STOCKIFY FINTECH PRIVATE LIMITED

Corporate Social Responsibility Policy

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1.0	22-05-2025	02-06-2025	Initial

1. INTRODUCTION

Corporate Social Responsibility (CSR) is the Company's commitment to its stakeholders to conduct business in an economically, socially and environmentally sustainable manner that is transparent and ethical.

Stockify Fintech Private Limited is committed to undertake CSR activities in accordance with the provisions of Section 135 of the Indian Companies Act, 2013 and related Rules and commits itself to contribute to the society in ways possible for the organization and has set up its committed core CSR team, as a means for fulfilling this commitment.

We believe that by supporting and creating new economic opportunities for deserving small businesswomen and men, lives can be enriched and communities can be transformed. We aim to continuously strive towards nation building by creating social and economic impact. While catering to the underserved segment of the society, we understand the responsibility of being a "corporate citizen" and hence lay down the Company's "Corporate Social Responsibility (CSR) Policy".

2. GENERAL TERMS & MEANINGS

- **Act** – means the Companies Act, 2013 as amended from time to time
- **CSR** – means Corporate Social Responsibility
- **Policy or CSR Policy** – means the policy approved by the board as the Corporate Social Responsibility policy of the company as amended from time to time.
- **CSR Rules or Rules** – means Companies (Corporate Social Responsibility Policy) Rules 2014 and includes any amendments thereon
- **Committee or CSR Committee** – Committee formed under CSR Policy to achieve objective and successful implementation of the policy.
- **Company** – Stockify Fintech Private Limited
- **Ongoing project** – Ongoing project means a multi-year project undertaken by the Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.

3. APPLICABILITY

The CSR provisions are applicable to the Company, as it meets the criteria specified under Section 135(1) of the Companies Act, 2013 (i.e., net worth of ₹500 crore or more, or turnover of ₹1,000 crore or more, or net profit of ₹5 crore or more during any financial year).

The policy shall be applicable to all CSR activities of the company whether carried by it or through any implementation agency with effect from 2nd June 2025

4. SCOPE AND OBJECTIVES

This CSR Policy is as per the requirement under the Companies Act, 2013 (hereafter referred to as "the Act"), read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 and other directions and clarifications issued from time to time (collectively referred to as the "CSR Regulations"). This policy lays down broad guidelines and principles for the Company's activities in the sphere of corporate social responsibility.

- To develop a long-term vision and strategy for Stockify Fintech Private Limited CSR objectives.
- Establish relevance of potential CSR activities to Stockify Fintech Private Limited core business and create an overview of activities to be undertaken, in line with Schedule VII of the Companies Act, 2013.
- Directly or indirectly take up programs that benefit communities at large and contribute to, over a period, enhancement in the quality of life and economic well-being of the common people.
- Creating opportunities for employees to participate in socially responsible initiatives.

5. CSR COMMITTEE

Section 135-Every company having net worth of rupees five hundred crore or more, or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during 3[the immediately preceding financial year] shall constitute a Corporate Social Responsibility Committee of the Board consisting of three or more Directors, out of which at least one director shall be an independent director.

Provided that where a company is not required to appoint an independent director under sub-section (4) of section 149, it shall have in its Corporate Social Responsibility Committee two or more Directors.

Section 135 (9) Where the amount to be spent by a company under sub-section (5) does not exceed fifty lakh rupees, the requirement under sub-section (1) for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee provided under this section shall, in such cases, be discharged by the Board of Directors of such company.

With effect from 2nd June 2025 the Board of directors as mentioned below will discharge the duties of CSR Committee as required under Section 135 of The Companies Act, 2013:

- Mr. Piyush Jhunjhunwala
- Mr. Rahul Khatuwala

6. ROLES AND RESPONSIBILITIES

i. Formulate, a CSR policy which shall indicate the activities to be undertaken by the Company as specified in the Act.
ii. Recommend the amount of expenditure to be incurred on the activities.
iii. Prepare a transparent monitoring mechanism for ensuring implementation of the projects, programs, activities proposed to be undertaken by the Company.
iv. Formulation of strategies for efficient implementation of the activities undertaken.
v. Monitor the policy from time to time.
vi. Periodic reporting of all the CSR activities undertaken.

