Re-adoption	July 21, 2023
1.0	Nilesh Dalvi - SVP Investor Relations	Re-adoption	April 01, 2024
2.0	Sahib Sharma – DGM Investor Relations	As stipulated by BSE, the ESG policy is aligned with the nine principles of the National Guidelines for Responsible Business Conduct (NGRBC)	May 16, 2025
2.0	Sahib Sharma – DGM Investor Relations	Re-adoption	April 16, 2026
2.1	Sahib Sharma – DGM Investor Relations	Amendment to add climate governance, low-carbon transition and phased renewable electricity commitments; materiality assessment timelines, climate and public-policy engagement commitments; stakeholder engagement and capacity building; sustainable value chain management	September 11, 2026

Version	Author	Reviewed by	Approved by
1.0	Nilesh Dalvi, VP – Investor Relations	MD & CEO	Board of Directors
1.0	Nilesh Dalvi, VP – Investor Relations	MD & CEO	Board of Directors
1.0	Nilesh Dalvi – SVP Investor Relations	Managing Director	Board of Directors
2.0	Sahib Sharma – DGM Investor Relations	CEO	Board of Directors
2.0	Sahib Sharma – DGM Investor Relations	MD & CEO	Board of Directors
2.1	Sahib Sharma – DGM Investor Relations	MD & CEO	Board of Directors

Contents

Introduction	4
Principle 1: Ethics, Integrity & Transparency	4
Principle 2: Sustainable & Safe Provision of Goods & Services	5
Principle 3: Respecting and Promoting Employee Well-Being	6
Workplace and Employee Centric Approach	6
Principle 4: Respect for Stakeholders.....	8
Principle 5: Promoting & Respecting Human Rights	8
Principle 6: Protecting the Environment	9
Principle 7: Responsible and Transparent Engagement in Public and Regulatory Policy.....	11
Principle 8: Promoting Inclusive Growth and Equitable Development.....	12
Principle 9: Responsible Engagement and Value Creation for Customers.....	13
ESG Review and Continuous Improvement	13

Introduction

CreditAccess Grameen Limited ("CA Grameen" or the "Company"), India's leading rural focused inclusive financing platform, has been working at the bottom-of-the-pyramid over the past two decades providing access to affordable finance to unserved and underserved low & middle -income households across India. The Company, through its customer-centric business model and diverse products supporting the entire life cycle needs of the customer, has been creating large-scale positive social impact across the communities, including its customers, employees and other stakeholders. The Company's business strategy and policies are pillared on customer centricity and employee centricity, allowing sustainable growth and empowering communities over the long term.

CA Grameen acknowledges the responsibility to further strengthen its allegiance to global standards on Environmental, Social & Governance (ESG) practices and effectively integrate them into the Company's core business strategies. The Company remains committed to identifying material stakeholder issues and the associated ESG risk implications and accordingly takes necessary actions to strengthen the business model to mitigate such risks and strive towards long-term sustainable business growth and stakeholder association.

Principle 1: Ethics, Integrity & Transparency

CA Grameen promotes ethical work culture with various policies and guidelines including board diversity and inclusion, anti-bribery, anti-corruption, anti-money laundering, IT/data privacy and security, whistleblower, and corporate taxation in place. Every employee is expected to uphold the highest standards of professional conduct. The Company recognizes that ethical leadership within CA Grameen improves public trust and enhances compliance, therefore strengthening stakeholder relationships. The Whistle Blower (Vigil) mechanism provides a channel to all stakeholders to report concerns about unethical behaviour, actual or suspected fraud, or violation of the Codes of Conduct or policy.

The Company has regular Board meetings to review financial reports and improve transparency & accountability policies. The Company's various channels with the stakeholders, including employees, customers, suppliers, and regulators, support transparent dissemination of publicly available information. CA Grameen shall ensure timely communication of financial performance, various environmental and social objectives to its stakeholders, or any potential conflict of interest, along with a proper mechanism for handling queries/ grievances.

