



Pocketly Infotech Private Limited

CIN: U72900MH2019PTC333380

Website: www.pocketly.in

Email: help@pocketly.in

Reg Off: 125FF, Zal Complex, Sadar, Nagpur - 440001

CORPORATE SOCIAL RESPONSIBILITY POLICY

[Pursuant to clause (o) of sub-section (3) of section 134 of the Companies Act, 2013 and Rule 9 of the Companies (Corporate Social Responsibility) Rules, 2014]

Version no.	CSRP/1.0/2021-2022
Original date of adoption of Policy	Dec 14, 2022
Last Amendment/ Modification date	Dec 14, 2022
Policy Owner	Pocketly Infotech Private Limited
Approved by	Board of Directors

I. Introduction

This policy has been instituted based on the Corporate Social Responsibility (CSR) philosophy of Pocketly Infotech Private Limited (Pocketly) and provisions of Section 135 of the Companies Act, 2013, read with Schedule VII of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014.

This policy will at all times be subject to the provisions of the aforesaid act and rules (as amended from time to time). This Policy will come into force with immediate effect.

II. Preamble

Pocketly Infotech Private Limited is a leading fintech company which facilitates digital loans in India via its digital lending application called 'Pocketly' by partnering with RBI registered NBFCs.

The main objective of CSR policy of Pocketly is to lay down guidelines to make CSR a key business process for sustainable development of the Society. It aims at supplementing the role of the Govt. in enhancing welfare measures of the society based on the immediate and long term social and environmental consequences of their activities

III. Vision

The CSR mission to contribute to the social and economic development of the community through a series of contributions the company seeks to provide support to economically, physically and socially changed groups and to push them into the cycle of growth, development and empowerment.

IV. Policy Objective and Philosophy

The Company intends to be a significant contributor to CSR initiatives in India by devising and implementing social improvement projects for the benefit of underprivileged communities, towns and villages.

V. Definitions

“Board of Director” or **“Board”** means the Board of Directors of the Company, as constituted from _____ time _____ to _____ time.

“Company” means a company incorporated under the Companies Act, 2013 or under any previous _____ company _____ law.

“CSR Programmes” means Programmes, projects and activities carried out in this regard are the subject matter of this Policy.

“Corporate Social Responsibility Committee or Committee” means CSR Committee constituted by the Board of Directors of the Company, from time to time.

“Policy” means Corporate Social Responsibility.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013 or any other applicable regulation.

VI. Composition of the CSR Committee

Name	Designation
Mr. Aarav Singh Bhatia	Director – Member
Mr. Navdeesh Ahuja	Director – Member

- The CSR Committee of the Company shall be responsible for: a. Formulating and recommending to the Board the CSR Policy which shall indicate activities to be undertaken in line with Section 135 read with Schedule VII of the Act.
- Recommending to the Board the CSR expenditure to be incurred.
- Monitor the implementation of the CSR Policy from time to time

VII. Policy

- To direct CSR Programmes, inter alia, towards achieving one or more of the following – enhancing environmental and natural capital; supporting rural development; promoting education including skill development; providing preventive healthcare, providing sanitation and drinking water; creating livelihoods for people, especially those from disadvantaged sections of society, in rural and urban India and preserving and promoting sports.
- To develop the required capability and self-reliance of beneficiaries at the grass roots, in the belief that these are prerequisites for social and economic development;

- To engage in affirmative action/interventions such as skill building and vocational training, to enhance employability and generate livelihoods for persons including from disadvantaged sections of society;
- To pursue CSR Programmes primarily in areas that fall within the economic vicinity of the Company's operations to enable close supervision and ensure maximum development impact;
- To carry out CSR Programmes in relevant local areas to fulfil commitments arising from requests by government/regulatory authorities and to earmark amounts of monies and to spend such monies through such administrative bodies of the government and/or directly by way of developmental works in the local areas around which the Company operates;
- To contribute to the Prime Minister' National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Caste, the Scheduled Tribes, other backward classes, minorities and women;
- To contribute or provide funds to technology incubators located within academic institutions which are approved by the Central Government;
- To contribute to any fund setup by the Central Government or State Government(s) including Chief Minister's Relief Fund, which may be recognized as CSR activity;
- To promote sustainability in partnership with industry associations, like the Confederation of Indian Industry (CII), PHD, FICCI, etc. in order to have a multiplier impact.
- Such other matters as may be prescribed

VIII. Responsibility of the Board Of Directors

The board shall be responsible for-

- Approving the CSR Policy of the company as may be recommended by the CSR Committee, subject to necessary changes/modifications as the board may deem fit.
- Ensuring that in each financial year the company spends such amount for CSR activities as may be stipulated in the Act, as amended from time to time (presently 2% of the average net profits of the company made during the last three preceding financial year)
- Ensuring that the activities included in the CSR Policy are undertaken by the company.

IX. Governance

The CSR Committee will review periodically and keep the Board apprised of the status of the progress of implementation of the approved CSR Programmes and ensure that a transparent monitoring mechanism is put in place.

Finally at the end of every financial year, the CSR Committee will submit its report to the Board.

X. Budget

The overall amounts to be committed to CSR spent by the Company shall be as stipulated under the Act, as amended from time to time (presently 2% of the average net profits of the Company for the preceding three financial years) and as approved by the Board.

Any surplus arising out of the CSR projects or programs or activities shall not form part of business profits of the Company

XI. CSR Expenditure

CSR expenditure will include all expenditure as may be permitted under the applicable laws, including contribution to corpus for CSR Programmes approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act.

XII. Monitoring

The CSR Committee will ensure a transparent monitoring mechanism for ensuring effective implementation of the projects/programme/activities proposed to be undertaken by the company.

The CSR Committee would have the responsibility of monitoring approved projects and fund disbursements for such projects. Monitoring mechanism will include visits, meetings and progress status reporting by the project team. The CSR activities will be reviewed by the CSR Committee.

A system will be put in place to maintain a transparent monitoring and reporting mechanism across all the stakeholders involved in the CSR activities of the company, as desired by the CSR rules (Section 135, The Companies Act, 2013).

XIII. Reporting

Significant CSR activities and achievements will be reported as a part of Board's Report in the Company's Annual Report and also as per any other statutory and regulatory requirements

XIV. Areas of CSR

- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to Swachh Bharat Kosh set up by Central Government for the promotion of sanitation and making available safe drinking water.
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
- 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.

- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water;
- 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;
- Measures for the benefit of armed forces veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- Contribution to the Prime Ministers' 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;
- Contributions or funds provided to technology incubators located within academic institution which are approved by the Central Government;
- Rural development projects/slum area development.
- And other activities, as may be recommended by the Ministry of Corporate affairs from time to time.