

June 22, 2024

To,

**BSE Limited**

Corporate Relationship Department  
25<sup>th</sup> Floor, Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai - 400 001.  
**BSE Scrip Code: 524000**

**National Stock Exchange of India Limited**

The Listing Department,  
Exchange Plaza,  
Bandra- Kurla Complex, Bandra (East),  
Mumbai - 400 051.  
**NSE Symbol: POONAWALLA**

**Subject: Business Responsibility and Sustainability Report for the financial year 2023-24 pursuant to Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”)**

Pursuant to Regulation 34(2)(f) of the SEBI Listing Regulations, we are enclosing herewith a copy of the Business Responsibility and Sustainability Report for the financial year 2023-24, which forms part of the Annual Report for the financial year 2023-24.

The Annual Report is also available on the website of the Company at [www.poonawallafincorp.com](http://www.poonawallafincorp.com)

This is for your information and record.

Thanks & Regards,

Yours Faithfully,

**For Poonawalla Fincorp Limited**

**Shabnum Zaman**  
**Company Secretary**  
**ACS: 13918**

**Enc: A/a**

# Business Responsibility & Sustainability Reporting (BRSR)

## SECTION A: GENERAL DISCLOSURES

### I. Details of the listed entity

1. Corporate Identity Number (CIN) of the Listed Entity	L51504PN1978PLC209007
2. Name of the Listed Entity	Poonawalla Fincorp Limited ('the Company')
3. Year of incorporation	December 18, 1978
4. Registered office address	201 and 202, 2 <sup>nd</sup> floor, AP81, Koregaon Park Annex, Mundhwa, Pune – 411036, Maharashtra, India
5. Corporate address	201 and 202, 2 <sup>nd</sup> floor, AP81, Koregaon Park Annex, Mundhwa, Pune - 411036, Maharashtra, India
6. E-mail	secretarial@poonawallafincorp.com
7. Telephone	020- 67808090
8. Website	<a href="http://www.poonawallafincorp.com">www.poonawallafincorp.com</a>
9. Financial year for which reporting is being done	01-04-2023 to 31-03-2024
10. Name of the Stock Exchange(s) where shares are listed	BSE Limited National Stock Exchange of India Limited
11. Paid-up Capital	₹1,549,101,324/-
12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Shabnum Zaman Company Secretary Telephone - 020- 67808090 Email address – <a href="mailto:secretarial@poonawallafincorp.com">secretarial@poonawallafincorp.com</a>
13. Reporting boundary	Standalone basis
Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	
14. Name of the assurance provider	-
15. Type of the assurance provider	-

### II. Products/services

#### 16. Details of business activities (accounting for 90% of the turnover):

S. no.	Description of main activity	Description of business activity	% of turnover of the entity (FY2023-24)
1	Financial and insurance Service	Financial and Credit leasing activities	100

#### 17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

S. No.	Product/Service	NIC Code	% of total turnover contributed
1	Financial and related services	K Group: 649	100

Key products and services of the Company: Financing for Pre-owned Car, Loan Against Property and Small and Medium Enterprises Financing

### III. Operations

#### 18. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total
National	102 (Branches)	1 (Corporate office)	103
International	0	0	0

## 19. Markets served by the entity:

### a. Number of locations.

Locations	Number
National (No. of States)	20 states
International (No. of Countries)	None

### b. What is the contribution of exports as a percentage of the total turnover of the entity?

The Company does not export any products/services. Thus, this question is not applicable.

### c. A brief on types of customers:

The Company focuses on two well defined customer segments of consumer and MSME. For these segments the Company offers a wide array of products and services to cater to their specific ever evolving needs. The customers are both individuals as well as entities. In consumer segment it primarily consists of the salaried customers, whereas for MSME it is the entity who is the customer represented through the proprietor, partner or directors in line with the business constitution.

Our diversified products and services include the following:

- Personal Loan to various categories of professionals (CA, CS, doctors, salaried employees, government employees) for various purposes including but not limited to home renovation, travel, medical emergency, wedding.
- Business Loan: Provided to MSME, for working capital and other short-term financing needs.
- Professional Loans: For CA, CS, doctors to expand their practice.
- Loan Against Property to MSMEs for their working capital or other business requirements salaried individual and self employed professionals.
- Pre-owned car loan to purchase a car or to refinance the car for personal or business requirement.
- Medical Equipment Loan & Machinery Loan to cater to asset funding requirement of Doctors and MSMEs.
- Supply Chain Finance to cater to upstream and downstream financing needs of anchors thereby helping the MSMEs have easy access to capital.
- Other Loans: Merchant Cash Advance, Digital Consumption Loan, Auto Lease.

## IV. Employees

### 20. Details as at the end of Financial Year:

#### a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>Employees</b>						
1.	Permanent (D)	2384	2065	86.62%	319	13.38%
2.	Other than Permanent (E)	0	0	0	0	0
<b>3.</b>	<b>Total employees (D + E)</b>	<b>2384</b>	<b>2065</b>	<b>86.62%</b>	<b>319</b>	<b>13.38%</b>
<b>Workers</b>						
4.	Permanent (F)					
5.	Other than Permanent (G)					
<b>6.</b>	<b>Total workers (F + G)</b>					

**b. Differently-abled Employees and workers:**

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
<b>Differently abled employees*</b>						
1.	Permanent (D)					
2.	Other than Permanent (E)			0		
<b>3.</b>	<b>Total differently-abled employees (D + E)</b>					
<b>Differently abled workers</b>						
4.	Permanent (F)					
5.	Other than Permanent (G)			Not Applicable		
<b>6.</b>	<b>Total differently-abled workers (F + G)</b>					

\*The Company embraces diversity and does not discriminate against anyone based on their race, gender, religion, beliefs, disability, marital status, age, identity or any other factor.

