

EPIMONEY PRIVATE LIMITED

Corporate Social Responsibility Policy (“CSR Policy”)

Detailed Policy Document

EPIMONEY PRIVATE LIMITED

CSR Policyss

Version	Policy changes	Document Author	Approval Date	Approved By
1.0	Initial Policy	Secretarial and Finance Team	July 24, 2025	Board of Directors

TABLE OF CONTENTS

Sr. No	Particulars	Page No.
1	Legal Framework	4
2	CSR Activities	4-6
3	Governance	6
4	Annual Action Plan: Guiding Framework and functions/ roles and responsibilities of the Board thereon	6-7
5	CSR Obligation, Selection, and Implementation	7-8
6	Disclosures	8
7	Review & amendment of the policy	9

1. LEGAL FRAMEWORK:

The Companies Act, 2013 (the “Act”) has made it mandatory for certain companies to carry out its Corporate Social Responsibility activities in accordance with Section 135 of the Act read with Schedule VII of the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the “Rules”) including any statutory modifications, amendments, or re-enactments of any of them for the time being in force. In order to comply with the requirements of the law, the Board of Directors (the “Board”) of Epimoney Private Limited (the “Company”) has adopted the Corporate Social Responsibility Policy (the “Policy”) and procedures with regard to the Company’s social responsibility:

a) Corporate Social Responsibility Philosophy and Objective:

The Company strives to be a socially responsible and strongly believes in development which is beneficial for the society at large as a part of its Corporate Social Responsibility (“CSR”). The objective of this Policy is to set guiding principles for carrying out CSR activities by the Company and also to set up process of execution, implementation and monitoring of the CSR activities to be undertaken by the Company.

b) Applicability:

The Company satisfying any of the following criteria during the immediately preceding financial year is required to comply with CSR provisions specified under Section 135(1) of the Act, read with the Rules made thereunder:

- i. net worth of rupees five hundred crore or more, or
- ii. turnover of rupees one thousand crore or more, or
- iii. net profit of rupees five crore or more.

2. CSR ACTIVITIES:

A. The Company shall undertake any of the following projects or programs or activities as prescribed under the Schedule VII of the Act as amended from time to time. An illustrative list of such areas or subjects is outlined below:

- i. Eradicating hunger, poverty and malnutrition, promoting health care, including 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.
- ii. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- iii. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- iv. 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 river Ganga.
- v. 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.

- vi. Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows.
- vii. Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports.
- viii. Contribution to the Prime Minister’s National Relief Fund or Prime Minister’s Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central government for socio-economic development and relief and welfare of the scheduled castes, the scheduled tribes, other backward classes, minorities and women.
- ix. (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) 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)
- x. Rural development projects.
- xi. Slum area development.

(slum area shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force)
- xii. Disaster management, including relief, rehabilitation and reconstruction activities.

All other activities which form part of CSR as per Schedule VII of the Act and the rules made thereunder as amended from time to time.

B. Exclusions:

The following activities shall not be considered as CSR activities pursuant to Rule 2 (1) (d) of the Companies (Corporate Social Responsibility Policy) Rules, 2014:

- i. Activities undertaken in pursuance of the Company’s normal course of business.
- ii. Activities undertaken outside India except training of Indian sports personnel outside India who is representing any State or Union Territory at national level or India at international level.
- iii. Activities that benefit the employees of the Company and their families.
- iv. Contribution of any amount directly or indirectly to any political party under section 182 of the Act.
- v. Activities supported by the Company on sponsorship basis for deriving marketing benefits for its products

or services.

- vi. Activities carried out for fulfilment of any other statutory obligations under any law in force in India.

The surplus, if any, arising out of the CSR projects/ programmes/ activities shall not form part of the business profit of the Company.

3. GOVERNANCE

- i. The CSR Committee formation is not mandatory where the amount required to be spent by a Company on CSR does not exceed fifty lakh rupees and the functions of the CSR Committee, in such cases, shall be discharged by the Board of the Company.
- ii. The current CSR Governance structure in the Company is overseen by two of the Directors, nominated by the Board jointly until the formal constitution of the CSR Committee.
- iii. The CSR Committee of the Company, as and when become applicable, shall consist of minimum three or more Directors, out of which atleast one director shall be an Independent Director. The Company Secretary shall act as the Secretary to the Committee.

