VERITAS FINANCE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

REVISION HISTORY

Version No.	Date	Revision details
1.	July 18, 2018	The CSR Committee, at its meeting held on June 25, 2018, recommended the CSR Policy to the Board of Directors of the Company. The Board of Directors approved the CSR Policy at its meeting held on July 18, 2018.
2.	July 24, 2019	The policy has been amended for Inclusion of Disaster Management - including relief, rehabilitation and reconstruction activities, under CSR activities.
3.	June 15, 2020	The policy has been amended for Inclusion of 'Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)', as an eligible CSR expenditure under item no (viii) of Schedule VII of the Companies Act, 2013 with effect from 28th March 2020.
4.	August 05, 2021	The policy has been amended for Inclusion of the following amendments as prescribed by The Ministry of Corporate Affairs, vide its notification dated January 22, 2021 amended the Companies (Corporate Social Responsibility Policy) Rules, 2014
5.	September 06, 2024	The policy has been amended for inclusion of strategy for implementation of CSR activities, impact assessment of the projects undertaken, details of CSR Assets and unspent amount and display of CSR projects approved by the Board on the website of the Company.
6.	October 29, 2025	Pursuant to the Companies (Corporate Social Responsibility Policy) Rules, 2014, and based on the recommendations of the CSR Committee at its meeting held on October 17, 2025, the CSR Policy is placed before the Board for its annual review.
7.	October 29, 2026	As part of the annual review, the Policy has been amended in accordance with Section 135 of the Companies Act, 2013, and the Companies (Corporate Social Responsibility Policy) Rules, 2014, to incorporate additional definitions, specify the composition of the CSR Committee, and clarify the effective date of the Policy, to enhance the clarity and ease of understanding of the Policy, without altering its substantive provisions

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1. Preamble:

We at Veritas Finance Private Limited ("Veritas Finance") recognize that integrating social, environmental and ethical responsibilities into the governance of businesses ensures the long-term success, competitiveness and sustainability.

Further, Corporate Social Responsibility ("CSR") makes a business sense as companies with effective CSR, have image of socially responsible companies, achieve sustainable growth in their operations in the long run and their products and services are preferred by the customers.

2. Definition & Objective:

The clause (f) of Rule (2) of the Companies (Corporate Social Responsibility Policy) Rules, 2014 defines "CSR Policy" as a statement containing the approach and direction given by the Board of a Company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation, and monitoring of activities as well as formulation of the annual action plan.

The main objective of CSR Policy is to make CSR a key business process for sustainable development of the society. Veritas Finance will act as a good corporate citizen and aim at supplementing the role of Government in enhancing the welfare measures of the society within the framework of its policy.

"Board" shall mean board of directors of Veritas Finance Limited;
"**Companies Act**" shall mean the Companies Act, 2013 and shall include any modifications, amendments or re-enactment thereof;
"**Company**" shall mean **Veritas Finance Limited**, wherever it is referred to in this Policy;
"**Corporate Social Responsibility Committee**" or "**CSR Committee**" or "**Committee**" shall mean a Committee of the Board constituted under provisions of SEBI Listing Regulations and Companies Act read with rules thereto constituted for the purpose of undertaking CSR Projects (*defined below*) in accordance with applicable laws;
"**CSR Projects**" or "**Projects**" shall mean Corporate Social Responsibility projects/ activities/programs/ initiatives, instituted in India, either new or ongoing projects, and includes, but is not limited to those undertaken by the Board in pursuance of recommendations of the CSR Committee as per the declared CSR Policy of the Company;
"**Regulations**" shall mean Section 135 of the Companies Act, read with Schedule VII of the Companies Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014, each as amended from time to time and the notifications and circulars issued by the Ministry of Corporate Affairs from time to time and the rules framed thereunder;
"**Policy**" or "**CSR Policy**" shall mean the Policy on Corporate Social Responsibility of the Company framed

under the Companies Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 and shall include any amendments made thereto;

3. Measures and guiding principles for selection:

The CSR activities shall be undertaken by Veritas Finance as stated in this Policy, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business.