**21. Participation/Inclusion/Representation of women:**

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	10	1	10%
*Key Management Personnel	4	1	25%

\*The Company has 4 KMPs of which 2 are Directors.

**22. Turnover rate for permanent employees and workers:**

	FY 2023-24			FY 2022-23			FY 2021-22		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	10%	1%	11%	22%	2%	24%	31%	2%	33%
Permanent Workers	Not applicable								

**V. Holding, Subsidiary and Associate Companies (including joint ventures)**

**23. (a) Names of holding / subsidiary / associate companies / joint ventures :**

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	*Rising Sun Holdings Pvt Ltd	Holding	NA	
2	**Jaguar Advisory Services Private Limited	Joint venture	48.89%	No

\* Rising Sun Holdings Pvt Ltd holds 62.13% shares in the Company as on March 31, 2024

\*\*Refer note no 17 of the standalone financial statement.

Grihum Housing Finance Limited ('GHFL') (formerly, Poonawalla Housing Finance Limited), Subsidiary till July 26, 2023, refer note no. 17 of the standalone financial statements.

**VI. CSR Details**

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) - Yes

(ii) Turnover (₹ in Crores) - ₹3,151.82 Crores

(iii) Net worth (₹ in Crores) – ₹8,116.40 Crores

## VII. Transparency and Disclosures Compliances

### 25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No)  (If Yes, then provide web-link for grievance redress policy)	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes E-mail at <a href="mailto:csr@poonawallafincorp.com">csr@poonawallafincorp.com</a> ( <a href="https://poonawallafincorp.com/contact-us.php">https://poonawallafincorp.com/contact-us.php</a> )	0	0	Community grievances are received through Implementing agencies	0	0	
Investors (other than shareholders)	Yes ( <a href="https://poonawallafincorp.com/investor-info.php">https://poonawallafincorp.com/investor-info.php</a> )	1	0	None	2	0	None
Shareholder	Yes ( <a href="https://poonawallafincorp.com/investor-info.php">https://poonawallafincorp.com/investor-info.php</a> )	5	0	None	3	0	None
Employees and workers	Yes ( <a href="https://poonawallafincorp.com/pfca/assets/pdf/PFL-Posh-Policy.pdf">https://poonawallafincorp.com/pfca/assets/pdf/PFL-Posh-Policy.pdf</a> )	0	0	None	1	0	None
Customers	Yes <a href="https://poonawallafincorp.com/pdf/Grievance-Redressal-Policy.pdf">https://poonawallafincorp.com/pdf/Grievance-Redressal-Policy.pdf</a>	3571	57	None	1717	37	None
Value Chain Partners	No	0	0	Vendors route their grievances through the business team that they engage with, there have been no substantial grievances reported in this reporting period. SPOC details and dispute resolutions clause is available in the master service agreement.	0	0	
Other (please specify)	Not Applicable						

## 26. Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Customer Privacy & Data Security	Risk	<p>The company's technology infrastructure plays a big role in its operations. Most transactions are completed digitally, which raises the risk for cyber and information security.</p> <p>Further, the personal details required for financial transactions are available with the Company and thereby ensuring the data security is of prime importance</p>	<p>The Company has a Cyber Security Policy and Privacy policy in place.</p> <p>The Company ensures the policies are implemented at an organizational level.</p> <p>Various awareness sessions and internal newsletters, mock drills are conducted to avoid any instances of breach of customer privacy and data security.</p> <p>Further a Consumer Awareness section- Cyber Threats and Frauds is also available on the website as a cautionary notice.</p>	<p>Negative</p> <p>Incidents of data breaches or leakages may cause reputational damage.</p> <p>Instances of loss of customer data may lead to potential financial losses.</p> <p>There may be litigation cases filed by customer due to instances of data leakage.</p>
2	Customer Experience	Opportunity	Any business's continued expansion depends on providing an outstanding customer experience. Loyalty, customer retention, and brand advocacy are all aided by providing a positive customer experience.	-	Positive
		Risk	The Company offers financial products and services to millions of customers, any bad customer experience could result in customer loss or even damage to the company's reputation.	<p>The Company has a Fair Practice Code and Grievance Redressal Policy which helps customers to raise grievances.</p> <p>The Company is using an integrated approach that is technology driven to enhance customer experience.</p> <p>Maps and monitors the turnaround time of complaints and accordingly trains the frontline staff to address the customer grievances.</p> <p>Continuous call quality monitoring has been implemented to enable analysis of repeat calls and avoid delays in grievance redressal.</p>	<p>Negative</p> <p>Loss of reputation can lead to customer attrition which can thereby affect the business</p>

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk / opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3	Digital Innovation and Disruption/ Digitalization	Opportunity	The interest and acknowledgement of digital exchanges are expanding in India. Digital innovation to improvise organizational practices and improve customer services is at the core of the Company's business. Customers across age groups are steadily appreciating digitalization and therefore the Company is further focusing on implementing technology and digital led product transformation for faster service delivery, increased efficiency of existing processes and optimal resource utilization.	-	Positive  Reputation of Company due to improved digital experience of customers and low complaints  strengthened processes and systems internally

The Risk Management Committee has additional role and responsibility to address the ESG risks which is integrated to the enterprise risk management as per SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 (SEBI Listing Regulations).

