



## **CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY**

### **1. PREAMBLE:**

Corporate Social Responsibility (CSR) is the responsibility of the corporate entity towards the society in consideration of the support given and sacrifices made by the society by sharing part of its profit.

**PB Fintech Limited (formerly known as “Etechaces Marketing and Consulting Private Limited”)** (hereinafter called as “the Company” or “PBFL”), is engaged in the business of online marketing, data analytics, emailer services, marketing support and e-commerce platform development.

Being one of the leading e-commerce and a Fintech Company, PBFL believes that this position brings both opportunity and responsibility. PBFL believes in applying its skills and resources where it can make the greatest impact on the society. It also believes that in alignment with its vision, it will continue to enhance value through its CSR initiatives and promote social sustainability, sustainable development of the environment and social welfare of the people and society at large, more specifically for the deprived and underprivileged persons.

The policy for Corporate Social Responsibility is designed and governed with a clear focus on promoting education in India, including giving special attention towards education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled, healthcare, protection of natural resources, etc. The initiatives taken by PBFL are in consonance with projects and programs relating to activities specified under Schedule VII to the Companies Act, 2013 (“Act”) and Companies (Corporate Social Responsibility Policy) Rules, 2014 (“Rules”).

### **2. OBJECTIVE**

The main objective of CSR Policy is to lay down guidelines for the company to make CSR a key business process for sustainable development of the society. It aims at enhancing welfare measures of the society based on the immediate and long term social & environmental consequences of its activities.

### **3. OUR APPROACH TO IMPLEMENTATION**

- The investment in CSR will be project based and time framed periodic milestones for every project will be finalized at the outset.
- Project activities identified under CSR shall be implemented by the Company, incorporated Trust, Section 8 companies under Companies Act, 2013 or other recognized Association of Persons including NGO’s. Such agencies could be work singly or in tandem with other agencies.

### **4. FUNDING & ALLOCATION:**

The Corpus for the purpose of carrying on the aforesaid activities shall include the following:



- 2% of the average Net Profits of the Company during immediately preceding three financial years.
- Surplus arising out of CSR activities carried out by the Company and such surplus will not be part of business profit of the Company.

##### **5. AREAS OF FOCUS:**

The Policy recognises that Corporate Social Responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged by one or more of the following focus areas as notified under Section 135 read with Schedule VII of the Companies Act 2013 and the Companies (Corporate Social Responsibility Policy) Rules 2014:

1. Eradicating hunger, poverty, and malnutrition, promoting preventive health care and sanitation, including contribution to the Swach Bharat Kosh set up by the Central Government for the promotion of sanitation and making available safe drinking water;
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air, and water, including contribution to the Clean Ganga Fund set up by the Central Government for rejuvenation of the river Ganga;
5. Protection of national heritage, art, and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
6. Measures for the benefit of armed forces veterans, war widows, and their dependents, Central Armed Police Forces and Central Para Military Forces veterans, and their dependents, including widows;
7. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
8. Contribution to the Prime Minister's National Relief Fund or PM CARES Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Caste, the Scheduled Tribes, other backward classes, minorities, and women;



9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government.
10. Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
11. Rural development projects.
12. Slum area development.
13. Disaster management, including relief, rehabilitation and reconstruction activities.
14. Any other Projects/activities the Government may add from time to time to the Schedule VII of the Companies Act, 2013 or allow through clarifications/ Circulars.
15. Any ancillary or incidental activities required to be performed to undertake any of the projects mentioned above subject to the prior approval of the CSR Committee.

The above list of activities is illustrative and not exhaustive. The CSR Committee may consider CSR activities not falling in the above list subject to the condition that such activities related to the subjects enumerated in Schedule VII of the Act.

CSR activities shall be undertaken as projects, programs or activities (either new or ongoing) excluding activities undertaken in pursuance of the normal course of business of the Company.

## **6. MONITORING**

### **a. Governance Structure**

In compliance with the requirement of Section 135 of the Companies Act 2013, the Company has constituted a robust and transparent governance structure to oversee the implementation of its CSR Policy.



**b. Board level CSR Committee**

At PBFL, the CSR governance structure will be headed by its Board level CSR Committee which will be ultimately responsible for the CSR projects undertaken. The committee will be report to the Board of Directors of PBFL.

The Board of Directors may nominate/substitute any of its members to the committee.

**7. ROLE OF THE CSR COMMITTEE**

- a) To formulate and recommend to the Board of Directors, the CSR Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Act and the applicable Rules;
- b) To recommend CSR activities to be undertaken by the Company in collaboration with PBFL affiliate companies or any other company or any other entity;
- c) To recommend the amount of expenditure to be incurred on the CSR activities;
- d) To formulate the CSR Budget based on the CSR activities planned for the year;
- e) To create an effective due diligence and monitoring mechanism for implementation of the approved CSR activities;
- f) To submit reports to the Board of Directors in respect of the CSR activities undertaken by PBFL, and
- g) To decide on the locations for CSR activities. approve the CSR programs for PBFL.

**8. REVIEW MECHANISM AND CUSTODY**

In accordance with Schedule VII of the Act and the Rules, PBFL will undertake CSR activities included in its plan for that year, as recommended by the CSR Committee at the beginning of each year. The Committee is authorized to approve any modification to the existing CSR plan or to propose any new program during the financial year under review. The CSR Committee shall institute a transparent monitoring and review mechanism for implementation of the CSR projects or programs or activities undertaken pursuant to this policy. The review may range from local and regional level MIS and exception reporting to senior level review on a periodical basis, designing the action plans and monitoring their achievements and reporting back to the CSR Committee and finally to the Board. The activity planned for the year will be reviewed once in each financial year by the CSR committee, which in turn may present the annual agenda to the Board of Directors, for adoption and approval for each financial year. The CSR Committee may require Project Appraisal of its CSR activities/ project to be carried out by External Agencies/ Third parties Agency, if required.

This policy shall be kept in the custody of Compliance Officer of the Company.



The Company will report, the details of CSR initiatives and activities of the Company in the Directors' Report and on the website of the Company ([www.pbfintech.in](http://www.pbfintech.in)) as required under the Regulations.

#### **9. UPKEEP AND MAINTENANCE OF ASSETS CREATED**

Maintenance of assets created under CSR would be responsibility of the concerned Section 8 Company/ Trust/ Society/ NGO's/ other recognized Association of Persons etc. implementing the CSR activities.

#### **10. AUDIT**

All CSR activities and expenses made thereon will be subject to audit by the Company's auditors.

The Company will undertake Social Audit of Projects implemented under its CSR programme through an independent agency after 1-2 years of completion of the project so as to assess the effect of CSR intervention.

#### **11. AMENDMENTS TO THE POLICY**

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this Policy, as and when required as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Act on the subject as may be issued from relevant statutory authorities, from time to time.

**This policy has been amended and approved by the Board of Directors of the Company on July 26, 2021.**