The CSR & ESG committee of the Company tracks, assesses and manages the impact of existing and emerging E&S risks on the loan portfolio by adopting robust Environmental & Social Management System (ESMS) framework and policies on Corporate Social Responsibility (CSR), supplier's code of conduct, responsible procurement, and business continuity. The Company will ensure compliance with applicable local and national laws on environment, health, safety standards, and International Finance Corporation (IFC) Performance Standards, and compliance with global disclosure standards.

The Company proactively implements effective mechanisms to address and remediate any violations of ethical, transparency, or accountability standards. The emerging stakeholder issues are identified

to provide timely feedback, aligning core business strategies to effectively address related risks and opportunities.

Principle 2: Sustainable & Safe Provision of Goods & Services

CA Grameen focuses on identifying opportunities for operational resource efficiencies and savings through continuous improvement in areas of emissions, energy, paper, water, and waste management.

CA Grameen is committed towards sustainable management and use of natural resources in the most efficient, cost-effective, and environmentally responsible manner. The Company aims to minimize the energy requirements of its assets, support sustainably sourced energy, foster an organizational culture that promotes energy conservation, and engage with its stakeholders to encourage energy-saving behaviour.

The Company aims to regularly measure and disclose its greenhouse gas (GHG) emissions indicators and externally verify them on an annual basis. The Company's initiatives on the climate front will include –

- i. Evaluation of alternative energy sources and use of renewable energy sources in accordance with the Company's phased renewable electricity commitment
- ii. Optimisation of business and field processes to reduce energy usage intensity
- iii. Incorporating energy-efficient building designs where applicable
- iv. Ensuring a fuel-efficient fleet of vehicles for business operations, regularly maintained to limit GHG emissions
- v. Prioritise two-wheelers over four-wheelers for field operations
- vi. Increase staff awareness of the criticality of energy conservation

In this regard refer to [Energy Management Policy](#).

CA Grameen is cognizant of the importance of responsible waste management and its impact on environmental sustainability. The waste generated through the CA Grameen operations are e-waste, dry waste (primarily paper waste), and wet waste (primarily from the cafeteria). The Company ensures that all waste produced is disposed off responsibly, using approved & authorized waste contractors/recyclers, in line with the prescribed regulations and industry's best practices. The Company will try to minimize waste generation at source and facilitate repair, reuse, and recycling over the disposal of wastes, where it is cost-effective. The Company will promote environmental awareness to increase and encourage waste minimization, reuse, and recycling.

The Company prioritizes investing in and adopting innovative technologies and practices that enhance sustainability across all its operations. The Company believes that responsible financial inclusion encompasses core Client Protection Principles to help financial service providers practice good ethics. The ESG policy framework will serve as a guiding document for all ESG actions and initiatives undertaken by the Company. The framework will be reviewed and updated on an annual basis, subject to approval by the CSR & ESG Committee of the Board. This will enable the Company

to continually strengthen our adherence to various global ESG standards and improve the level of disclosures.

CA Grameen's Policy on Environmental and Social Management System (ESMS) will ensure compliance with applicable local and national laws on environment, health, and safety standards and International Finance Corporation (IFC) Performance Standards. It will help the Company to avoid and manage loans with potential environmental and social risks through adequate due diligence during loan disbursement and loan utilisation checks post loan disbursement. CA Grameen will ensure that it shall not extend any loans which fall under the IFC exclusion (prohibited activities) list. The Company's loan agreements will contain appropriate environmental and social requirements as stipulated in the ESMS.

Principle 3: Respecting and Promoting Employee Well-Being

The Company strives to establish robust workplace policies to strengthen the organisational fabric and promote a conducive work environment. This entails focus on employee code of conduct, human rights, equal work opportunities, gender diversity, employee well-being and safety, performance reviews, and remuneration. The Company conducts regular audits wherever necessary for the health and safety of employees to identify and mitigate potential hazards. The Company has a "Business Continuity Plan" in place for any emergency and response plans. Employee feedback is given high importance in the organization to understand employee needs & concerns, and appropriate actions are taken to address them. A special 'Employee Grievance Mechanism' is in place to address the queries or issues of the employees and respective measures are taken accordingly.

