



PB FINTECH LIMITED

BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORTING POLICY

1. BACKGROUND

The Ministry of Corporate Affairs (MCA), Government of India, released a set of guidelines in 2011 called the National Voluntary Guidelines on the Social, Environmental and Economic Responsibilities of Business (NVGs). This was expected to provide guidance to businesses on what constitutes responsible business conduct. In order to align the NVGs with the Sustainable Development Goals (SDGs) and the 'Respect' pillar of the United Nations Guiding Principles (UNGP) the process of revision of NVGs was started in 2015. After revision and updation, the new principles are called the National Guidelines on Responsible Business Conduct (NGRBC) 2018.

The primary rationale for the update is to capture key national and international developments in the sustainable development agenda and business responsibility field that have occurred since the release of the NVGs in 2011. Some of the key drivers of the NGRBC are given below:

1. The UN Guiding Principles for Business and Human Rights (UNGPs)
2. UN Sustainable Development Goals (SDGs)
3. Paris Agreement on Climate Change (2015)
4. Core Conventions 138 and 182 on Child Labour by the International Labour Organization (ILO)
5. Annual Business Responsibility Reports (ABRRs)
6. Companies' Act 2013

Further, Securities and Exchange Board of India (SEBI) vide Circular dated May 10, 2021 amended Regulation 34 of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 and has made Business Responsibility & Sustainability Report (BRSR) mandatory for Top 1000 listed entities by market capitalization with effect from 2022-23.

The BRSR is a notable departure from the existing Business Responsibility Report ("BRR") and a significant step towards bringing sustainability reporting at par with financial reporting. SEBI Circular further states that The BRSR is an initiative towards ensuring that investors have access to standardized disclosures on ESG parameters. Access to relevant and comparable information will enable investors to identify and assess sustainability-related risks and opportunities of companies and make better investment decisions.

PB Fintech Limited ("the Company") being one of the top one thousand listed company has approved and adopted this policy at the meeting of board of directors held on 10th February 2023, being the effective date of the Policy.

2. OBJECTIVES

The key objective of this policy is to reaffirm the Company's commitment to follow the principles laid down in National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business. This policy will help company to deal with the complexities and challenges that keep emerging in the conduct of its business.

3. APPLICABILITY

This policy applies to the directors and employees of the Company and across all its functions and branches and shall also be applicable to all the subsidiaries of the Company.



This policy encourages us to ensure that not only do we follow these guidelines in business contexts directly within our control or influence, but that we also encourage and support our suppliers, vendors, distributors, partners and other collaborators to follow them.

4. DEFINITIONS

- i. “Board” shall mean the Board of Directors of the Company.
- ii. “Companies Act” shall mean the Companies Act, 2013 and rules notified thereunder.
- iii. “Listed Entity/Company” shall mean PB Fintech Limited.
- iv. “Policy” shall mean the Business Responsibility Policy.

5. IMPLEMENTATION OF THE POLICY

The Board of Directors of the Company in its meeting held on 10th February, 2023 reconstituted a Business Responsibility and Sustainability Reporting Committee (“BRSRC”) to be responsible for implementation of Business Responsibility and Sustainability Reporting Policy.

Details of BRSR Committee are:

1. Mr. Yashish Dahiya – Chairman & CEO
2. Mr. Alok Bansal – Whole Time Director
3. Mr. Sarbvir Singh–Director
4. Mr. Mandeep Mehta–Group CFO
5. Mr. Naveen Kukreja-Whole Time Director & CEO of Paisabazaar Marketing and Consulting Pvt Ltd.

Mr. Yashish Dahiya shall be the Chairman of the said Committee. He has also been designated as the Business Responsibility and Sustainability Reporting Head for the purpose of this policy.

The Company Secretary shall be the Secretary of the Committee.

The Business Responsibility and Sustainability Reporting Head may take support of such functional head and internal and external experts as he deems fit, for the effective implementation of the policy.

6. PRINCIPLES TO ASSESS COMPLIANCE WITH ENVIRONMENTAL, SOCIAL AND GOVERNANCE NORMS

Company believes that the business excellence can be achieved only by doing business on sound sustainability principles that address the dimension of good governance as well as environmental and social responsibility. Company’s Business practices would therefore be governed by the following guiding principles:

Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability

The Company shall conduct and govern the Business to ensure the Ethics, Transparency and Accountability by:

- i. Creating necessary governance structures, procedures and practices to ensure ethical conduct at all levels and Promote the adoption of this principle across the value chain.
- ii. Transparently communicating and allowing access to information about the decisions that impact relevant stakeholders.
- iii. Not engaging in practices that are abusive, corrupt, or anti-competition.
- iv. Truthfully discharging responsibilities on financial and other mandatory disclosures.
- v. Reporting on the status of the adoption of these Guidelines, as necessary.
- vi. Avoiding complicity with the actions of any third party that violates any of the principles of Business responsibility contained in these Guidelines.



- vii. Encourage its business partners and third parties with whom it conducts business to abide by this policy.
- viii. Encourage its employees to report genuine concerns of misconduct/ unlawful conduct in a responsible and confidential manner under Whistle Blower mechanism.

