

CSR Policy

IIFL Home Finance Limited



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Nomenclature:

For the purpose of the CSR Policy, the following nomenclature will apply.

- **IIFL Group of Companies:**
This terminology collectively refers to all the companies that constitute the entire IIFL group, that fall under the apex holding company - IIFL Holdings Limited.
- **IIFL:**
This terminology collectively refers to those companies within the IIFL Group of companies that fall under the ambit of the Section 135 of the Companies Act 2013.
- **IIFL company:**
This terminology refers to each individual company of IIFL that falls under the ambit of the Section 135 of the Companies Act 2013.

1. Preamble

This CSR Policy has been adopted by IIFL Group. And IIFL Home Finance adopts the CSR Policy of IIFL Group in verbatim. IIFL envisions becoming the most respected brand in the financial services space in India. To realize this vision, IIFL recognizes the importance of contributing to sustainable social transformation. The approach to the business focuses on one hand, on building trust, knowledge and delivering quality service to its customers and on the other, to provide timely assistance to the country's under-banked customers. Furthermore, IIFL's CSR (Corporate Social Responsibility) projects are aligned to the focus of the business, and thereby help IIFL carve out a reputation for being one of the most committed and responsible companies in the industry.

2. Purpose

The key purpose of this Policy is to:

- Define the broad development areas that the IIFL shall undertake
- Outline the governance structure for CSR management within the IIFL
- Serve as a guiding document to help identify, execute and monitor CSR projects
- Explain the manner in which the surpluses from CSR projects will be treated

3. Policy Statement

IIFL's CSR Policy and projects are steered by the same values that guide the business of the IIFL Group of Companies. It can be summarized in one acronym – GIFTS, which stands for:

- **G**rowth
- **I**ntegrity
- **F**airness
- **T**ransparency
- **S**ervice Orientation

By applying these values to the CSR projects, IIFL aims to undertake initiatives that create sustainable growth and empowers underprivileged sections of society.

4. Scope of CSR Policy

This Policy applies to all CSR projects undertaken by IIFL and fulfills all the requirements of Section 135 of the Companies Act 2013. IIFL shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act 2013. This Policy will be periodically reviewed and updated in line with relevant codes of legislation and international standards and best practices.

5. Normal Course of Business

IIFL is engaged in the businesses of non-banking finance, housing finance, wealth management, mutual funds and asset management, equities, commodities and currency broking, investment banking,

insurance and other financial products distribution. IIFL is committed to, providing quality services to its customers while continuously undertaking measures to grow the business by expanding IIFL's reach and through other innovative measures. IIFL conducts its operations in compliance with applicable laws, regulations and standards while conforming to the highest standards in design, procurement, resource management and construction practices.

6. Mode of implementation

IIFL has constituted the IIFL Foundation, a public charitable trust to act as the principal arm that undertakes is CSR initiatives. The Foundation is entrusted with managing and implementing CSR projects on behalf of IIFL. The Foundation partners with implementation agencies that best fit the IIFL's values and priorities.

Alternatively, IIFL may choose to partner with implementing agencies that qualify all mandatory criteria of Section 135 of the Companies Act 2013.

7. Key focus areas

The CSR projects at IIFL focus on the following areas of intervention that are aligned with the items listed in Schedule VII of the Companies Act 2013.

7.1. Sustainable Livelihood

IIFL recognizes that it is imperative to mainstream the disengaged to participate in the labour force of the country and adapt to a sustainable livelihood in order to contribute positively to the nation building process. The intervention areas under livelihoods for IIFL encompass two broad verticals: Entrepreneurship and Employment. IIFL will support holistic development in regions identified by engaging with the said communities and enabling them to attain sustainable livelihood opportunities.

7.1.1. Entrepreneurship

IIFL undertakes projects that support small-scale enterprises run by marginalized communities and equip them with skills and resources to run the enterprises. These projects are further divided into those that are focused on agro-based enterprises and those that focus on non-agro-based enterprises

7.1.2. Employment

Projects that fall under this category focus on enhancing employment potential of unskilled or underskilled populations. These include pre-livelihood training, which involves career counseling for school children that focus on reducing drop-out rates of students.

7.2. Education

Education is one of the basic building blocks of a great nation. A literate population can catapult India towards realizing its demographic dividend. For IIFL, education is one of the key focus areas for CSR. The CSR projects in education will include promoting education, setting up and upgrading educational facilities and supporting institutes of higher education.

7.3. Financial literacy

IIFL believes that individuals with basic financial knowledge can make informed financial decisions and therefore, maintain better financial health. Through its CSR projects, IIFL will endeavor to provide information of financial products, especially of rewards and risks, in order to better equip the financially excluded to make informed choices with respect to money. The company has undertaken projects that focus on educating school students and slum women in this respect. The school children targeted are largely those who are studying in 8th or 9th standard, and include students both from urban schools (both private and municipal schools) and rural schools.