The following activities shall not form part of the CSR activities of the Company:

- Any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level
- Contribution of any amount directly or indirectly to any political party under section 182 of the Act
- Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services
- Activities carried out for fulfilment of any other statutory obligations under any law in force in India
- CSR activities which are exclusively for the benefit of Veritas Finance employees or their family members shall not be considered as CSR activity.

The company shall give preference to the local area or areas around it where it operates, for spending the amount earmarked for CSR activities.

4.List of CSR Projects:

The following is the list of CSR projects or programs which Veritas Finance plans to undertake pursuant to Schedule VII of the Companies Act, 2013:

i. **HUNGER, POVERTY, MALNUTRITION AND HEALTH:** eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the 'Swachh Bharat Kosh' set-up by the Central Government for the promotion of sanitation and making available safe drinking water;

ii. **HUNGER, POVERTY, MALNUTRITION AND HEALTH:** eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the 'Swachh Bharat Kosh' set-up by the Central Government for the promotion of sanitation and making available safe drinking water;

iii. **EDUCATION:** promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;

iv. **GENDER EQUALITY AND EMPOWERMENT OF WOMEN:** 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;

v. **ENVIRONMENTAL SUSTAINABILITY:** 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;

vi. **DISASTER MANAGEMENT:** including relief, rehabilitation and reconstruction activities.

vii. **CONTRIBUTION TO FUNDS:** Contribution to the prime minister's national relief fund or any Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)' fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women.

viii. **OTHERS:** Any other CSR contributions with the approval of Board of Directors on the recommendation of CSR Committee subject to the provisions of Section 135 of Companies Act, 2013, rules made there-under, and Schedule VII of the Companies Act, 2013.

5.Monitoring:

a. Corporate Social Responsibility Committee:

The company has constituted a CSR committee of the Board of Directors to oversee the implementation of the CSR policy of the company in accordance with the requirements of Section 135 of the Companies Act. The CSR Committee shall provide guidelines for projects/partner selection and ensure that the projects/programmes are compliant with regulations and are monitored and reported effectively.

b. Terms of Reference of Corporate Social Responsibility Committee

1. To formulate and recommend to the Board, a CSR policy which shall indicate the activities to be undertaken by the Company as per the Schedule VII of Companies Act, 2013 as may be amended or modified from time to time.

2. To review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the company;

3. To monitor the CSR policy of the Company from time to time;

4. To formulate and recommend to the Board, an annual action plan;

5. To review the CSR project/initiatives from time to time

6. Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors from time to time.

6.Budget:

A specific budget is allocated for CSR activities and spending on CSR activities shall not be less than 2% of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this policy.

In case Company fails to spend such amount, the Board shall specify the reasons for not spending the amount.

The total budget for the CSR projects will be decided by the CSR Committee. The CSR projects or programs or activities undertaken in India only shall amount to CSR expenditure. The Company may spend up to 5% of the total CSR expenditure in one financial year on building CSR capabilities and other general and administrative overheads.

Unspent CSR amount: Any amount remaining unspent pursuant to any ongoing project shall be transferred within a period of 30 days from the end of the financial year to a special account called the 'Unspent Corporate Social Responsibility Account', and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of 3 financial years from the date of such transfer, failing which the amount remaining unspent at the end of the 3 financial years in 'Unspent Corporate Social Responsibility Account' shall be transferred to a Fund specified in Schedule VII, within a period of 30 days from the date of completion of the third financial year.

Unspent CSR amount other than the amounts related to ongoing projects, shall be transferred to a Fund specified in Schedule VII within a period of 6 months of the expiry of the financial year.