Workplace and Employee Centric Approach

Work Ethics and Code of Conduct

CA Grameen expects all employees to strictly act in accordance with the high professional and ethical work standards. The employees are expected to avoid conflicts of interest and remain committed to integrity in all work-related aspects and comply with applicable laws, regulations, and Company policies. The employees are expected to avoid misuse or misappropriation of the Company's assets and ensure the highest levels of confidentiality with respect to customer information, unpublished price sensitive information and promote fair dealing within and outside the Company. Adequate policies and procedures will be defined to take necessary disciplinary actions and report any violations from the policies.

Human Rights

CA Grameen is committed to uphold employee rights and treat all employees with respect and dignity to promote a healthy and conducive work environment for the employees. The Company aims to comply with United Nations (UN) Guiding Principles on Business and Human Rights and International Labour Organisation (ILO) conventions which are ratified by India. The Company's human rights policy will ensure equity, diversity, and inclusion within the organization, non-discrimination, prevention of human rights violations across entire value chain, and adequate training/ awareness on human rights.

Equal Opportunities and Gender Diversity

CA Grameen remains committed to value equal opportunities, diversity and inclusion at the workplace. The Company shall encourage a diverse workforce without any discrimination on basis of age, gender, sexual orientation, marital status, physical or mental disabilities, race, caste, colour, national or ethnic origin, religion or language. The Company aims to leverage the diverse thinking, skills, and experience of employees, and provide flexibility to accommodate the evolving needs of employees at different career and life stages. The Company aims to eliminate various structural and cultural barriers, attract diverse talent, position as an employer of choice and effectively respond to changing societal expectations.

Women Safety

CA Grameen remains committed to fostering a safe working environment for women, with a zero-tolerance policy on sexual harassment along with quick investigation and redressal of complaints through a fair and transparent process. Further, the Company believes that all employees, regardless of their gender, have the right to work in an environment safe from verbal/ physical abuse and unsolicited sexual overtures. The Company has a Policy on Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace ("POSH policy") and an Internal Committee, in line with the requirements of the POSH Act.

Employee Wellbeing, Career Growth, Remuneration and Benefits

CA Grameen remains committed to promoting a safe and conducive work environment for its employees, ensuring their occupational health and safety, adequate healthcare benefits including life insurance, accidental insurance, and medical cover etc. The Company encourages growth opportunities and career progression by prioritizing internal job opportunities wherever appropriate. The Company's remuneration policies comply with local labour laws and stipulate reasonable compensation sufficient to attract, motivate, and retain talent and ensure alignment of employees' performance with short-term and long-term objectives of the Company. The field staff are paid fair wages, complying with minimum labour wages.

Training and Development

CA Grameen remains committed to its goal of inclusive development, for which it takes responsibility to nurture a young workforce from rural and semi-urban communities. The Company's preference is towards recruiting fresh talent from customer families and local communities. The Company ensures pre-hiring training to prospective employees followed by extensive post-hiring training to help employees develop the required skills and explore internal growth opportunities. The right training helps to inculcate the organisational culture and build a synergistic environment between employees and customers. The Company aims to imbibe ESG aspects in periodic training sessions for all employees to keep them updated on various latest developments on the ESG front and ensure compliance with ESG standards on a continuous basis. All employees are provided with regular training on health and safety.

Principle 4: Respect for Stakeholders

At CA Grameen, the principles of good governance are ingrained in the organizational culture and values, which helps us to serve the stakeholders to our best possible capacity and strengthen stakeholder relationships and improve stakeholder engagement in business activities.

The Company strongly believes in the ethos of transparency and accountability, for which it shall ensure various established systems for the timely flow of information towards our stakeholders. We ensure engagement is inclusive, enabling stakeholders to actively participate and share their perspectives

The Company has regular board meetings to review and improve our transparency and accountability policies. The board plays a pivotal role in effective compliance and implementation with respect to regulatory and stakeholder demands, acknowledging their rights and interests.

