

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY
OF
FINDOC FINVEST PRIVATE LIMITED

Version Control	Proposed By	Date of approval by the Board of Directors
1.0	CSR Committee members	September 03, 2025

Restated in supersession to earlier CSR Policy

Website: www.findocinvest.com

Regd. & Corp. Office: 5th Floor, Property No. B-19-347, Village Taraf Karabara, Ferozpur Road, Ghumar Mandi, Bharat Nagar Chowk, Ludhiana- 141001, Punjab, India

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Our Presence: Punjab and Haryana

1. Introduction

Findoc Finvest Private Limited (hereinafter referred as “FFPL” or “the Company”), being a responsible corporate citizen of India, is committed to contributing towards sustainable economic, environmental and social development. This Corporate Social Responsibility (“CSR”) Policy has been formulated and implemented in accordance with the applicable provisions of Section 135 of the Companies Act, 2013 (the “Act”), the Companies (CSR Policy) Rules, 2014 (the “Rules”) and Schedule VII of the Companies Act, 2013 (the “Schedule”).

This Policy outlines the Company’s CSR vision, framework, governance structure and implementation approach.

2. CSR Vision of FFPL

To create a positive and lasting impact on society by supporting initiatives that promote equitable development, social welfare, health & hygiene and environmental sustainability, particularly in communities where the Company operates.

3. CSR Mission of FFPL

To implement CSR programs that are transparent, accountable and aligned with society’s priorities.

4. Applicability

Section 135(1) of the Act notifies that the Companies having Net worth of INR 500 Crores or more or Turnover of INR 1000 Crores or more or Net Profit of INR 5 Crores or more during the immediately preceding financial year shall be required to constitute a Corporate Social Responsibility Committee of the Board of Directors (“Board”), hereinafter referred as “CSR Committee”.

The Company covered under the Section 135(1) shall be required to do following activities:

- i) The Company shall be required to Constitute Corporate Social Responsibility Committee of the Board.
- ii) The Company shall be required to prepare Corporate Social Responsibility Policy.
- iii) The Company shall disclose the compositions of the CSR Committee and other details as specified in Corporate Social Responsibility Rules, 2014 in the Board's report.

The Company shall spend, in every financial year, at least two per cent of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.

5. CSR Committee

The composition, roles and responsibilities of the CSR Committee are detailed in the CSR Committee Charter, enclosed with this Policy as **Annexure-A**

6. CSR Budget and Spending

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1. Pursuant to the applicable provisions of Section 135, Rules and Schedule VII of the Companies Act, 2013, the Company shall spend, in every financial year, at least 2% of the average net profits of the preceding three financial years on CSR activities.
2. In accordance with Section 135(5) of the Act, any unspent CSR amount other than for ongoing projects shall be transferred to a Fund specified in Schedule VII within 6 months from the end of the financial year.
3. Further, as per Section 135(6), any unspent CSR amount relating to ongoing projects shall be transferred to a special '**Unspent CSR Account**' within 30 days from the end of the financial year and shall be spent within the within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.
4. Surplus arising out of CSR activities shall not form part of business profits and shall be:
 - ploughed back into the same project, or
 - transferred to the Unspent CSR Account, or
 - transferred to a Schedule VII fund.
5. Any Capital assets created from CSR funds shall be held as per Rule 7(4) of CSR Rules.

7. CSR Activities

The Company shall undertake such CSR activities as recommended by the CSR Committee and approved by the Board from time to time pursuant to Schedule VII and Section 135 of the Act read with CSR Rules framed thereunder.

1. Eradicating hunger, poverty and malnutrition and promoting Healthcare & Sanitation
2. Promoting Education, Skill Development & Livelihood Enhancement
3. Promoting Gender equality measures for reducing inequalities faced by socially and economically backward groups.
4. Environmental Sustainability
5. Protection of national heritage, art and culture
6. Measures for the benefit of armed forces veterans, war widows and their dependent
7. Training to promote sports
8. Supporting Government Relief Efforts
9. Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine

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10. Rural Development Projects
11. Slum area development.
12. Disaster Management
13. Any other activities, as may be prescribed by the Act or any other laws.

Exclusions (Not Considered as CSR)

As per Rule 2(1)(d) of the Companies (Corporate Social Responsibility Policy) Rules, 2014:

- Activities undertaken in the normal course of business (except eligible R&D exemptions).
- Activities outside India (except for training of Indian sportspersons).
- Contributions to political parties.
- Activities benefitting employees and their families.
- Sponsorship activities intended solely for marketing benefits.
- activities carried out for fulfilment of any other statutory obligations under any law in force in India

8. CSR Implementation

In pursuance to the Rule 4 of The Companies (Corporate Social Responsibility Policy) Rules, 2014, the Board shall ensure that the CSR activities may be undertaken by the Company either itself or through:

- Registered public trusts or societies,
- Section 8 companies,
- Entities registered with MCA through Form CSR-1.
- Preference shall be given to local areas and regions where the Company operates, in alignment with Section 135(5) of the Act.
- The Company may collaborate with other companies for undertaking CSR projects.
- All CSR entities and expenditure shall comply with prescribed due diligence, registration and audit requirements.

