



CORPORATE SOCIAL RESPONSIBILITY POLICY

[Pursuant to section 135(3)(a) of the Companies Act, 2013 read with Companies (Corporate Social Responsibility) Rules, 2014]

Version no.	CSRP/2.0/2025-2026
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Last Amendment/ Modification date	February 13, 2026
Policy Owner	Speel Finance Company Private Limited
Approved by	Board of Directors

I. Introduction

The Corporate Social Responsibility (“CSR”) Policy of Speel Finance Company Private Limited outlines the Company’s commitment to making a positive social impact through sustainable development initiatives. The policy defines the CSR activities to be undertaken in India, accordance with Section 135 of the Companies Act, 2013, ensuring alignment with Schedule VII of the Companies Act, 2013, and related CSR Rules, 2014, as amended from time to time. It establishes guidelines and future strategies for effective CSR implementation and comes into immediate effect, subject to applicable legal provisions.

This policy has been instituted based on the CSR philosophy of Speel Finance Company Private Limited (“**Speel**” or “**Company**”) 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

Speel Finance Company Private Limited goes beyond business and extends to the implementation of socially relevant activities for the benefit of the society at large. The Company’s focus has always been to contribute to the sustainable development of the society and environment.

The Company’s CSR Policy aims to integrate corporate social responsibility into its core business approach, contributing to the sustainable development and welfare of society. It seeks to complement government efforts by addressing both immediate and long-term social and environmental impacts of its operations.

This Policy defines the scope, funding priorities, and implementation framework for Speel’s CSR initiatives and is formulated in accordance with Section 135 of the Companies Act, 2013, the Companies (Corporate Social Responsibility) Rules, 2014, and other applicable laws, as amended from time to time.



SPEEL FINANCE

SPEEL FINANCE COMPANY PVT.LTD.

CIN: U65920MH1995PTC090558

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III. Vision

The Company's CSR mission is to contribute to the social and economic development of the community through a series of contributions. The company seeks to extend support to economically, physically and socially marginalized groups and to enabling their inclusion in the mainstream 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.

The CSR Policy outlines the framework for identifying eligible CSR projects, establishing guiding principles for the annual action plan and selecting CSR projects. It also serves as a monitoring mechanism and specifies the treatment of any surplus or unspent CSR funds.

The scope of CSR activities shall align with the sectors and areas specified under Schedule VII of the Companies Act, 2013, as amended from time to time. The Company reserves the right to review and update these focus areas in accordance with statutory provisions and evolving priorities.

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.

Corporate Social Responsibility” or **“CSR”** shall mean the activities intended to be undertaken by the Company in pursuance to the provisions of Companies Act, 2013.

“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” shall mean a Committee of Board of Directors constituted as per the provisions of section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 means CSR Committee constituted by the Board of Directors of the Company, from time to time.

“Net Profits” shall mean net profit of the Company as per the financial statements prepared in accordance with the applicable provisions of the Companies Act, 2013 but shall not include the following, namely:

- a. Any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
- b. Any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Companies Act, 2013.



“Ongoing Projects” shall refer to following:

- a. Multi-year CSR projects or programmes undertaken by the Company not exceeding 3 years and excluding the year of initiation; and
- b. Project which was not approved as a multi-year project but the duration of which has exceeded beyond one year.

“Non-ongoing Projects” shall refer to projects or programmes which are expected to be completed in same financial year of initiation.

“Policy” means Corporate Social Responsibility.

“Priority Projects” shall mean such CSR projects which are selected by the CSR committee to be pursued by the Company in India.

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

- Pursuant to the provisions of Section 135 of the Companies Act, 2013 (“Act”), the Board of Directors shall constitute a CSR Committee.
- The Members of CSR shall be appointed by the Board of Directors of the Company. In terms of the proviso to the applicable provisions of the Companies Act, 2013, since the Company is not required to appoint an Independent Director under Section 149(4) of the Act, the CSR Committee shall comprise two or more Directors.