CA Grameen shall ensure timely communication of various environmental and social objectives to its stakeholders, along with a proper mechanism for handling of queries/ grievances and work towards improving the overall disclosures to effectively demonstrate the Company's ESG commitment to its stakeholders. The Company aims to effectively integrate ESG principles into its business model and adopt sustainable business practices as it scales its business in the future, focusing on both financial and non-financial commitments and aligning its business strategy, performance and governance to build long-term sustainable value for all our stakeholders.

CA Grameen shall conduct a formal materiality assessment at least once every five years to identify and prioritise the environmental, social and governance topics most significant to the Company and to its stakeholders. The assessment shall be carried out in consultation with internal and external stakeholder groups, including employees, customers, investors, lenders, suppliers, regulators and community representatives, and shall be informed by recognised national and international frameworks, including the National Guidelines on Responsible Business Conduct and the GRI Standards on material topics.

The outcome shall be documented as a materiality matrix and placed before the CSR & ESG Committee of the Board for review and approval. The material topics so identified shall form part of the Company's ESG strategy, targets, risk register and Business Responsibility and Sustainability Report, and shall be disclosed publicly. An interim reassessment shall be undertaken where there is a material change in the Company's business, portfolio geography, regulatory environment or stakeholder expectations.

Principle 5: Promoting & Respecting Human Rights

CA Grameen is committed to upholding employee rights and treating all employees with respect and dignity to promote a healthy and conducive work environment for the employees. The Company aims to comply with United Nations (UN) Guiding Principles on Business and Human Rights and International Labour Organisation (ILO) conventions which are ratified by India. The Company's human rights policy will ensure equity, diversity, and inclusion within the organization, non-

discrimination, prevention of human rights' violations across entire value chain, and adequate training/ awareness on human rights. The Company strictly prohibits employment of forced labour and child labour.

CA Grameen remains committed to valuing equal opportunities, diversity, and inclusion at the workplace. The Company shall encourage a diverse workforce without any discrimination on the basis of age, gender, sexual orientation, marital status, physical or mental disabilities, race, caste, colour, national or ethnic origin, religion or language. CA Grameen remains committed to promote a safe and conducive work environment for its employees and ensuring compliance with relevant health and safety regulations.

The Company has a Policy on Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace ("POSH policy") and an Internal Committee, in line with the requirements of the POSH Act and the Rules made thereunder for reporting and conducting inquiry into the complaints made by the victims. The functioning of the said Committee is in line with the provisions of the POSH Act.

The details of complaints received under the POSH Act form part of the Business Responsibility and Sustainability Report.

Principle 6: Protecting the Environment

To further our commitment to global ESG standards, CA Grameen had constituted a board approved ESG policy in 2022, outlining the framework to acknowledge various ESG risks, impacts and opportunities in the Company's business segments and operations.

The Company conducts environmental impact assessments to identify and mitigate potential environmental risks wherever applicable. The ESG policy framework will serve as a guiding document for all ESG actions and initiatives undertaken by the Company. The framework will be reviewed and updated on an annual basis, subject to approval of the CSR & ESG Committee of the Board. This will enable the Company to continually strengthen its adherence to various global ESG standards and improve the level of disclosures. Employees are provided with training on environmental practices and sustainability.

The Company shall obtain external assurance over its sustainability disclosures including the assurance requirements applicable to the Business Responsibility and Sustainability Report.

Climate Change Strategy

Climate Governance

The Board of Directors will have oversight of the Company's ESG matters, including climate-related risks and opportunities. This oversight is carried out through the CSR & ESG Committee of the Board, which is responsible for reviewing and guiding the Company's climate change strategy, targets and performance. Climate-related risks and opportunities are a scheduled agenda item at the Committee's meetings, which are held at least annually.

Below the CSR & ESG Committee, a cross-functional ESG Working Group led by CFO is responsible for the day-to-day management and implementation of the Company's climate-related initiatives. The Working Group comprises representatives from the relevant departments across the Company, ensuring that climate considerations are embedded across functions, and is responsible for implementing the climate strategy, monitoring climate-related risks and opportunities, tracking performance against targets, and preparing climate-related disclosures. The Working Group reports to the CSR & ESG Committee, which in turn reports to the Board of Directors, providing a clear line of accountability from management to the Board.