9. Monitoring and Reporting

The CSR Committee/Board will ensure effective monitoring of all CSR Activities, including utilization of funds to ensure their effective implementation in accordance with the Section 135 of the Act read with CSR Rules framed thereunder:

- Periodic progress reports from implementing agencies.
- Field visits and impact assessments (if applicable as provided under Rule 8(3)).
- Annual review of CSR spent and effectiveness.

The Company shall include an Annual CSR report in the Board's Report as mandated under Rule 8 of CSR Rules.

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10. Impact Assessment

Where applicable, the Company will undertake impact assessments of CSR projects having outlays of ₹1 crore or more, as required under Rule 8(3). The findings shall be annexed to the annual report.

12. Display of CSR Policy

As per requirements of the Act, the following shall be published on the Company's website:

- CSR Policy
- CSR Committee composition
- CSR projects approved by the Board

13. Policy Review and Amendments

The CSR Committee shall review the Policy from time to time and recommend changes to the Board. The Board may amend the Policy as required to comply with applicable laws or internal objectives.

If at any point a conflict of interpretation / information between the policy and any regulations, rules, guidelines, notification, clarifications, circulars, master circulars/ directions issued by relevant authorities ("Regulatory Provisions") arises, then interpretation of the Regulatory Provisions shall prevail.

In case of any amendment(s) and/or clarification(s) to the Regulatory Provisions, the policy shall stand amended accordingly from the effective date specified as per the Regulatory Provisions.

14. Effective Date

This CSR Policy shall be effective from the date of approval by the Board and shall supersede all previous versions approved by the Board.

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Annexure-A**CORPORATE SOCIAL RESPONSIBILITY (CSR) COMMITTEE CHARTER
OF FINDOC FINVEST PRIVATE LIMITED****Updated and Approved by the Board of Directors on- September 17, 2025**

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1. Introduction

This Corporate Social Responsibility (CSR) Charter lays down the governance structure, principles, and framework for the effective implementation of CSR initiatives of Findoc Finvest Private Limited (“**FFPL**” or “**the Company**”).

It operationalises the CSR Policy of the Company and serves as a reference for the CSR Committee, Board and management of the Company to plan, execute, monitor, and report CSR activities in accordance with the Companies Act, 2013 (“**Act**”) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (“**CSR Rules**”), as amended.

2. Objectives

- To align CSR programs with Schedule VII of the Companies Act, 2013.
- To ensure transparency, accountability, and periodic monitoring of CSR initiatives.
- To integrate responsible social behavior into the Company’s culture and operations.
- To ensure that CSR obligations are met through expenditure in line with the applicable provisions of the Companies Act, 2013

3. CSR Governance Structure

(a.) CSR Committee

The CSR Committee shall comprise the following members*:

S.No.	Name	Designation
1.	Mr. Hemant Sood, Executive Director	Chairperson & Member
2.	Ms. Sonia Aggarwal, Executive Director	Member

**Revised Composition approved by the Board on September 17, 2025*

(b.) Board of Directors

- Holds overall responsibility for ensuring that CSR activities are undertaken in accordance with the applicable provisions of the Act, CSR Rules, and Company’s CSR Policy.
- Approves the CSR Policy, Annual Action Plan, and CSR expenditure as recommended by the CSR Committee.
- Ensures that the CSR obligations are duly disclosed in the Board’s Report and on the Company’s website.

4. Minutes of CSR Committee

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- The draft minutes of the Committee meeting shall be circulated by to all the members **within 15 days** from the date of meeting and the members shall provide their respective comments/inputs on such draft minutes **within 7 days** from the date of receiving such draft minutes.
- The minutes of the Committee meeting shall be signed by the Chairperson of that Committee meeting or Chairperson of subsequent Committee meeting and shall be placed in the next Committee meeting and Board meeting for take note of the members and Directors respectively.

5. Functions of CSR Committee

The CSR Committee shall perform inter-alia, the following functions: -

- Formulate and recommend to the Board the CSR Policy and any amendments thereto.
- Formulate and recommend an Annual CSR Action Plan, detailing projects, budget, and implementing modalities.
- Recommend CSR expenditure for each financial year, if applicable.
- Monitor the progress of CSR initiatives and ensure alignment with approved activities.
- Submit Reports on CSR performance to the Board.
- Ensure Compliance with the provisions of Section 135, The Companies (Corporate Social Responsibility Policy) Rules, 2014, Schedule VII and other applicable provisions of the Companies Act, 2013 and Rules made thereunder and CSR Policy.

6. Limitation, Review and Amendments

In the event of any conflict between the provisions of this Charter and of the applicable laws, the provisions of applicable laws shall prevail over this Charter. Any subsequent amendment / modification to the applicable laws shall automatically apply to this Charter.

The CSR Committee may review this Charter periodically and recommend amendments, if any therein, for the approval of Board of Directors from time to time, as may be deemed necessary.

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