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

Disclosure Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
<b>Policy and management processes</b>									
1. a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available	It has been the Company's practice to upload all policies on the internal portal for the information and implementation by the internal stakeholders and some of these policies are also available at the following website.  Policies   Investor relations (Company Policies, Committee Details and Other Governance Details of PFL (poonawallafincorp.com))								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes, When acting on behalf of the company, third parties like consultants and agents are required to abide by the Code of Business Ethics as well as the Code of Conduct for Direct Selling Agents (DSAs), Direct Marketing Agents (DMAs) and Debt Recovery Agents (DRAs).								
4. Name of the national and international codes/certifications/labels/standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) mapped to each principle.									
Principle 1 to 9	-								

<b>5. Specific commitments, goals and targets set by the entity with defined timelines, if any.</b>	We aspire to have women represent at least 16% of our workforce by FY25. Our organisation acknowledges the significance of establishing targets to assess advancement towards achieving all the principles of the National Guidelines on Responsible Business Conduct (NGRBC). Considering that we are in our initial years of ESG journey, we intend to specify our objectives and targets in the upcoming reporting period.
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<b>6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.</b>	-
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**Governance, leadership and oversight**

<b>7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)</b>	<p>We are pleased to share an overview of the environmental, social, and governance (ESG) achievements we have made as an organization. We recognize the importance of transparency and accountability in our ESG journey and Governance remains a pillar of our ESG strategy. We have implemented robust governance frameworks, enhanced board oversight, strengthened risk management practices and effectively embraced digital transformation while upholding compliance standards. We have made strides in minimizing our environmental impact by adopting waste minimization measures and creating awareness among our stakeholders regarding judicious use of water and energy. On the social front, we have recognized the need to foster diversity, equality, and inclusion within our organization. We have implemented inclusive policies and training programs to ensure equal opportunities for all employees. We have also adopted various initiatives to drive customer centricity. Furthermore, we actively participate in corporate social responsibility (CSR) initiatives to make positive contributions to the communities where we operate. In conclusion, as we continue to embrace new challenges and opportunities, we remain committed to transparent reporting, active stakeholder engagement, and continuous improvement in our ESG performance. I extend my gratitude to all our employees, customers, partners, and stakeholders for their invaluable support and contributions in our ESG journey. Together, we can build a sustainable future that respects our planet, empowers communities, and delivers long-term prosperity.</p>
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<b>8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy/policies</b>	Abhay Bhutada Managing Director DIN: 03330542
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<b>9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.</b>	Yes Corporate Social Responsibility Committee and Environmental Social Governance Committee
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**10. Details of Review of NGRBCs by the Company:**

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee	Frequency (Annually/ Half yearly/ Quarterly/ Any other – please specify)
	P1 P2 P3 P4 P5 P6 P7 P8 P9	P1 P2 P3 P4 P5 P6 P7 P8 P9
Performance against above policies and follow up action	Yes (Principle 1,2,3,4,5,6,7,8,9) Committees of the Board	Annually or on need basis
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Yes Committees of the Board The Company is in compliance with the regulations, as applicable.	Annually or on need basis

<b>11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.</b>	<table border="1"> <tr> <th>P1</th> <th>P2</th> <th>P3</th> <th>P4</th> <th>P5</th> <th>P6</th> <th>P7</th> <th>P8</th> <th>P9</th> </tr> <tr> <td colspan="9">No.</td> </tr> </table> <p>All policies and processes are subject to audits and internal reviews conducted by the Company from time to time. All policies of the Company are evaluated and reviewed internally as and when required.</p>	P1	P2	P3	P4	P5	P6	P7	P8	P9	No.								
P1	P2	P3	P4	P5	P6	P7	P8	P9											
No.																			



**12. If answer to question (1) above is 'No' i.e. not all Principles are covered by a policy, reasons to be stated:**

Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
The entity does not consider the Principles material to its business (Yes/No)									
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

Not applicable

The Company works closely with collective trade and industry associations as and when required.