Low-Carbon Transition

The Company is committed to transitioning towards a low-carbon business model. The Company shall develop a low-carbon roadmap setting out its pathway to reduce greenhouse gas emissions across its own operations and, over time, its financing activities,

The Company shall progressively measure and disclose the greenhouse gas emissions associated with its lending portfolio, applying recognised methodologies for emissions from activities financed by the Company. The Company shall structure its climate-related disclosures around the four pillars of governance, strategy, risk management, and metrics and targets

Sustainable Finance Framework

The Company shall develop a Sustainable Finance Framework governing the issuance and/or origination of green, social, sustainable and sustainability-linked financial instruments, including debt instruments such as bonds, non-convertible debentures and loans.

The Framework shall cover the below aspects as per applicable regulations (SEBI- Framework for ESG debt securities):

- i) To set out eligible green and social categories and use-of-proceeds criteria,
- ii) To draw recognised market principles (including the ICMA Green Bond Principles and Social Bond Principles and the Loan Market Association's Sustainability-Linked Loan Principles), together with processes for project/asset evaluation and selection,
- iii) management of proceeds, and
- iv) impact reporting.
- v) Independent external review/ Second-Party Opinion

The Framework shall be placed before the CSR & ESG Committee and the Board of Directors for approval.

Energy & Emissions Management

CA Grameen is committed towards sustainable management and use of natural resources in the most efficient, cost-effective, and environmentally responsible manner. The Company aims to minimize the energy requirements of its assets, support sustainably sourced energy, foster an organizational culture that promotes energy conservation, and engage with its stakeholders to encourage energy-saving behaviour.

The Company aims to regularly measure and disclose its greenhouse gas (GHG) emissions indicators

and externally verify them on an annual basis. The Company's initiatives on climate front will include:

- Evaluation of alternative energy sources and use of renewable energy sources
- Optimisation of business and field processes to reduce energy usage intensity.
- Incorporating energy-efficient building designs where applicable.
- Ensuring fuel-efficient fleet of vehicles for business operations, regularly maintained to limit GHG emissions
- Prioritise two-wheelers over four-wheelers for field operations.
- Increase staff awareness on criticality of energy conservation.

In this regard refer to [Energy Management Policy](#).

Waste Management

CA Grameen is cognizant of the importance of responsible waste management and its impact on environmental sustainability. The wastes generated through the CA Grameen operations are e-waste, dry waste (primarily paper waste), and wet waste (primarily from the cafeteria). The Company will ensure that all wastes produced are disposed off responsibly, using approved & authorized waste contractors/recyclers, in line with the prescribed regulations and industry best practices.

The Company will try to minimize waste generation at source and facilitate repair, reuse, and recycling over the disposal of wastes, where it is cost-effective. The Company will promote environmental awareness to increase and encourage waste minimization, reuse, and recycling.

CA Grameen is conscious of the use of paper in its business operations. Increasing use of digital applications at the field is gradually helping in the reduction in paper consumption, thus leading to lower paper wastage. The Company also aims to control the printing and photocopying operations by employees across all office locations to reduce wastage of paper.

In this regard refer to [Waste Management Policy](#).

Principle 7: Responsible and Transparent Engagement in Public and Regulatory Policy

The Company reaffirms its firm commitment to conducting its business with integrity, ethics and transparency at all times. As a testament to its belief and commitment, the Company will formulate, review, revise, modify and adopt good practices, Policies and procedures, wherever applicable, from time to time on matters relating to Corporate Governance, Anti-Bribery and Anti-Corruption, Vigil mechanism, Staff Accountability, Compliance, Code of Conduct for Employees, Senior management and Board of Directors, Fair Practices Code, Prohibition of Insider Trading in Securities of the Company and others. Frequent training will be provided for all new joiners as well as existing employees, wherever applicable, to familiarize themselves with the non-negotiable concepts of equity, fairness, and principles of natural justice while dealing with all stakeholders including regulators and third parties.