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

- Invitees to the CSR Committee: The CSR Committee may, at its discretion, invite such members of senior management of Speel from time to time to participate in the meetings of the CSR Committee and assist the CSR Committee in the implementation of the CSR Policy and shall be entitled to participate in the deliberations of the CSR Committee.
- The CSR Committee shall institute a transparent monitoring mechanism for implementation of the CSR projects or programmes or activities undertaken by the Company.

VII. Functions of the Committee

- The CSR Committee shall at all times act in a manner that is consistent with the provisions contained in this CSR Policy, the Act and CSR Rules.
- 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 and budget to be incurred.



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- Monitor the implementation of the CSR Policy from time to time.
- To ensure that the allocated CSR amount is spent on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules Corporate Social Responsibility Policy.
- As per Section 135(5) of the Companies Act, 2013, the Company is required to prioritize CSR spending in the local area and its surroundings where it operates. Accordingly, the Committee will give preference to these areas when recommending CSR initiatives. However, the Committee may also identify other areas it considers appropriate and recommend them to the Board for undertaking CSR activities.
- To ensure that before selecting any CSR project or programme for execution, the committee shall determine whether the Company intends to spend for an ongoing project or a non-ongoing project and recommend the same to the Board of Directors for their approval. The Board may modify the annual CSR action plan at any point during the financial year, based on the recommendations of the CSR Committee and supported by reasonable justification. To ensure unspent funds, if any, are transferred to specified accounts/funds within the time stipulated in law.
- Any other activity as may be required for executing CSR obligation in the Company or as may be required by law.

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 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.

The Board of Directors shall review this CSR Policy as needed.

The CSR Committee is responsible for administering the Policy, overseeing the implementation of CSR projects, and ensuring a transparent monitoring mechanism.

X. Budget

As per Section 135 of the Companies Act, 2013, Companies meeting the prescribed criteria are required to allocate a portion of their average net profits (currently 2% of the profits of the



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preceding three financial years) for CSR activities under Schedule VII. The exact CSR expenditure will be as approved by the Board and in accordance with the Act, as amended from time to time.

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.

For CSR purposes, **net profit** is defined as per Rule 2(f) of the CSR Rules. **CSR expenditure** includes all spending, including contributions to the CSR corpus or approved projects/programs recommended by the CSR Committee and approved by the Board, but excludes any spending not aligned with activities specified under Schedule VII of the Companies Act, 2013.

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 periodically, including the annual review and report the same to the Board of Directors.

In order to ensure proper utilization and monitoring of CSR funds, the Company shall obtain from the implementing agencies, the acknowledgement receipt on receiving funds for CSR spending from the Company along with a document clearly specifying the projects for which the funds are disbursed by the Company;

The CSR Committee would have the responsibility of monitoring approved projects and fund disbursements for such projects. 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. Areas of CSR

- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to Swach 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.



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- 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.
- (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 setup by the Central Government for rejuvenation of river Ganga;
- 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.
- measure for the benefit of armed force veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Paramilitary Forces (CPMF) veterans, and their dependents including widows; Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- Contribution to the Prime Minister's National Relief Fund or Prime Minister's Central 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 Schedule Tribes, other backward classes, minorities and women.
- (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).
- Rural development projects/slum area development.
- Disaster management, including relief, rehabilitation and reconstruction activities.
- And other activities, as may be recommended by the Ministry of Corporate affairs from time to time.



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XVII. Reporting and Publication of CSR Policy

Pursuant to the provisions of section 135 of the Companies Act, 2013, the Company shall disclose such information as mandated by law in the annual report on CSR which shall also be annexed to the Board's Report of the Company.

Additionally, the composition of CSR committee, CSR policy and projects undertaken by the Company shall be disclosed on the corporate website of the Company.

In accordance with the CSR Rules, the policy where applicable, published on the Company's website for public access.

XVIII. Amendment to the policy

This CSR Policy can be amended at any time pursuant to recommendation of CSR Committee followed by approval of the Board of Directors.