Principle 2: Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle

The Company shall provide goods and services that assure safety and contribute to sustainability throughout their life cycle by:

- i. Ensuring Safety and optimal use of resources while providing services, disposing the Bio Medical Waste and ensure that everyone connected with it, value chain members, customers and recyclers are aware of their responsibilities.
- ii. Raising consumer awareness with regard to their rights, through education, appropriate and helpful marketing communication, full details of the contents and composition and promotion of services.
- iii. Ensuring that the services consider resource efficiency and principles of sustainability.
- iv. Conducting regular reviews to improve upon the process of new technology development, deployment and commercialization, as well as incorporating social, ethical, and environmental considerations.
- v. Recognizing and respecting the rights of people who may be owners of traditional knowledge, and other forms of intellectual property.
- vi. Recognizing that over-consumption results in unsustainable exploitation of our planet's resources, and therefore to promote sustainable consumption, including recycling of resources.

Principle 3: Businesses should promote the wellbeing of all employees

The Company shall promote the wellbeing of all employees by:

- i. Ensuring equal opportunities at the time of recruitment as well as during the course of employment and separation without any discrimination irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
- ii. Ensuring that there is no deployment of child labour, forced labour or any form of involuntary labour, paid or unpaid.
- iii. Taking cognizance of the work-life balance of its employees, especially that of women.
- iv. Providing facilities for the wellbeing of the employees including those with special needs.
- v. Ensuring timely payment of fair living wages to meet basic needs and economic security of the employees.
- vi. Providing a workplace environment that is safe, hygienic humane, and which upholds the dignity of the employees.
- vii. Ensuring awareness of these provisions to the employees and training them on a regular basis. Ensuring continuous skill and competence up-gradation of all employees by providing access to necessary learning opportunities, on an equal and nondiscriminatory basis. Promoting employee morale and career development through enlightened human resource interventions.
- viii. Creating systems and practices to ensure a harassment free workplace where employees feel safe and secure in discharging their responsibilities. Respecting the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance Redressal mechanisms.
- ix. Strictly abiding with the rules and regulations stipulated by the governments including minimum wages to be paid to the employees and workers. Promote work-life balance among all its employees



Principle 4: Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized

The Company shall respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized by:

- i. Systematically identifying stakeholders, understanding their concerns, defining purpose and scope of engagement, and commitment to engage with them.
- ii. Acknowledging responsibility and be transparent about the impact of the policies, decisions, product & services and associated operations on the stakeholders.
- iii. Giving special attention to stakeholders in areas that are underdeveloped.
- iv. Resolving differences with stakeholders in a just, fair and equitable manner.

Principle 5: Businesses should respect and promote human rights

The Company shall respect and promote human rights by:

- i. Understanding the human rights principles, laws and policies, as well as acknowledging that, human rights are inherent, universal, indivisible and interdependent in nature.
- ii. Integrating the principles of human rights in management systems, in particular by way of assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.
- iii. Promoting awareness and realization of human rights across the value chain, which is within the sphere of our influence.
- iv. Not being complicit with human rights abuses by a third party. Encourage its business partners and third parties with whom it conducts business to abide by this policy.

Principle 6: Business should respect, protect, and make efforts to restore the environment

The Company shall respect, protect, and make efforts to restore the environment by:

- i. Utilizing natural and manmade resources in an optimal and responsible manner and ensure the sustainability of resources by reducing, reusing, recycling and managing waste.
- ii. Taking measures to check and prevent pollution.
- iii. Assessing the environmental damage and bearing the cost of pollution abatement with due regard to public interest, wherever possible.
- iv. Ensuring that, benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
- v. Continuously seeking to improve environmental performance by promoting use of energy efficient and environment friendly technologies and use of renewable energy.
- vi. Proactively persuading and supporting the value chain to adopt this policy.
- vii. Develop environment management systems and contingency plans and processes that shall help it in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to its operations.

Principle 7: Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner

The Company shall behave responsibly when involved in influencing public and regulatory policy by:

- i. Ensuring that while pursuing policy advocacy, the advocacy positions ethical and are consistent with the Policies.
- ii. Utilizing to the extent possible, trade and industry chambers and associations and other such collective platforms to undertake policy advocacy.
- iii. To strive to balance the interests of its stakeholders, treating each of them fairly and avoiding unfair discrimination of any kind.



Principle 8: Businesses should support inclusive growth and equitable development

The Company shall support inclusive growth and equitable development by:

- i. Understanding the impact on social and economic development and respond through appropriate action to minimize the negative impacts.
- ii. Innovating and investing in products, technologies and processes that promote the wellbeing of society.
- iii. While operating in regions that are underdeveloped, be especially sensitive to local concerns.
- iv. Undertaking CSR activities in accordance with Schedule VII of the Companies Act, 2013, as per the recommendation of the CSR committee and as per the CSR policy of the Company.

Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner

The Company shall engage with and provide value to the customers and consumers in a responsible manner by:

- i. Ensuring to take into account the overall well-being of the customers as well as society at large, while serving the needs of the customers.
- ii. Ensuring to not restrict the freedom of choice and free competition in any manner while designing, promoting and selling the products.
- iii. Making full disclosures of all information truthfully and factually, through labelling and other means, including the risks to the individual to society and to the planet from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner.
- iv. Exercising due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
- v. Providing adequate grievance handling mechanisms to address customer concerns and feedback.

7. REVIEW AND AMENDMENTS

The Board reserves the power to review and amend this Policy from time to time. All provisions of this Policy would be subject to revision / amendment in accordance with applicable laws as may be issued by relevant statutory and regulatory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant statutory and regulatory authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.