

## Corporate Social Responsibility Policy

### 1. TITLE

**Pay10 Services Private Limited (Formerly known as “Bhartipay Services Private Limited”)** (hereinafter referred to as “Company”) has developed a Corporate Social Responsibility Policy (hereinafter referred to as “Policy”).

### 2. PURPOSE

This policy defines the approach and direction of the company towards Corporate Social Responsibility in consonance of provisions of Company Act 2013 including the regulatory requirement, the governance mechanism and the guiding principle for selection, implementation & monitoring of CSR activities. In alignment with its objective, principles and values, for delineating its responsibility as a socially and environmentally responsible corporate citizen.

### 3. OBJECTIVE

The main objective of CSR policy is to make CSR a key business process for sustainable development of the society by:

- ensuring an increased commitment at all levels in the organisation, to operate its business in an economically, socially & environmentally sustainable manner, while recognising the interests of its stakeholders;
- strive for economic development that positively impacts society at large with minimal resource footprints.

### 4. GOVERNANCE STRUCTURE

The Board of Directors, Corporate Social Responsibility (CSR) Committee and Management Team constitutes the governance structure of Corporate Social Responsibility. As per Section 135 of the Companies Act and Rules thereof, CSR Committee is constituted and CSR activities are discharged by the CSR Committee subject to approval of the Board of Directors.

#### **A. Board of Directors:**

The Board of Directors shall,

- Upon the recommendation of CSR Committee, approve the CSR Policy, Annual Action Plan and projects for every financial year.
- Disclose in its Annual Report, the content of CSR Policy, composition of CSR Committee and report on Corporate Social Responsibility as per prescribed format.
- Undertake other roles and responsibilities as defined under Section 135 of the Company Act, 2013 & Rules thereof.

- review and approve the amendments in CSR policy, if required.

#### **B. CSR Committee of the Board**

The CSR Committee shall,

- Formulate the CSR Policy; review and revise the policy, if required,
- Review the CSR Annual Action Plan prepared in line with requirement of CSR Rules,
- Monitor the CSR performance, compliance with CSR Policy and applicable CSR provisions.

#### **C. Management Team**

The Management Team shall,

- Periodically review the progress of CSR activities done against approved allocated funds.
- Update the progress of CSR activities to the Board of Directors on Quarterly or Yearly basis.

### **5. ANNUAL ACTION PLAN**

**The company shall prepare an annual action plan for each financial year which shall include:**

- the list of CSR projects or programs from areas or subjects specified in Schedule VII of the Company Act, 2013.
- the manner of execution of such projects or programs as specified in rule 4(1) of CSR Rules.
- the modalities of utilisation of funds and implementation schedules for the projects or programs.
- monitoring and reporting mechanism for the projects or programs.
- details of need and impact assessment, if any, for the projects undertaken by the company.

### **6. FOCUS AREAS FOR CSR INTERVENTIONS**

The Company's CSR will focus on the following thrust areas:

- Contribution to the Prime Minister's National Relief Fund;
- Education: Promoting education of under privileged children;
- Environmental Sustainability: Ensuring environmental sustainability, animal welfare and conservation of natural resources;
- Support programs in eradicating hunger, poverty and malnutrition, promoting preventive healthcare, sanitation; and
- Supporting communities and regions affected by natural disaster.
- Any other areas specified in Schedule VII of Company Act, 2013.

The CSR Committee may consider new focus areas and recommend to the Board of Directors for inclusion in CSR Annual Action Plan

## **7. GUIDANCE WITH RESPECT TO CSR OBLIGATIONS, SELECTION, IMPLEMENTATION & MONITORING OF CSR ACTIVITIES**

### **A. CSR OBLIGATION:**

- The company is committed to spend at least 2% of its average net profit of three immediately preceding financial years.
- The overall amount to be committed for CSR may exceed 2% subject to approval of the CSR Committee and Board of Directors.
- The surplus arising out of the CSR activities shall not form part of the business profit of the company.
- If the obligatory CSR amount is not spent in any relevant financial year under certain circumstances, the Company shall ensure due compliance of the provisions related to unspent CSR amount as specified under Section 135 of Company Act 2013.
- Contribution to any political party, any one-off event or sponsorship to such event shall not be part of the company's CSR expenditure.

### **B. SELECTION OF CSR ACTIVITIES**

1. Selection of CSR activities will be based upon the needs of local community, key beneficiaries and desired impact on society and environment.
2. Selected activities shall be finalised after taking into consideration their alignment with:
  - CSR Focus areas of the Company,
  - The areas specified in Schedule VII of Company Act, 2013, and
  - The strategic directions received from the Board of Directors.

### **C. IMPLEMENTATION OF CSR ACTIVITIES**

1. The company shall undertake single year or multi-year activities in project mode.
2. CSR activities will be executed either directly or through implementation partners that meet the statutory eligibility criteria laid down under the Company Act, 2013 and Rules thereof.
3. The company shall conduct due diligence of implementation partner.
4. Implementation modalities, schedule of activities and manners of execution will be as per the details given in Annual Action Plan and approved by the Board of Directors.

### **D. MONITORING OF CSR ACTIVITIES**

1. The Board of Directors and CSR Committee will monitor the progress of CSR activities on quarterly or annual basis by seeking the report on progress/achievement from the management team and budget utilisation certificate from the Chief Financial Officer.
2. Management Team will review the progress of CSR Projects, track utilisation of funds, visit the project sites and take beneficiaries' feedback.

## **8. DISCLOSURE & TRANSPARENCY**

- Company shall disclose the composition of its CSR Committee, the CSR Policy and the projects approved by the Board of Directors on its website.
- The company shall also abide by and fulfill all reporting compliances required under Company Act 2013 and rules thereof.

## **9. LIMITATION & AMENDMENTS**

1. The Board of the Company may in their discretion and/or on recommendation of the CSR Committee, can make changes/modification and/or amendments to this Policy from time to time.
2. In the event of any conflict in provisions of the policy and statutory requirements, the regulatory provisions defined under Company Act 2013 shall prevail and will be automatically applicable to this policy.
3. In the event of any amendment to the Company Act 2013, this Policy shall be deemed to have been amended accordingly.

## **10. CAPITAL ASSETS**

Capital asset acquired or created by CSR projects should be held by the beneficiaries of the said CSR project or a trust or a public authority for the benefits of all. The company should take appropriate measure to ensure that such assets are utilized for the purpose it was meant for and should not be transferred or disposed off without prior permission of the company.

## **11. EFFECTIVE DATE OF POLICY**

The CSR Policy has been approved by the Board of Directors and it is effective from 18<sup>th</sup> February, 2026.

### **Earlier Versions:**

| S.N. | Name of Version         | Effective From |
|------|-------------------------|----------------|
| 1.   | 1 <sup>st</sup> Version | 25/04/2022     |
| 2.   | 2 <sup>nd</sup> Version | 12/04/2023     |
| 3.   | 3 <sup>rd</sup> Version | 03/07/2024     |
| 4.   | 4 <sup>th</sup> Version | 01/05/2025     |
| 5.   | 5 <sup>th</sup> Version | 18/02/2026     |