Sr. No	Principle No. and Definition	List of Policies
1	<b>Principle 1:</b> Businesses should conduct and govern themselves with integrity in a manner that is ethical, transparent and accountable	Code of Business Ethics, Code of Conduct and Discipline Rules, Code of Practices and Procedures of Fair Disclosure; Code of Internal Procedure and Conduct for Prohibition of Insider Trading; Code of Independent Director, Compliance Policy; KYC and Anti-Money Laundering (AML) Policy, Policy for Determination of Materiality of Events or Information; Policy on Dealing with Related Party Transactions; Breach of Integrity and Whistle Blower/Vigil Mechanism Policy; Remuneration Policy, Corporate governance policy, Fair Practice Code, Grievance Redressal Policy, Outsourcing Policy, Investor Grievance Policy, Environmental and Social Governance Policy & Governance framework, Code of Conduct for Direct Selling Agents (DSAs) / Direct Marketing Agents (DMAs)/ Debt Recovery Agents (DRAs)
2	<b>Principle 2:</b> Businesses should provide goods and services in a manner that is sustainable and safe	Cyber Security Policy, Information Security Policy, Information Technology Management Policy, Risk Management Policy, Policy on process for disposal of E-Waste Items, Business Continuity Policy, Environmental and Social Governance Policy & Governance framework
3	<b>Principle 3:</b> Businesses should respect and promote the well-being of all employees, including those in their value chain	Breach of Integrity and Whistle Blower/Vigil Mechanism Policy, Policy on Prevention and Redressal of Sexual Harassment, Rewards and Recognition Policy, Leave Policy, Diversity and Inclusion Policy, Learning and Development Policy, Employee Education Policy, Code of Business Ethics
4	<b>Principle 4:</b> Businesses should respect the interests of and be responsive towards all its stakeholders	Corporate Social Responsibility Policy, Environmental and Social Governance Policy & Governance framework, Grievance Redressal Policy, Investor Grievance Policy
5	<b>Principle 5:</b> Businesses should respect and promote human rights	Diversity and Inclusion Policy, Policy on prevention and Redressal of Sexual Harassment, Code of Business Ethics, Code of Conduct for Direct Selling Agents (DSAs) / Direct Marketing Agents (DMAs)/ Debt Recovery Agents (DRAs)
6	<b>Principle 6:</b> Businesses should respect, protect and make efforts to restore the environment	Environmental and Social Governance Policy & Governance framework, Risk Management Policy, Policy on Process for Disposal of E-Waste Items
7	<b>Principle 7:</b> Businesses when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent	Environmental and Social Governance Policy & Governance framework, Compliance Policy
8	<b>Principle 8:</b> Businesses should promote inclusive growth and equitable development	Corporate Social Responsibility Policy, Environmental and Social Governance Policy & Governance framework
9	<b>Principle 9:</b> Businesses should engage with and provide value to their consumers in a responsible manner	Interest and Penal Charge Policy, Fair Practice Code, Information Security Policy, Cyber Security Policy, Information Technology Management, Grievance Redressal Policy, Environmental and Social Governance Policy & Governance framework

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as 'Essential' and 'Leadership'. While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

### Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

#### Essential Indicators

#### 1. Percentage coverage by training and awareness programmes on any of the Principles during the financial year:

Segment	Total number of training and awareness programmes held	Topics / principles covered under the training and its impact	%age of persons in respective category covered by the awareness Programmes
Board of Directors	6 Refer weblink:  <a href="#">PFL-Familiarization-Program-FY23-24.pdf</a> ( <a href="http://poonawallafincorp.com">poonawallafincorp.com</a> )	Sessions on business and performance, regulatory updates and compliance, Corporate Social Responsibility were conducted.  Also, sessions were conducted on below mentioned topics:  i. Governance for Directors on Boards of Banks, FIs and NBFCs:  The program was designed to provide insight on Strategic aspects of Assurance functions –Risk Management, Compliance & Audit, Corporate Governance Framework in Banks/FIs/NBFCs, Governance challenges in use of Advanced Technologies, Corporate Governance & Ethics, KYC and AML measures Regulatory expectations, Cyber Security & Resilience.  ii. Know Your Customer (KYC) and Anti Money Laundering (AML):  The program dealt with KYC & AML Risk Management, KYC & AML Regulatory Framework, Supervisory Observations and Expectations on KYC and AML Compliance, Key aspects of Transaction Monitoring, Central KYC Registry and Compliance, KYC & AML Compliance: International Perspective.  Impact: Several critical insights into regulatory perspectives.	100%
Key Managerial Personnel	5	Digital Data Protection Act, 2023, Corporate Governance, Road to Compliance: KYC, AML, INFOSEC, Data Leakage Prevention, POSH, Understanding of Prohibition of Insider Trading, Cyber Security, KYC Awareness, Regulatory Update, POSH Awareness, Breach of Integrity and Whistle Blower Vigil Mechanism, Code of Conduct.  Impact: The programs have ensured strategic alignment to the larger organization goals and critical insights on changing regulations and the need to adopt with changing customer needs like data privacy and security.	100%
Employees other than BoD and KMPs	10	Road to Compliance: KYC, AML, INFOSEC, Data Leakage Prevention, POSH, Understanding of Prohibition of Insider Trading, Cyber Security, KYC Awareness, Regulatory Update, Digital Data Protection Act, 2023, POSH Awareness, Breach of Integrity and Whistle Blower Vigil Mechanism, Code of Conduct, functional skills and knowledge program, program pertaining to skill upgradation.  Impact: Functional skilling and upskilling programs have resulted in new joiners quickly adapting and being ready to deliver business results. Function specific programs have impacted areas like productivity, improved TAT and customer satisfaction score and reduction in process lapse/errors.	99.8%
Workers	Not applicable		

Presentations were delivered at the Board and Committee meetings throughout FY 2023-24. The Board of Directors received information on a variety of subjects related to topics on economic, or regulatory changes in their capacity as members of various committees of the Board. The new directors must go through induction and familiarization programme which is mandatory as per SEBI Listing Regulations. The familiarization program also includes explaining to the independent directors about the ongoing events of the company, business structure, codes and policies, duties, liabilities etc. The same is available on the website at [PFL-Familiarization-Program-FY23-24.pdf](https://www.poonawallafincorp.com/PFL-Familiarization-Program-FY23-24.pdf) ([poonawallafincorp.com](https://www.poonawallafincorp.com))

The Board of Directors and KMPs received a briefing on their duties, with a particular focus on Corporate Governance. They were also updated on the latest advancements in IT, cybersecurity, digitalization programs, and legal requirements, as well as customer centricity. The Company prioritized induction training for all employees, which included 9 principles emphasizing governance standards and the code of business ethics. The annual code of conduct training was made mandatory for all employees, along with virtual modules on compliance. Employees must achieve a pass percentage in compliance training modules, and if they fail to do so, they are required to retake the module. The Company also provides functional, competency, and behavioral programs as well as specific trainings tailored to the needs of various functions.

