DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED

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DVARA KSHETRIYA GRAMIN FINANCIAL SERVICES PRIVATE LIMITED	
POLICY	CORPORATE SOCIAL RESPONSIBILITY POLICY
VERSION	3.0
DATE OF APPROVAL OF BOARD	January 30, 2019
DATE OF LAST REVIEW	February 14, 2025
POLICY OWNER	SECRETARIAL

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VERSION

Version	Date of Approval
Version 1.0	January 30, 2019
Version 2.0	February 08, 2023
Version 3.0	February 14, 2024
Version 3.0 (Annual Review)	February 14, 2025

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 Section 135, and rules made thereunder along with 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 the business profits of the Company.

In case the Company spends an amount in excess of the requirements provided under The Act, it may set off such excess amount against the requirement to spend for such number of succeeding financial years and in such manner, as may be prescribed.

Any amount remaining unspent under 135(5) of the Act, pursuant to any ongoing project, fulfilling such conditions as may be prescribed, undertaken by the Company in pursuance of its CSR Policy, shall be transferred by the Company within a period of thirty days from the end of the financial year to a special account to be opened by the Company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the Company in pursuance of its obligation towards the CSR Policy 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.

If the unspent amount does not relate to any ongoing project referred as above, the Company shall transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Implementation

The Company shall undertake CSR projects/programmes identified by the CSR Committee and approved by the Board of Directors in line with the CSR Policy.

The Company shall implement its CSR programmes/projects

a) 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.

Explanation.- For the purpose of clause (iii), 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.

Every entity, covered under sub-rule (a), who intends to undertake any CSR activity, shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar, with effect from the 01st day of April 2021

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

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

CSR Programmes / Projects

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

The programme areas are:

- Providing basic healthcare 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, timelines 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.

Review of Policy

The Policy shall be reviewed at least once in a year or as and when required.