

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

MONEYVIEW LIMITED

(Formerly known as Moneyview Private Limited and Whizdm Innovations Private Limited)

Approved by	Board of Directors
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Policy owner department	Compliance
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CONTEXT

Moneyview Limited¹ (“**Moneyview**” / “**Company**”) is committed to grow in a socially and environmentally responsible manner. Serving the needy people is the top priority of Moneyview. Moneyview Corporate Social Responsibility initiative aims at having a long-term sustainable impact on the community.

Moneyview has formulated this policy in compliance with Section 135 read along with Schedule VII of the Companies Act, 2013 (“**Act**”) and Companies (Corporate Social Responsibility) Rules, 2014 (“**CSR Rules**”) including any amendment from therein from time to time. In the event that the relevant provisions of the Act or the CSR Rules are amended from time to time, this Policy shall be deemed to have incorporated such amendments with effect from the date on which such amendments come into force.

This CSR Policy (the “**Policy**”) shall apply to all CSR projects/initiatives and activities undertaken by Moneyview in India as per Schedule VII of the Act read with CSR Rules.

OBJECTIVES

Moneyview endeavors to reach out to underprivileged and economically weaker communities including persons with disability to address key challenges in these societies. Moneyview shall aim at undertaking/participating in CSR activities aimed at contributing towards education, vocational skills, financial literacy, poverty alleviation, water conservation, sports, disability & livelihood, wildlife conservation, environmental sustainability, healthcare and other social welfare activities & initiatives and shall ensure that its activities extend beyond its business and include initiatives and endeavors for the benefit and development of the community and society at large.

The CSR initiatives shall, however, not directly relate to (i) the business of the Company and (ii) welfare of its employees and their families.

Moneyview shall focus on undertaking/contributing to CSR activities that are permitted as per Section 135 and Schedule VII of Companies Act 2013.

DEFINITIONS

- “Board” means board of directors of the Company.
- “Corporate Social Responsibility” or “CSR” means and includes but is not limited to projects or programs relating to activities specified in Schedule VII to the Act.
- “CSR Committee/Committee” means the Corporate Social Responsibility Committee of the Board referred to in Section 135 of the Act.
- “CSR Policy” relates to the activities to be undertaken by the Company as specified in Schedule VII to the Act and the expenditure thereon.
- “Ongoing Project” means a multi-year project undertaken by the Company in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced and shall include the 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.

¹ (Formerly known as Moneyview Private Limited and Whizdm Innovations Private Limited).

GOVERNANCE

The CSR Committee of the Board of Moneyview shall be responsible for the governance and review of the CSR activities. The CSR Committee shall, inter alia, recommend annual objectives, budget and general framework in respect of the CSR activities of the Moneyview to the Board for its approval.

The Committee will meet as frequently as desired and shall meet at least once a year.

CSR COMMITTEE

At Moneyview, the CSR governance structure will be headed by the CSR Committee which will be ultimately responsible for overseeing all the CSR activities of the Company and will make necessary recommendation to the Board.

The CSR Committee shall –

- Formulate and recommend to the Board, a “Corporate Social Responsibility Policy” which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Act, monitor the implementation of the same from time to time, and make any revisions therein as and when decided by the Board;
- Review and recommend to the Board the amount of expenditure to be incurred on the activities referred to above;
- Instituting a transparent monitoring mechanism for implementation of the corporate social responsibility projects or programs or activities undertaken by the Company;
- Identifying corporate social responsibility policy partners and corporate social responsibility policy programmes;
- Monitor the corporate social responsibility policy of the Company and its implementation from time to time;
- formulate and recommend to the Board, an annual action plan (beginning of the financial year) in pursuance of CSR policy;
- Monitoring, approval and review of ESG framework; and
- Any other matter as the CSR Committee may deem appropriate after approval of the Board or as may be directed by the Board from time to time and/or as may be required under applicable law, as and when amended from time to time

ANNUAL ACTION PLAN

The CSR Committee shall formulate an annual action plan in pursuance of this CSR Policy, which shall include the following and recommend it to the Board for approval:

- the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- the manner of execution of such such projects or programmes.
- the modalities relating to utilisation of funds and implementation schedules for the projects or programmes.
- monitoring and reporting mechanism for the projects or programmes; and
- details of the need and impact assessment, if applicable, for the projects undertaken by the Company.

The Board as per recommendation of CSR Committee may approve and/or alter the annual action plan, at any time, during the financial year, based on the reasonable justification to that effect.

CSR Committee can nominate any officer of the Company as Nodal Officer for CSR activities and all connected matters relating to CSR compliances. Project proposal for any CSR activity shall be examined by the Nodal Officer (as designated from time to time) and the proposal shall be submitted for recommendations to the CSR committee. The Company Secretary of the Company shall act as Nodal Officer for CSR activities.