**2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity’s website):**

Monetary					
	NGRBC Principle	Name of the regulatory/ Enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine					
Settlement			Nil		
Compounding fee					
Non-Monetary					
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/ No)	
Imprisonment					
Punishment			Nil		

**3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.**

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Not applicable as there has been no such cases.	

**4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.**

Yes. The Company has Code of Business Ethics, the coverage of this code includes aspects related to Conflict of Interest, customer relations, business interest, gifts to an individual or relatives or associates or third parties or political donations. Please find further details at [Code of Business Ethics](https://www.poonawallafincorp.com/CodeofBusinessEthics) ([poonawallafincorp.com](https://www.poonawallafincorp.com)).

The Company also has a defined Code of Conduct & Discipline Rules to deter wrongdoings and to foster and maintain the standard of business conduct for employees, trust and confidence in the professionalism and the integrity of the employees. This code is applicable to all employees across functions, geographies and grades. The abovementioned code aims to maintain the standard of business conduct and ethics and serve as guideline to report fraud, unethical or illegal practice.

The Company has also adopted Breach of Integrity and Whistle Blower/Vigil Mechanism Policy, please find further detail at <https://poonawallafincorp.com/pfca/assets/pdf/Breach-of-Integrity-and-Whistle-Blower-Vigil-Mechanism-Policy.pdf>

**5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption.**

	<b>FY 2023-24 Current Financial Year</b>	<b>FY 2022-23 Previous Financial Year</b>
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil
Workers	Not applicable	

**6. Details of complaints with regard to conflict of interest:**

	<b>FY 2023-24 Current Financial Year</b>		<b>FY 2022-23 Previous Financial Year</b>	
	<b>Number</b>	<b>Remarks</b>	<b>Number</b>	<b>Remarks</b>
Number of complaints received in relation to issues of Conflict of Interest of the Directors	0		0	
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	0		0	

**7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.**

As there have been no cases, this is not applicable. Further, we have defined processes to ensure compliance with corruption and conflict of interest.

**8. Number of days of accounts payables (Accounts payable \*365/Cost of goods/services procured) in the following format:**

	<b>FY 2023-24 Current Financial Year</b>	<b>FY 2022-23 Previous Financial Year</b>
Number of days of accounts payable	1.49	3.25

**9. Open-ness of business:**

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

<b>Parameters</b>	<b>Metrics</b>	<b>FY 2023-24 Current Financial Year</b>	<b>FY 2022-23 Previous Financial Year</b>
<b>Concentration of Purchases</b>	Purchases from trading houses as % of total purchases		
	Number of trading houses where purchases are made from		-
	Purchases from top 10 trading houses as % of total sales		
<b>Concentration of Sales</b>	a. Sales to dealers/distributors as % of total sales		
	Number of dealers/distributors to whom sales are made	As we are a non-banking financial company, this is not applicable.	
	Sales to top 10 dealers / distributors as % of total sales to dealers/distributors		
<b>Shares of RPTs in</b>	Purchases (Purchases with related parties/Total Purchases)		
	Sales (Sales to related parties/Total Sales)		-
	Loans and Advances (Loans and Advances to related parties/Total Loans and Advances)		
	Investments (Investments in related parties/Total Investments made )	0.002%	61.640%

## Leadership Indicators

### 1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year

Total number of awareness programmes held	Topics / principles covered under the training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes.
-	-	-

The number of awareness programmes are not monitored currently but the clauses regarding ethical, transparent are part of vendor agreements. Regular discussions are organized with the direct selling agents (DSAs) and value chain partners to ensure compliances to the clauses mentioned in the agreements and code of conduct.

### 2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If Yes, provide details of the same.

Yes, we have implemented processes to avoid/manage conflict of interests involving members of the Board. The details are mentioned below:

- i. Every Director on the Board is required to make disclosure of his/her interest or concern in other entities (under Section 184 of the Companies Act, 2013 ('Act') as also the parties to which such Director is related to (as under Section 2(76) of the Act and other applicable laws). Such disclosure is required to be made as and when a Director attends first Board Meeting after his/her appointment on the Board and thereafter at every first Board Meeting held in a financial year as well as within thirty days from any change in the disclosure previously given by such director.
- ii. Director, if interested or concerned in any transaction(s) or arrangement(s) to be entered into by the Company, does not participate in the discussion and passing of the resolution thereon.
- iii. We have also put in place necessary mechanisms and have formulated a Policy on Related Party Transactions, keeping in view the requirements under Regulation 23 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('SEBI Listing Regulations') and the provisions of the Act. This Policy provides a framework to ensure proper identification, approval and reporting of Related Party Transactions.
- iv. All transactions with Related Parties of the Company are previously approved by the Audit Committee of the Company. The Audit Committee also grants Omnibus Approval for Related Party Transactions of a recurring nature. Related Party Transactions, if not in the ordinary course or not at arm's length, are placed before the Board based on the Audit Committee's recommendation for its consideration and approval. If such transactions (which are placed before the Board of Directors) breach the threshold limits prescribed under Section 188 of the Act or if any transaction with a Related Party is material in nature as prescribed under Regulation 23 of the SEBI Listing Regulations, such transactions are also put up before the shareholders for their consideration and approval.
- v. At the Audit Committee, only the Independent Directors who are members of the Audit Committee, consider and approve the transactions with related parties. At the Board, only those Directors who are not parties to the transaction(s) or arrangement(s) in subject or those who are not interested or concerned therein, participate to consider them. The interested Directors neither participate nor do they vote on the resolution of Related Party Transaction. While seeking Shareholders' approval, no Related Party of the Company, whether party to a particular transaction or not, votes to approve such transaction.
- vi. The Company has laid down a Code of Conduct for all the Board Members and Senior Executives of the Company including a Code of Conduct for Independent Directors.

**Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe**

**Essential Indicators**

- 1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

	<b>FY 2023-24 Current Financial Year</b>	<b>FY 2022-23 Previous Financial Year</b>	<b>Details of improvements in environmental and social impacts</b>
R&D Capex	As we are a non-banking financial company, capital expenditure and research and development expenses are not directed towards technologies that improve environmental and social impacts. We have successfully completed digital transformation & Phase 2 of technology transformation enabling Digital First products, processes & entire customer journey and now we are evaluating opportunities to finance products that may have impact on the environment and communities. We have also implemented AI based solution for automated calling to customers for their EMI's, Multiple Reminders etc.		

- 2. Does the entity have procedures in place for sustainable sourcing? (Yes/No)**

Yes

**b. If yes, what percentage of inputs were sourced sustainably?**

Being a non-banking financial company, our direct consumption of consumable and input materials is limited. The primary resource consumption of the Company is printing paper. The Company entered into vendor agreements for procurement of paper and tracks consumption of resources to reduce their wastage.

Above all, the Company also emphasized on integrating sustainable practices within the value chain (suppliers and customers) through acceptance of payments through automated clearing house (ACH)/ Auto Debit/Digital/online mode which in turn helped the customers in paper less transaction. To avoid further usage of paper, the customer documents are stored digitally.

The corporate office is a Platinum certified Green Building. Certified green buildings focus on the use of recycled materials instead of virgin materials. Such materials are certified, have lower carbon footprint and are sourced and used in a sustainable manner with minimal or no adverse effects to the environment. The Company is not tracking the percentage of inputs sourced sustainably.

- 3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.**

The Company's primary waste products comprise paper waste and electronic waste.

**Paper Waste:** The Company has minimized paper usage through digital technologies and process optimization. As a non-banking financial company, paper is a major resource consumed. To promote sustainable service delivery, the Company encourages paperless transactions and implements a paper recycling initiative for old printouts. Payments are accepted through electronic modes, reducing the need for paper. Vendor payments are made electronically as well. Various initiatives are in place to reduce paper usage, such as online lead generation, digital customer transactions, an e-learning platform for employees, and SMS updates during loan processing. System-generated reports are no longer printed, and files are processed digitally whenever possible. The Company prioritizes digital storage of documents and communicates with customers primarily via email, SMS, and inbound calls.

Encouraging usage of green chemicals for corporate office and branches to reduce harmful effect on the users and the environment.

Efforts are being made to reduce the usage of paper cups by introducing reusable glasses and cups made up by organic material like rice husk. Tissue papers are replaced with recycled/recyclable paper rolls to curb the usage and wastage.

Enhanced awareness about sustainability among employees through frequent e-mailers, digital content display across the offices and awareness workshops.

During closure/relocation of the branches, scrap is being disposed off through Govt certified green vendors.

**E waste:** The Company has put in place mechanisms for responsible disposal of waste through authorized third-party vendors. The Company has in place a Policy on process for disposal of E-Waste Items. Further, the device management policy of the Company helps to monitor and repair devices as required.

**4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No).**

Being a non-banking financial company, extended producer responsibility is not applicable to our activities.

**If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.**

Not applicable

**Leadership Indicators**

**1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

NIC Code	Name of Product /Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/No) If yes, provide the web-link.
Not applicable					

**2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.**

Name of Product / Service	Description of the risk / concern	Action Taken
Not applicable		

**3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).**

Indicate input material	Recycled or re-used input material to total material	
	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Not applicable		

**4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed of.**

	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)						
E-waste						
Hazardous waste						
Other Waste						
Not applicable						

**5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.**

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
Not applicable	



**Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains**

**Essential Indicators**

**1. a. Details of measures for the well-being of employees.**

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent employees</b>											
Male	2065	2065	100	2065	100	0	0	2065	100	0	0
Female	319	319	100	319	100	319	100	0	0	319	100
<b>Total</b>	<b>2384</b>	<b>2384</b>	<b>100</b>	<b>2384</b>	<b>100</b>	<b>319</b>	<b>13.38</b>	<b>2065</b>	<b>86.62</b>	<b>319</b>	<b>13.38</b>
<b>Other than Permanent employees</b>											
Male											
Female	Not Applicable										
Total											

**b. Details of measures for the well-being of workers:**

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care Facilities	
		Number (B)	% (B/A)	Number (C)	% (C/A)	Number (D)	% (D/A)	Number (E)	% (E/A)	Number (F)	% (F/A)
<b>Permanent workers</b>											
Male											
Female	Not applicable										
Total											
<b>Other than Permanent workers</b>											
Male											
Female	Not applicable										
Total											

**d. Spending on measures towards well being of employees and workers (including permanent and other than permanent ) in the following format-**

	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Cost incurred on well-being measures as a % of total revenue of the Company	0.21%	0.41%

**2. Details of retirement benefits, for Current FY and Previous Financial Year**

Benefits	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
	Provident Funds	100%	Not applicable	Y	100%	Not applicable
Gratuity	100%	Not applicable	Not applicable	100%	Not applicable	Not applicable
Others – please specify	0	Not applicable	0	0	Not applicable	0



### 3. Accessibility of workplaces

**Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.**

Yes (corporate office)

- Currently the Company does not have any differently abled employees. The Company welcomes equal opportunity and diversity and thus no discrimination is observed during the hiring process. Therefore, to ensure the workplace is inclusive of differently abled, the Company's corporate office building is made accessible to prospective differently abled employees with ramps and elevators. This will help to create an environment that is safe and eliminate the barriers of belongingness.
- Dedicated rest rooms are provided in the office.
- Onsite Nursing and Physician consultation for employees.
- Creche and medical room facility are also available in the office.
- Braille and voice enabled elevators are provided in the office.