7.4. Healthcare

In its endeavor to promote healthcare (including preventive healthcare), CSR projects of IIFL seek to support those healthcare initiatives and medical research institutions that aim to enhance healthcare access, especially to the disadvantaged and underprivileged.

7.5. Rural development

Majority of India's population lives in the rural areas and is still deprived of infrastructure and services required for basic subsistence. With the objective of contributing towards the improvement of the economic and social wellbeing of the people in rural areas, IIFL will adopt villages and undertake projects that focus on all aspects of rural area development. These projects primarily focus on tribal villages in the states of Maharashtra and Rajasthan. ‘

7.6. Awareness on Green Building

Ensuring Environmental Sustainability through spreading awareness on Green Building Initiatives and the activities ancillary and incidental thereto. *(inserted in the Board meeting of the Company held on May 13, 2019)*

7.7. Promote Sustainable Goals

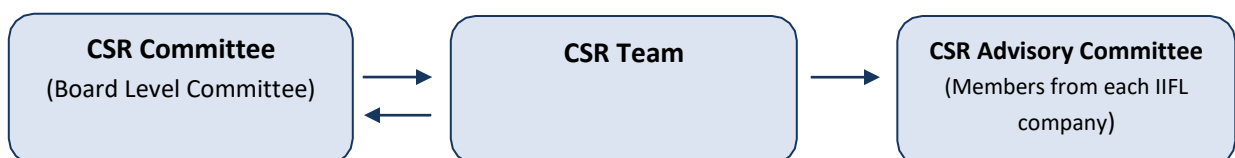
“Creating and organizing program for awareness on Green affordable housing, undertaking research and development, imparting or arranging training for personnel of Housing Boards and staff of Developers of green buildings, advertising, publication to promote Sustainable Development Goals (SDGs) and to undertake such other activities ancillary and incidental thereto.”- *inserted in the Board meeting of the Company held on*

February 6, 2020)

8. Governance Structure

IIFL has constituted a robust and transparent governing mechanism to oversee the implementation of its CSR Policy, in compliance with the requirements of Section 135 of the Companies Act 2013. At the helm of this mechanism is the Board of Directors of each of the IIFL Company, who is ultimately accountable for the CSR projects undertaken by the company.

Each IIFL company has constituted a CSR Committee at the Board level. The CSR Committee is supported by the CSR Team, comprised of representatives from the companies as well as IIFL Foundation and is guided by the CSR Advisory Committee.





8.1. CSR Committee

Each IIFL company has constituted a CSR Committee that reports to the Board of the company with respect to matters related to CSR.

8.1.1. Responsibilities

- Formulate and update IIFL’s CSR Policy, to be approved by the Board of IIFL
- Suggest areas of intervention to the Board of IIFL
- Approve projects that are in line with the CSR Policy
- Put monitoring mechanisms in place to track the progress of each project
- Recommend the CSR expenditure to the Board of IIFL, for approval
- Meet periodically a year to review the progress made

8.2. CSR Team

CSR Team is at the core of all CSR activities at IIFL. They are responsible for ensuring effective implementation of CSR projects.

8.2.1. Responsibilities

- Responsible for the execution of the decisions taken by the Board level CSR Committee
- Project and partner identification
- Partner due Diligence
- Implementation and impact assessment
- Report periodically to the Board level CSR Committee
- Review progress every quarter

8.3. CSR Advisory Committee

The Advisory Committee provides inputs to the CSR Team to help them plan and implement CSR projects

9. CSR Budget

The total budget for the CSR projects will be decided annually in accordance with the goals and priorities of IIFL.

10. Project Life-Cycle

At IIFL, the CSR Committees of the Board of the each IIFL company will work closely with IIFL Foundation, the CSR Team and the CSR Advisory Committee to identify projects that are in alignment to the vision and goals of the companies.

Following the approval of the Boards of each IIFL company, the CSR Team will formulate implementation plans for the projects specifying the following:

- (i) Activities to be undertaken
- (ii) Budgets proposed
- (iii) Time frame of implementation
- (iv) Responsibilities and authorities for implementation
- (v) Results expected to be achieved post implementation.

The project will be implemented by IIFL Foundation or the implementing agency that has been identified by IIFL for the specific project.

Monitoring

The CSR Team will monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports. Mechanisms to track data and monitor projects will be established to ensure the transparency and efficiency of the implementation process. The projects will be evaluated against the milestones defined in the implementation plan of the project. The CSR Team will present monitoring reports of the projects to the Board level CSR Committee on a periodic basis.

Reporting

The CSR Committee of the Board, based on reports presented by the CSR Team, will annually publish report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act 2013. The CSR Committee shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR Policy is in compliance with the approved CSR Policy of the Company.

The CSR Policy on being approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

11. Treatment of Surpluses

Any surplus generated from CSR projects undertaken by each IIFL company will be tracked and channelized into the IIFL company's CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.

Confidential Document

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