***Explanation**: Ongoing Project means a multi-year project undertaken by a 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.*

Surplus arising out of CSR amount spent: Any surplus arising out of CSR activities shall not form part of business profits of the Company. The Surplus amount shall be ploughed back into the same project or shall be transferred to the Unspent Corporate Social Responsibility Account and spent pursuance to this policy and annual action plan (or)transfer such surplus amount to the Fund specified in Schedule VII of the Companies Act 2013 within six months of the expiry of the financial year.

Excess CSR amount spent: In case the Company spends an amount in excess of the requirement under Section 135 of the Companies Act, 2013, such excess amount may be set off against the future CSR Spend up to immediate succeeding three financial years subject to the conditions prescribed under the Rules.

Capital assets: The Company may spend CSR amount for creation and acquisition of capital assets 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 CSR Registration Number under sub-rule (2) of rule 4; or (b) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or (c) a public authority.

7.Strategy for implementation of CSR Activities:

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

The Company may meet its CSR obligations by focussing its activities either on its own or through Veritas Foundation or a third party or a registered trust or a Society or a Company, established by the Company itself or its holding Company or any other Associate Company under Section 8 of the Companies Act with established track record of 3 years in undertaking similar programs or projects.

The Company may also collaborate with other Companies, Trust, Societies for undertaking projects or programs or CSR activities in such a manner that the CSR Committees of the respective Companies are in a position to report separately on such projects or programs in accordance with the mechanism approved by the CSR Committee.

Subject to the approval of CSR Committee of the Board, the company may engage international organisations for designing, monitoring and evaluation of the CSR projects or programmes as well as for capacity building of their own personnel for CSR. The Company shall formulate criteria and procedure for selection, screening and due diligence of its implementing partners. In case of ongoing projects, the CSR Committee shall also monitor the implementation with reference to the approved timelines and year-wise allocation. The CSR Committee is empowered to make modifications for implementation of on-going projects.

8. Annual Action Plan

The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely:-

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 as specified in sub-rule (1) of rule 4;
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.

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

9. Impact Assessment

Impact Assessment shall be done as decided by CSR Committee or Board. If the average CSR obligation is ten crore rupees or more in the three immediately preceding financial years, the Company shall undertake an impact assessment through an independent agency, of the projects having outlay of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study. In addition to the above, additional projects may be selected at the option of the Company for impact assessment and/or mid-term assessment. These will be reviewed at CSR Committee and summary of the outcomes shall be placed before the Board. The report of such assessment shall be placed before the Board and shall also be annexed to the Annual Report on CSR.

The Company shall spend up to 5% of the total CSR expenditure in one financial year or 50 lakh rupees, whichever is higher, on undertaking impact assessment for the applicable projects, as required by the law.

10. Display in Website:

The Board of Directors of the company shall, after taking into account the recommendations of CSR Committee, approve the CSR Policy for the company and disclose contents of such policy in its report and the same shall be displayed on the company's website, as per the particulars specified in the Annexure of "Companies (Corporate Social Responsibility Policy) Rules, 2014" along with the composition of the CSR Committee, and Projects approved by the Board.

11. Management Commitment:

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

12. **Composition:**

The CSR Committee shall consist of 3 or more directors, out of which at least one director must be an independent director. The Board may change the composition of the CSR Committee from time to time in such manner as it thinks fit and as required under the CSR Regulations.

13. Reporting:

The CSR Committee shall prepare an annual report on CSR with such information and particulars as may be required by the Act and such report shall be included in the Board's report annexed to the financial statements.

The Board's report shall include an annual report on CSR containing such details as may be prescribed from time to time under the Act and the CSR Rules.

The Board will be responsible to ensure that the statutory requirements as may be prescribed from time to time under the Act and the CSR Rules are complied with.

14. Update:

CSR Committee of Board of Veritas Finance will review the policy from time to time based on the changing needs and aspirations can make suitable modifications as may be necessary with due permission of the Board.

15. Effective Date: The Policy shall be effective from the date of approval of the Board.