The Company is an Equal Opportunity employer and has zero tolerance towards discrimination, the same is articulated in the Equal Opportunity Policy. Corporate office is disabled friendly.

### 4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.

Yes. The Company has an Equal Opportunity Policy which is internal to the Company and is communicated to all the permanent employees. Equal employment opportunity is also articulated in the <https://poonawallafincorp.com/pfca/assets/pdf/PFL-Code-of-Business-Ethics.pdf>

### 5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	100	100	Not applicable	Not applicable
Female	100	86	Not applicable	Not applicable
Total	100	92	Not applicable	Not applicable

### 6. Is there a mechanism available to receive and redress grievances for the following categories of employees and workers? If yes, give details of the mechanism in brief : Yes

	(If Yes, then give details of the mechanism in brief)
Permanent Workers	Not applicable
Other than Permanent Workers	Not applicable
Permanent Employees	<p>The Company enables employees to work without fear of prejudice, gender discrimination and harassment. The Company has zero tolerance towards any non-compliance of these principles. 'Prevention of Sexual Harassment' Policy serving as grievance mechanisms for its employees to report or raise their concerns confidentially and anonymously, and without fear of any retaliation. Employees can raise grievances/concern at dedicated email id as mentioned in the policy. Further details can be obtained at <a href="https://poonawallafincorp.com/pfca/assets/pdf/Posh-Policy.pdf">https://poonawallafincorp.com/pfca/assets/pdf/Posh-Policy.pdf</a></p> <p>The Company has 'Breach of Integrity and Whistle Blower/Vigil Mechanism Policy. Whistleblower Policy explains the mode of communication for alleged wrongful conduct.</p> <p>Mode of Communication: Email to <a href="mailto:whistleblower@poonawallafincorp.com">whistleblower@poonawallafincorp.com</a> or send a complaint at a mentioned postal address. Communicate to the employee or senior management team who can then forward the same to Head-HR. The same must then be forwarded to Ethics &amp; Disciplinary Committee. Further details can be obtained at (<a href="#">Breach-of-Integrity-and-Whistle-Blower-Vigil-Mechanism-Policy.pdf</a> (poonawallafincorp.com))</p> <p>Employees can report with Multiple Channels –</p> <p>Email</p> <p>HR monthly drives are conducted so that employees can reach out to the HR for any concerns.</p> <p>Engagement with Business HR team on a monthly basis to focus on the closure of open queries and resolution of challenges</p>
Other than Permanent Employees	Not applicable

**7. Membership of employees and worker in association(s) or Unions recognised by the listed entity:**

Category	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Total employees /workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B/A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D/C)
<b>Total Permanent Employees</b>						
- Male						Not applicable
- Female						
<b>Total Permanent Workers</b>						
- Male						Not applicable
- Female						

**8. Details of training given to employees and workers:**

Category	FY 2023-24 Current Financial Year					FY 2022-23 Previous Financial Year				
	Total	On Health and safety measures		On Skill upgradation		Total	On Health and safety measures		On Skill upgradation	
	(A)	No. (B)	% (B/A)	No. (C)	% (C/A)	(A)	No. (B)	% (B/A)	No. (C)	% (C/A)
	<b>Employees</b>									
Male	2065	1176	57	1843	89	2211	690	31.21	1857	83.99
Female	319	189	59	275	86	241	131	54.36	217	90.04
<b>Total</b>	<b>2384</b>	<b>1365</b>	<b>57</b>	<b>2118</b>	<b>89</b>	<b>2452</b>	<b>821</b>	<b>33.48</b>	<b>2074</b>	<b>84.58</b>
	<b>Workers</b>									
Male										
Female										Not applicable
Total										

The Company re-skilled its employees and provided career growth opportunities, micro-learning, on-boarding cum integration, succession planning, talent management and access to real time dashboards.

**9. Details of performance and career development reviews of employees and worker:**

Category	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Total (A)	No. (B)	% (B/A)	Total (A)	No. (B)	% (B/A)
	<b>Employees</b>					
Male	2065	2065	100	2211	2211	100
Female	319	319	100	241	241	100
<b>Total</b>	<b>2384</b>	<b>2384</b>	<b>100</b>	<b>2452</b>	<b>2452</b>	<b>100</b>
	<b>Workers</b>					
Male						
Female						Not applicable
<b>Total</b>						

**10. Health and safety management system:**

**a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, what is the coverage of such a system?**

Yes, Employees are key to the growth of any organization. Therefore, their health and wellbeing is also equally important.