SELECTION/IDENTIFICATION OF CSR PROJECTS/PROGRAM:

- The Company shall ensure that in identifying its CSR Projects, preference shall be given to the local area and areas around which the Company (including its Units) operates. However, this shall not bar the Company from pursuing its CSR objects in other areas.
- The CSR Projects/program identified by the Company shall fulfill the criteria as prescribed in Section 135 of the Act and rules made there under and this Policy. Every year, the CSR Budget, along with its implementation schedule shall be presented to the Board, by the CSR Committee, for its approval.
- The Members of the CSR Committee of the Company and/or Nodal Officer are authorized severally to decide the Projects to be implemented as recommended by the CSR Committee and approved by the Board.
- The CSR Committee may engage external professionals /firms /agencies (“**Specialized Agencies**”), if required, for the purpose of identification and implementation of CSR initiatives.

BUDGETS AND EXPENDITURES:

The Board shall endeavor that in every financial year, at least 2% of average net profits from the immediately 3 (three) preceding financial years is spent on CSR initiatives undertaken by the Company. The overall amount to be committed to CSR will be approved by the Board as recommended by the CSR committee through its annual action plan carrying list of CSR projects or programs approved to be taken. The following guiding principles to be adhered to in terms of CSR expenditure:

- (i) The administrative overheads shall not exceed 5% of the total CSR expenditure of Company for the financial year.
- (ii) Any surplus generated from CSR activities shall not form part of the business profit of Company and shall be treated as follows:
 - Plough back into the same project;
 - Transfer to a designated unspent CSR account and spent in pursuance of CSR policy and annual action plan of Company; or
 - Transfer to a fund specified in Schedule VII, within the prescribed timeline as specified in the CSR Rules

Any unspent amount shall be reported by the Board in its report specifying the reasons for not spending the amount and shall be dealt with in accordance with Section 135 of the Act and rules made thereunder.

In case, the Company spends an amount in excess of requirement of its CSR obligations in a financial year, such excess amount may be set off against the requirement of CSR spending up to immediate succeeding three financial years subject to fulfilment of conditions specified under the CSR Rules (as amended).

Subject to the approval of the Board, the CSR amount may be spent by the Company for any projects or activities under this Policy through-

- a company established under section 8 of the Act, or a registered public trust or 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 section 80 G of the Income Tax Act, 1961 (43 of 1961), established by Moneyview, either singly or along with any other company;
- beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
- 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;
- 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 section 80 G of the Income Tax Act, 1961 (43 of 1961), and having an established track record of at least three years in undertaking similar activities;

- any entity established under an Act of Parliament or a State legislature; or
- Further the Company may also collaborate with other companies/organizations to undertake it's CSR projects/programs/ activities.

IMPLEMENTATION PROCESS

- Moneyview CSR projects and programs will be undertaken based on CSR Policy as recommended by the Committee.
- Moneyview CSR programs may be implemented through specialized agencies, provided such specialized agencies are eligible for carrying out the CSR project. The Company will select its partners after appropriate due diligence.
- The disbursement by the Company to the specialized agencies shall be made only upon receipt of proposal along with budget and implementation schedule.
- The specialized agencies shall keep the Nodal Officer informed of any information or circumstances that may affect the ability of the specialized agency to carry out the CSR project or program, and the Nodal Officer shall, in turn, apprise the CSR Committee and the Board of the same.
- In case of ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- The Company shall carry out impact assessment if the average CSR obligation is of INR 10,00,00,000 (Indian Rupees Ten Crore) or more in the three immediately preceding financial years.
- The Company may treat the expenditure incurred on impact assessment as part of its Corporate Social Responsibility expenditure for the relevant financial year, provided that such expenditure shall not exceed 2% of the total CSR expenditure for that financial year or INR 50,00,000 (Indian Rupees Fifty Lakh), whichever is higher impact assessment report prepared pursuant to this paragraph shall be placed before the Board and shall be annexed to the annual report on CSR.

MONITORING & REPORTING

Monitoring

Monitoring will include one or more of following which shall be implemented based on the size, quantum, and tenure of the CSR programmes:

- Obtaining feedback from beneficiaries.
- Conducting field visits by an authorized person. The visits may be on an informed or surprise basis.
- Receiving feedback/updates from specialized agencies on a quarterly/annual basis in the format mutually decided.
- Auditing the CSR programmes as and when required.
- Such other monitoring mechanisms and oversight as may be determined by the Board or CSR Committee in such manner and with such periodicity as may be required under the Act, the CSR Rules and any other applicable laws or regulations.

Reporting:

- The Board's Reports shall also include an annual report on CSR containing particulars as specified in the format prescribed in CSR rules.
- The CSR Policy, annual action plan and Projects approved by the Board shall be disclosed, if required, on the website of the Company as per CSR Rules.

- The Board will ensure that the statutory requirements as may be prescribed from time to time under the Companies Act, 2013, as amended and the CSR Rules are complied with.

AMENDMENTS TO THE POLICY

The Company reserves its right to amend or modify this CSR Policy in whole or in part, at any time without assigning any reason whatsoever. Unless otherwise specified such amendments shall be effective from the date of the meeting of the Board at which such amendments are approved.

In the event of any conflict between the provisions of this CSR Policy and of the applicable law(s) dealing with the corporate social responsibility, such applicable law(s) as may be in force from time to time shall prevail over this CSR Policy.