

CORPORATE SOCIAL RESPONSIBILITY POLICY

{Pursuant to Section 135 of Companies Act, 2013}

SUSHIL FINANCIAL SERVICES PRIVATE LIMITED
Regd. Office: - 12, HOMJI STREET, FORT, MUMBAI-400 001



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INTRODUCTION

Corporate Social Responsibility (CSR) is strongly connected with the principles of Sustainability; an organization should make decisions based not only on financial factors, but also on the social and environmental consequences. Therefore, it is the core corporate responsibility of Sushil Financial Services Private Limited ("SFSPL" or "the Company") to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

SHORT TITLE AND APPLICABILITY

This Policy shall be called the **Corporate Social Responsibility (CSR) Policy of Sushil Financial Services Private Limited** ("the Company").

This Policy shall apply to the Company if it meets any of the following criteria during the immediately preceding financial year:

- Net worth of ₹500 crore or more; or
- Turnover of ₹1000 crore or more; or
- Net profit of ₹5 crore or more.

This Policy shall apply to all CSR initiatives and activities undertaken by the Company in India.

OBJECTIVES :

The objective of this policy is to:

- 1) Define the governance structure for CSR.
- 2) Laydown the guidelines for the Company to undertake socially useful programs for the welfare and sustainable development of the community at large.
- 3) Ensure compliance with statutory provisions.
- 4) Specify the modalities of execution, implementation, monitoring, and reporting of CSR activities.

PHILOSOPHY:

The Company is committed to conducting its business in a socially responsible, ethical, and environmentally sustainable manner. CSR activities shall focus on inclusive growth, sustainable development, and contributing positively to society.



REGULATORY FRAMEWORK:

This Policy is framed in accordance with the provisions of Section 135 of the Companies Act, 2013 ("the Act") and the Companies (CSR Policy) Rules, 2014, including any statutory modifications or amendments thereof and Schedule VII of the Act provides a framework for the Companies to define the key thrust areas in the CSR space. This Policy also reiterates the Company's commitment to follow the nine principles laid down in the National Voluntary Guidelines on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs while conducting its business to the extent these are relevant.

DEFINITIONS:

"Corporate Social Responsibility (CSR)" means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in these rules, **but shall not include the following, namely:-**

- (i) Activities undertaken in pursuance of normal course of business of the company;
- (ii) 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;
- (iii) contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- (iv) activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
- (v) activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- (vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India;

"CSR Policy" is the board's statement outlining the approach, guiding principles for activity selection, implementation, monitoring, and the annual action plan.

"Average Net Profit" means the average of the net profits of the Company made during the three immediately preceding financial years, calculated in accordance with the provisions of Section 198 of the Companies Act, 2013, and as referred to under Section 135 of the Act for the purpose of computing CSR expenditure.

"Administrative Overheads" means the expenses incurred by the Company for general management and administration of Corporate Social Responsibility (CSR) functions in the

Company, but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular CSR project or programme.

“Surplus” means any income, revenue, profit, or excess amount arising out of Corporate Social Responsibility (CSR) activities or projects undertaken by the Company.

SELECTION FOR CSR PROGRAMMES:

With the advent of the Companies Act 2013 particularly Section 135 of the Act, SFSPL shall undertake any of the following activities under its CSR programme:

- (i) eradicating hunger, poverty and malnutrition, promoting health care including preventive health 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) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- (iv) 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;
- (v) 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;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents, [Central Armed Police Forces (CAPE) and Central Para Military Forces (CPMF) veterans, and their dependents including widows];
- (vii) training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- (viii) contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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;
- (ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and



- (b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- (x) rural development projects.
- (xi) slum area development. Explanation.— For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.
- (xii) disaster management, including relief, rehabilitation and reconstruction activities.

IMPLEMENTATION:

SFSPL CSR Programs shall be implemented through any of the following medium:

A) Through Company's own brand name:

While brands are one of core resources for sustainable profit growth, SFSPL believes that these brands, given their consumer connect, credibility and their trust in brands core values, are well positioned to perform a distinct role in spread heading SFSPL's CSR cause. SFSPL would lead some of its CSR programme through its brands to spread awareness, credibility and quick adaptation. These will be designed to make Company's CSR to spend more effective in achieving its goals and reputational benefit which may occur to the Brand will be purely coincidental.

OR

B) Through any other—entity/company/trust/society specified under the rules of Companies Act, 2013 as amended from time to time.

GOVERNANCE:

The Board will have an oversight on the adherence of this policy. The Corporate Social Responsibility Committee ("CSR Committee") of the Board shall comprise of minimum two Directors of the Company. The CSR committee shall work under superintendence and control of the Board. The activities are disclosed in the Board Report and on the website.



A) The CSR Committee shall be headed by the Chairman of Board and shall be responsible to:

1. Formulate and approve revisions to the CSR Policy and recommend the same to Board for its approval.
2. Recommend the annual CSR expenditure budget to the Board for approval.
3. Monitor the implementation of CSR projects/Programs.
4. Monitor the CSR Policy of the Company from time to time.
5. Treat the unspent CSR Amount as per the provisions of Companies Act, 2013 and rules made there under from time to time.
6. Set off the excess CSR amount spent against the requirement to spend under section 135(5) of the Companies Act, 2013.
7. Such other activities as may be specified under Companies Act, 2013 and rules made there under from time to time.

B) Annual Action Plan:

Pursuant to Companies (Corporate Social Responsibility Policy) Rules, 2014, CSR Committee to formulate Annual Action Plan by including the following:

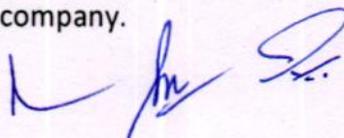
- a) List of approved CSR projects.
- b) Manner of execution of CSR projects.
- c) Implementation schedules and modalities for fund utilisation.
- d) Monitoring & reporting mechanism.
- e) Details of need and impact assessment, if any

INFORMATION DISSEMINATION:

The Company's engagement in this domain is disseminated in the Report and on the website of the Company. The Company shall disclose the composition of CSR Committee and projects approved by the Board on their website.

EXPENDITURE

- a) The Board of SFSPL to ensure that minimum of 2% of average net profit of the last 3 years is spent on CSR initiatives undertaken by SFSPL.
- b) The Board of SFSPL to ensure that the administrative overheads w.r.t. CSR activities shall not exceed **five percent** of total CSR expenditure of the company for the financial year.
- c) The overall amount to be committed towards CSR will be approved by the Board of Directors as a part of annual Budget /Plans.
- d) Within the Budget the allocation towards specific CSR initiatives/projects will be approved /ratified by the CSR committee.
- e) The surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of a company.



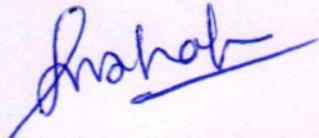
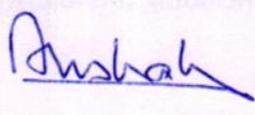
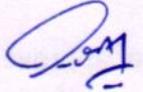
- f) The budget shall be guided by amendments brought in Companies Act 2013 and rules made there under from time to time.

REVIEW & AMENDMENTS:

The Board may on recommendation of CSR committee, subject to applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.

Version-1 of 2026
Version-Approved by the Board of Directors
Version approved on : March 18, 2026
Recommended By: CSR Committee
Next Review: As and when required

Approved and Signed By:

		
Sushil Narendra Shah Managing Director	Ajay Narendra Shah Director	Viral Piyushkant Parikh Whole- time Director

