

DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED

**Regd. Off.: 10th Floor, Phase -1,
IITM-Research Park, Kanagam Village, Taramani,
Chennai - 600 113**

DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED	
POLICY	CORPORATE SOCIAL RESPONSIBILITY POLICY
VERSION	1.0
DATE OF APPROVAL OF BOARD	30.01.2019
PROCESS OWNER	COMPANY SECRETARY

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INDEX

Sl.No	Particulars	Page No.
I	Preamble	3
II	Scope	3
III	Governance	3
IV	CSR Spend	3
V	Implementation	3
VI	CSR Programmes / Projects	4
VII	Monitoring & Reporting	4

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Preamble

Dvara's mission is to maximise the financial well-being of every individual and every enterprise by providing complete access to financial services in remote rural India. The Company aspires to further its social and environmental commitment by incorporating the vision of CSR laid out by the Companies Act, 2013. Dvara intends to integrate the CSR guidelines in its business operations as well as outline a strategy to invest its CSR monies in socially and environmentally beneficial outcomes.

Scope

This policy will apply to all projects/programmes undertaken as part of *the Company's* Corporate Social Responsibility and will be developed, reviewed and updated periodically with reference to relevant changes in corporate governance, international standards and sustainable and innovative practices. The policy will maintain, at all times, compliance and alignment with the activities listed in Schedule VII and Section 135 of the Companies Act 2013 and the Rules framed thereunder.

Governance

The approval of the CSR policy and oversight is the responsibility of the Company's Board of Directors. The responsibility of the CSR committee is to formulate the policy and to administer the policy through implementing partner(s) or via self-implementation. The CSR Committee shall provide guidelines for projects/partner selection to the respective CSR teams, wherever applicable. The CSR committee is to ensure that projects/programmes are compliant with regulations and are monitored and reported effectively.

As the Company's CSR activities evolve, the policy may be revised by the CSR committee and approved by the Board of Directors.

CSR Spend

The CSR Committee shall recommend to the Board the amount of expenditure to be incurred on the CSR activities to be undertaken by the company as specified in Schedule VII of the Companies Act 2013, as amended from time to time.

In case of any surplus arising out of CSR projects, the same shall not form part of business profits of the Company.

Implementation

The Company shall undertake CSR project/programmes identified by the CSR Committee in line with the CSR Policy.

The Company shall implement its CSR programmes/projects:

- a) Through an implementation partner that can be a public charitable trust or a society

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registered under applicable Acts or a Company registered under Section 8 of the Companies Act 2013; or

- b) On its own, through the relevant HR or CSR department: or
- c) through its own foundation (if applicable) specifically created for implementing its CSR initiatives.

The Company may enter into partnerships or alliances with NGOs, Trusts, or other Corporate Foundations etc. to effectively implement its CSR programmes/projects.

The Company can also implement programme in collaboration with other company(ies), if permissible and feasible.

The Company shall formulate criteria and procedure for selection, screening and due diligence of its implementing partners.

CSR Programmes / Projects

The Company would be adopting a focused and a structured approach towards implementing its CSR initiatives. It has identified broad programme areas with focus on quality service delivery and empowerment.

The programme areas are:

- Providing basic health care facilities to economically backward societies across geographical areas,
- Improving access to education,
- Provision of Skill Development/Vocational Training,
- Rural Development,
- Environmental sustainability,
- Promoting Sports, arts & culture,
- Sustainable livelihood
- Such other activities as may be prescribed in Companies Act, 2013

Monitoring and Reporting

The CSR Committee will oversee the implementation and monitoring of all CSR projects/programmes and periodic reports shall be provided for review to the Board.

The Company will institute a well-defined, transparent monitoring and review mechanism to ensure that each CSR project/programme has:

1. Clear objectives developed out of the societal needs that may be determined through need assessment studies and research (secondary or primary);
2. Clear targets, time lines and measurable indicators, wherever possible;
3. A progress monitoring and reporting framework that is aligned with the requirements of Section 135 of the Companies Act 2013 and the CSR Rules.

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