7. ANNUAL ACTION PLAN

The Board shall formulate an action plan every financial year which shall include 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. modalities of utilisation of funds and implementation schedules for the projects or programmes.
d. monitoring and reporting mechanism for the projects or programmes.
e. details of need and impact assessment, if any, for the projects undertaken by the company. Impact assessment shall be undertaken if outlay is greater than Rs. 10 crores or such other amount as may be prescribed by the Companies Act 2013.

8. CSR ACTIVITIES

The Company shall undertake any of the following CSR activities as listed in Schedule VII and Section 135 of the Companies Act, 2013 and the Rules framed thereunder.

1. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to Swatch Bharat Kosh set-up by 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, daycare centres 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 fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air, water including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga.

5. Protection of national heritage, art and culture including restoration of buildings 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.

7. Training to promote rural sports, nationally recognised sports, para-Olympic sports and Olympic sports.

8. Contribution to the Prime Minister's National Relief 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;

9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government.

10. Rural development projects; or

11. Slum Area Development; or

12. Contribution to such other activities as notified by Ministry of Corporate Affairs.

9. ALLOCATION OF FUNDS

The Company would spend not less than 2% of the average Net Profits of the Company made during the three immediately preceding financial years. The surplus arising out of the CSR activity will not be part of business profits of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Where a company spends an amount more than requirement provided under sub-section (5) of section 135 , such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years subject to the conditions that -

(i) the excess amount available for set off shall not include the surplus arising out of the CSR activities.

(ii) the Board of the company shall pass a resolution to that effect.

(4) The CSR amount may be spent by a company for creation or acquisition of a capital asset, which shall be held by -

(a) a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and having CSR Registration Number.

(b) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or

(c) a public authority:

10. MODALITIES AND IMPLEMENTATION

The Company will undertake its CSR activities, as approved by the CSR Committee, either directly or through a registered trust or through a registered society or establish another Company under Section 8 of the Act or even collaborate with other entities.

In selecting any implementation agency, the Company shall.

- Ensure minimum three-year track record of implementation agency
- Ensure registration by the implementation agency with the Central Government by filing of Form CSR 1 by the implementation agency
- Obtain unique CSR registration number of the implementation agency.

11. CSR UNSPENT AMOUNT

The Company shall open a separate account with the name and style of "Unspent Corporate Social Responsibility Account of "Stockify Fintech Private Limited" in accordance with section 135 of the Companies Act 2013.

Unspent amount pertaining to identified ongoing projects shall be transferred to such account within 30 days of the end of every financial year. The details of balances in unspent account shall be reviewed by the CSR committee. The amount pertaining to each project in the unspent CSR account shall be spent within a period not exceeding three years.

Any unspent amount, if not relating to any ongoing projects shall be transferred to specified fund in Schedule VII of the Companies Act 2013 as per section 135(5) of the Act.

12. REPORTING

The Board in its Annual Report shall include the details of the CSR activities undertaken in the Financial Year.

The Company shall display on its website the contents of its CSR Policy and other information as may be required to be displayed. For the time being the website is under maintenance and once ready the same will be placed on the website of the Company.

13. MONITORING

The Board/ CSR Committee shall ensure effective implementation of the CSR activities undertaken by the Company. The Board shall further ensure that utilization of funds have been made for approved purposes.

14. AMENDMENT

Any or all provisions of the CSR policy shall be subject to revision/ amendment in accordance with the applicable laws/ rules/ guidelines on the subject, from time to time. The Company reserves the right to modify, cancel, add, or amend any of the above rules/ guidelines.

15. GENERAL

The Company reserves the right to modify, cancel, and add any provisions in the policy.

For Stockify Fintech Pvt. Ltd
Director
Piyush Jhunjhunwala
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Director

For Stockify Fintech Pvt. Ltd.
Director
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