4. ANNUAL ACTION PLAN: GUIDING FRAMEWORK AND FUNCTIONS/ ROLES AND RESPONSIBILITIES OF THE BOARD THEREON:

- i. All CSR activities shall be undertaken in accordance with Schedule VII of the Act, , and shall exclude activities prohibited under the amended CSR Rules.
- ii. Preference shall be given to CSR initiatives in areas surrounding the Company's operations to maximize local impact.
- iii. CSR activities may be carried out directly by the Company or through eligible implementing agencies, ensuring transparency and accountability.
- iv. Subject to the provisions of the Act, the Company may allocate CSR funds towards the creation or acquisition of capital assets, provided they are held by eligible entities or beneficiaries as specified in the CSR Rules.
- v. Administrative overheads incurred in pursuance of CSR activities shall not exceed five percent of the total CSR expenditure of the Company for the financial year.
- vi. Any surplus arising out of CSR projects shall not form part of the business profit of the Company and shall be plowed back into the same project or transferred to the Unspent CSR Account for future utilization.
- vii. The Company shall transfer any unspent CSR amount to the Unspent CSR Account within 30 days from the end of the financial year and ensure its utilization in accordance with the CSR policy.
- viii. The Board shall monitor and review the performance and impact of the CSR programmes, provide input and course corrections if required and satisfy itself that the CSR funds so disbursed are aligned to the CSR Policy of the Company and have been utilized for the purposes and in the manner as approved by it.
- ix. The Chief Financial Officer (CFO)/or the person responsible for financial management shall certify to the fact that CSR funds so disbursed have been utilised for the purposes and in the manner approved by the Board.

- x. Formulation and recommendation to the Board an annual action plan as per the provisions of the Act;
- xi. Recommendation of any alteration in the annual action plan at any time during the year and update, if any, required to the CSR Policy outlining the following;
 - a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - b) the manner of execution of such projects or programmes;
 - c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - d) monitoring and reporting mechanism for the projects or programmes; and
 - e) details of need and impact assessment, if any, for the projects undertaken by the Company.
- xii. Implementation and monitoring of the CSR activities as per the annual action plan;
 Recommend the annual CSR expenditure budget to the Board for approval with details of projects or activities proposed to be undertaken;
- xiii. Undertake impact assessment through third parties for CSR projects whenever the Company have an average CSR obligation of ten crore rupees or more;
- xiv. Ensure implementation of CSR activities of the Company within the applicable framework;
- xv. Determine the overall scope of, provide input on, and recommend adoption of the CSR report to the Board of the Company;
- xvi. Maintaining records (documents, receipts, MOUs with implementing agencies, etc.) for audit and regulatory purposes.
- xvii. Performance of such other functions as may be necessary under any statutory or other regulatory requirements to be performed by the Committee and as delegated by the Board from time to time.

5. CSR OBLIGATION, SELECTION, AND IMPLEMENTATION:

A. CSR Obligation:

The Board of the Company shall ensure that 2% of average net profits during the three immediately preceding financial years are spent on CSR initiatives undertaken by the Company. If the Company spends any amount over and above such 2% of average net profits, the same is to be considered as excess CSR expenditure which can be set-off in the immediate succeeding three financial years subject to the conditions as prescribed under the Act.

In order to compute whether the Company has under spent or overspent the CSR funds, the following shall be considered:

- i. **Project Cost** – it shall include designing, implementation, monitoring and evaluation cost incurred directly or indirectly on the project
- ii. **Administrative Overheads** – to ensure that such expenses shall not exceed 5% of the total CSR expenditure of the Company for the financial year. Further, these expenses would not include expenses incurred by the Company in terms of designing, implementation, monitoring and evaluation

B. Selection of activities:

The guiding principles for Selection of activities are:

- i. **Eligibility** - Statutory eligibility of implementing agency through which the CSR activities are selected, i.e. to ensure whether those implementing agencies have registered under section 12A and 80G of the Income Tax Act, 1961, have an established track record of at least three years in undertaking similar activities and have also filed form CSR-1 with the Registrar of Companies.
- ii. **Sustainability** - Implementing agency has a track record of 3 years in undertaking similar programs or projects.
- iii. **Law of land** – Implementing agency shall have a good stand in terms of Law of Land.

C. Implementation:

The projects and programs covered under the CSR activities of the Company may be undertaken by the Company itself or through:

- i. 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
- ii. 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
- iii. Any entity established under an Act of Parliament or a State legislature; or
- iv. 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.

Note: The term “entity” shall mean a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act.

Accordingly, such other entity will work closely with and support the Board and the CSR Committee (if applicable) in implementing CSR activities of the Company. Such other entity will assist the CSR Committee/ Board in identifying the areas of CSR activities, programs and execution of initiatives as per defined guidelines. Such other entity will also assist the Board / the CSR Committee in reporting the progress of deployed initiatives and in making appropriate disclosures (internal/external) on a periodic basis.

The surplus from the allocated CSR budget will not be utilized for business or form part of business profits.

6. DISCLOSURES

The Company will disclose its CSR policy and all other relevant disclosures required to be made as per the Act and any other applicable law on the website of the Company.

7. REVIEW & AMENDMENT OF THE POLICY

The CSR Committee / Board shall review the CSR Policy atleast once annually or when required based on the changing needs and make suitable modifications as may be necessary

In case of any amendment(s), clarification(s), circular(s), FAQs etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), FAQs etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.