The Company does not engage in funding or support any activity, communication or advocacy that denies climate science or that opposes climate action or climate-related policy. The Company ensures

that its own advocacy, and the positions taken by the industry associations of which it is a member, are consistent with its climate commitments and with the goals of the Paris Agreement.

The relevant Policies are made available on the website of the Company for reference of all stakeholders - <https://www.creditaccessgrameen.in/governance/policies/>

Principle 8: Promoting Inclusive Growth and Equitable Development

CA Grameen remains committed to valuing equal opportunities, diversity, and inclusion at the workplace. Employees of the Company are considered the main contributors to a healthy work environment. The Company shall encourage a diverse workforce without any discrimination based on age, gender, sexual orientation, marital status, physical or mental disabilities, race, caste, colour, national or ethnic origin, religion or language. The Company encourages growth opportunities and career progression by prioritizing internal job opportunities wherever appropriate, irrespective of the identity and background of the employee.

CA Grameen's procurement practices shall ensure a diverse, fair and impartial assessment of all potential vendors and suppliers, shall prioritise environmentally friendly and energy-efficient products, and shall encourage local sourcing wherever practicable. The Company shall include environmental and social requirements in its vendor contracts, and reserves the right to seek information, evidence of compliance or corrective action, and to discontinue engagement in the event of material non-compliance. The Company shall progressively collect environmental and social information from its material value chain partners, including those accounting for a significant share of its purchases and sales, in line with the value chain disclosure requirements under the Securities and Exchange Board of India's ("SEBI") Business Responsibility and Sustainability Reporting framework, and shall report the coverage achieved to the CSR & ESG Committee of the Board.

Community Engagement

CA Grameen has always aligned business priorities with social commitments, targeting need-based interventions for community welfare in our operating geographies. The Corporate Social Responsibility (CSR) interventions are focused on enhancing the quality of life of the communities that are in the vicinity of the business location by way of creating awareness and providing support through various partnerships.

The Company's CSR program and initiatives include the following activities –

- i. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.
- ii. Promoting education, including training & special education and employment enhancing vocational skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- iii. Provided, notwithstanding the above, there is no restriction on the Company to undertake such other activities as may be allowed under Schedule VII of the Companies Act, 2013

Principle 9: Responsible Engagement and Value Creation for Customers

CA Grameen's larger thrust on financial inclusion and holistic development of customer families is effectively delivered through its customer-centric approach aligned with the unique needs of customer families. We embed the Client Protection Principles in our operations ensuring fair pricing, a strong code of conduct, ethical recovery practices, a responsive customer grievance system, and meaningful engagement with the communities we serve.

During the business, CA Grameen collects, stores, and processes data of its customers, which must be dealt securely. The Company remains committed to ensuring the privacy and security of the customer data by complying with its Data Privacy Policy and Cyber-Security Policy and implementing adequate processes to protect the personal and financial information of customers.

The Company has a "Fair Practices Code" in place, which elaborates on the loan processes. Through various public disclosures, the Company provides detailed and accurate information about loan products, pricing, and policies, maintaining transparency. Customers are thoroughly educated about the loan products, pricing, and other vital aspects at various stages. The Company's customer education initiatives also embrace broader topics such as sustainability, social awareness, sanitation, fostering holistic well-being etc.

The Company regularly engages with borrowers through feedback surveys to gauge their experiences with the Company's systems, processes, and loan products, helping identify gaps and opportunities for improvement. We use these insights to continuously refine our services, ensuring we meet the evolving needs of our customer base.

ESG Review and Continuous Improvement

The ESG policy will be reviewed by senior management on an annual basis to ensure its effectiveness, adherence to evolving laws and standards, suitability, and adequacy. The review will incorporate any improvements or changes in the system. In case of any non-compliances, CA Grameen will take corrective actions. The Company shall identify and correct non-compliances and take actions to mitigate their environmental and social effects. The Company shall investigate the non-compliances to determine their cause and take actions to avoid their recurrence. The corrective actions undertaken shall be duly recorded and the effectiveness of those actions will be reviewed on a periodic basis.