
NIYOGIN FINTECH LIMITED

POLICY ON CORPORATE SOCIAL RESPONSIBILITY

VERSION CONTROL

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V.1	Secretarial Accounts Department	/ May 08, 2026			Amendment

1. PREAMBLE

This Corporate Social Responsibility (“CSR”) Policy (“Policy”) has been framed in accordance with the provisions of Section 135 of the Companies Act, 2013 (“Act”) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

As a responsible Listed Non-Banking Financial Company (“NBFC”), Niyogin Fintech Limited (“Company”) recognizes its commitment towards sustainable development and inclusive growth. The Company aims to contribute meaningfully to society through focused CSR initiatives aligned with the requirements prescribed under Schedule VII of the Act.

2. OBJECTIVE OF THE POLICY

The objectives of this Policy are to:

- Define the CSR vision, guiding principles, and governance framework of the Company;
 - Outline the programs and projects to be undertaken by the Company as CSR activities;
 - Ensure compliance with the provisions of the Companies Act, 2013 and SEBI regulations applicable to listed entities;
 - Establish a transparent monitoring and reporting mechanism for CSR initiatives;
 - Create positive social, environmental, and economic impact in communities.
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3. DEFINITIONS

Unless the context otherwise requires:

- “Act” means the Companies Act, 2013 and rules made thereunder.
- “Board” means the Board of Directors of the Company.
- “CSR” means Corporate Social Responsibility as defined under Section 135 of the Act.
- “CSR Committee” means the Committee constituted by the Board pursuant to Section 135 of the Act.
- “Net Profit” shall have the meaning assigned under the Act.
- “Ongoing Project” means a multi-year project undertaken by the Company in fulfillment of its CSR obligations having timelines not exceeding three financial years excluding the year of commencement.

Words and expressions not defined herein shall have the meanings assigned under the Act and applicable rules.

4. APPLICABILITY

This Policy shall apply to all CSR initiatives and activities undertaken by the Company in India in accordance with Schedule VII of the Act.

5. CSR VISION

The Company endeavors to undertake socially impactful initiatives that foster financial inclusion, education, healthcare, environmental sustainability, skill development, and community welfare, thereby contributing to nation-building and inclusive economic growth.

6. FOCUS AREAS

The Company may undertake CSR activities in areas specified under Schedule VII of the Companies Act, 2013, including but not limited to:

a) Education and Skill Development

- Promoting education;
- Financial literacy programs;
- Digital education initiatives;
- Vocational and entrepreneurship training.

b) Healthcare and Sanitation

- Preventive healthcare initiatives;
- Access to healthcare services;
- Mental health awareness;
- Sanitation and hygiene programs.

c) Financial Inclusion

- Supporting underserved communities through financial awareness;
- Women empowerment through financial literacy;
- Rural development initiatives.

d) Environmental Sustainability

- Environmental conservation;
- Tree plantation drives;
- Renewable energy initiatives;
- Waste management programs.

e) Livelihood Enhancement

- Skill enhancement programs;
- Support to micro and small entrepreneurs;
- Employment-oriented training.

f) Social Welfare

- Disaster relief and rehabilitation;
- Support for differently abled persons;
- Senior citizen welfare;
- Women and child welfare.

g) Other Activities

Any other activities as may be permitted under Schedule VII of the Act from time to time.

7. CSR COMMITTEE

The CSR Committee shall be constituted by the Board in accordance with the provisions of the Act.

Roles and Responsibilities of the CSR Committee

The CSR Committee shall:

- Formulate and recommend the CSR Policy to the Board;
 - Recommend the amount of expenditure to be incurred on CSR activities;
 - Recommend and review CSR projects/programs;
 - Monitor implementation of CSR projects;
 - Review utilization of CSR funds;
 - Ensure compliance with applicable CSR provisions.
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8. ROLE OF THE BOARD

The Board shall:

- Approve the CSR Policy;
 - Ensure implementation of CSR activities;
 - Ensure spending of the prescribed CSR amount;
 - Disclose CSR composition, policy, and initiatives in the Board's Report and on the Company's website;
 - Monitor compliance with statutory requirements.
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9. CSR IMPLEMENTATION

The Company may undertake CSR activities:

- Directly by the Company; or

- Through:
 - 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
 - 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
 - any Entity established under an Act of Parliament or a State Legislature; or
 - 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 similar activities.
 - Any entity eligible under the applicable CSR Rules.

The Company may also collaborate with other companies for undertaking CSR projects.

10. CSR EXPENDITURE

The Company shall spend, in every financial year, at least 2% of the average net profits made during the three immediately preceding financial years in accordance with Section 135 of the Act.

Administrative overheads shall not exceed the limits prescribed under applicable law.

Any surplus arising out of CSR projects shall not form part of the business profits of the Company.

11. ANNUAL ACTION PLAN

The CSR Committee shall formulate and recommend to the Board an Annual Action Plan containing **subject to availability of any CSR amount:**

- List of approved CSR projects;
- Manner of execution;
- Modalities of utilization of funds;
- Monitoring and reporting mechanisms;
- Timelines for implementation.

The Board may alter the Annual Action Plan during the financial year based on reasonable justification.

12. MONITORING AND IMPACT ASSESSMENT

The CSR Committee shall institute a transparent monitoring mechanism for implementation of CSR projects.

Where applicable under law, the Company shall undertake impact assessment through an independent agency.

13. TREATMENT OF UN-SPENT CSR AMOUNT

Any unspent CSR amount shall be transferred and dealt with in accordance with the provisions of Section 135 of the Act and applicable rules.

14. DISCLOSURES

The Company shall make appropriate disclosures in:

- Board's Report;
- Annual Report;
- Corporate website;
- SEBI/stock exchange filings, wherever applicable.

The CSR Policy shall be displayed on the website of the Company.

15. AMENDMENTS

The Board may amend this Policy from time to time based on recommendations of the CSR Committee and in line with applicable laws and regulatory requirements.

16. EFFECTIVE DATE

This Policy shall come into effect from [●].

Annexure A – Indicative CSR Projects

Focus Area	Illustrative Activities
Education	Scholarships, school infrastructure, digital learning
Healthcare	Medical camps, health awareness, rural healthcare
Financial Inclusion	Financial literacy workshops, women entrepreneurship
Environment	Plantation drives, sustainability initiatives
Skill Development	Vocational training, employability programs