- All the offices are provided with fire extinguishers and kept in working condition.
- At corporate office -
  - o Fire detection and firefighting system is in place integrated with the building management system.
  - o An emergency response team (ERT) has been formed to guide the employees in the panic situations if any.
  - o Fire evacuation drills are being conducted periodically. Training is also provided by external consultant/ party on how to deal with such scenarios.
  - o Public announcement (PA) system is in place for any emergency situations.
  - o Fire alarm systems are installed at the qualified branches as per norms.
  - o Creche and medical room facility are also available.
  - o Onsite Nursing and Physician consultation for employees.

**b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?**

Being non-banking financial company and considering the nature of business, this is not directly applicable to the Company.

**c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks.**

Not applicable

**d. Do the employees/ workers of the entity have access to non-occupational medical and healthcare services?**

Yes, all employees of the Company are covered under the company's health insurance policy. Employees and their families are covered for hospitalization through Medclaim cover and annual health check-up is also facilitated for employees. Further, first aid boxes and ambulances are also available for employees.

**11. Details of safety related incidents, in the following format:**

Safety Incident/Number	Category	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0	0
	Workers	Not Applicable	Not Applicable
Total recordable work-related injuries	Employees	0	0
	Workers	Not Applicable	Not Applicable
No. of fatalities	Employees	0	0
	Workers	Not Applicable	Not Applicable
High consequence work-related injury or ill-health (excluding fatalities)	Employees	0	0
	Workers	Not Applicable	Not Applicable

## 12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

Some key initiatives taken by the Company to prioritize employee wellness includes:

- Onsite Nursing and Physician consultation for employees.
- In the domain of health and wellness, your company conducted a wellness session on nutrition. Onsite Nutritionist for counselling at Corporate Office.
- Covering both health and wellness and engagement, your Company conducted indoor and outdoor activities like Cricket, Football, Chess and Carrom tournaments at regular intervals.
- Employees are regularly sensitized for doing regular health check-up by organizing free and subsidized onsite camps in partnering with Dr Lal Path, Doc Online.
- Conducted Free health checkup, Dental, Skin and Hair and eye checkup camps in partnering with Insurance broker and local hospital network.
- Workplace stress management sessions are conducted.
- Fun and Fitness activities are conducted.
- Conducted sessions on Parenting.
- Conducted the Ekal run half Marathon where the employee and their kids participated for the social cause to contribute towards the education of children from remote, rural & tribal education.
- Conducted the Fitisthan Marathon where the employee and their kids participated for the social cause to contribute towards the Indian Army.
- Guilt Free workshop conducted for healthy cooking.
- Employees are regularly sensitized to the hazards of smoking through our weekly communication.
- A special series of communication on 'Healthy eating habits' is sent on regular basis.
- Launched a BMI contest '#PFL FIT' for all employees.
- PFL launched 'EB360 – Employee Benefits 360', an initiative that offered multiple benefits to cater to the physical, mental, and financial health of employees. We partnered with renowned doctors to provide our employees with the benefit of having on-call assistance.

## 13. Number of complaints on the following made by employees and workers

	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	0	0	-	0	0	-
Health & Safety	0	0	-	0	0	-

## 14. Assessments for the year

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	We have not undertaken separate assessment by third party.
Working Conditions	

## 15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

Not applicable

## Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

Yes. The Company extends the Group Medical Coverage, Group Personal Accident Coverage and Group Term Insurance to all the permanent employees. The coverage for the employees varies according to the employee grade.

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

We communicate our expectation to our business partners and vendors through our service agreements which outlines the need to be in compliance with all relevant regulations.

3. Provide the number of employees / workers having suffered high consequence work related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Employees	0	0	0	0
Workers	Not applicable			

Note- Response to E11 is 0 and therefore this is not applicable

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

Yes. The Company has a retirement policy that honors the accomplishments and contributions of departing employees. The experience gained by the retiring employees in the different fields helps them in their post-retirement professional engagement. The Company also has an internal job policy to nurture the organization's multi-skilled resources.

5. Details on assessment of value chain partners:

	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety conditions	We have not undertaken an assessment of value-chain partners.
Working conditions	

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

Not applicable

## Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders.

### Essential Indicators

1. Describe the processes for identifying key stakeholder groups of the entity.

The various functional teams identify the stakeholder groups relevant to the work and discussions are conducted at senior management levels to include the groups. For example, across the value chain, some of the key stakeholders identified are customers, communities, NGO partners, suppliers and third parties etc.

**2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.**

<b>Stakeholder Group</b>	<b>Whether identified as Vulnerable &amp; Marginalized Group (Yes/No)</b>	<b>Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other</b>	<b>Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)</b>	<b>Purpose and scope of engagement including key topics and concerns raised during such engagement</b>
Government and regulatory authorities	No	<ul style="list-style-type: none"> <li>- Regulatory filings</li> <li>- Newspaper advertisements/publications for various regulatory matters.</li> <li>- Meetings</li> <li>- Letters</li> <li>- E-mails</li> </ul>	<ul style="list-style-type: none"> <li>- Quarterly</li> <li>- Need based</li> </ul>	<ul style="list-style-type: none"> <li>- Compliance with filing and other regulatory compliance.</li> <li>- Keep various regulatory authorities informed and up to date about the various developments going on in the organization to fulfill the compliance requirement.</li> </ul>
NGOs and local community	No	<ul style="list-style-type: none"> <li>- Meetings</li> <li>- Proposal and request for new CSR initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>- Need based</li> </ul>	<ul style="list-style-type: none"> <li>- Community development need, focus area viz., education, women empowerment, financial literacy and health care.</li> </ul>
Employees	Yes	<ul style="list-style-type: none"> <li>- Induction programs (Embark 2.0 (Including AI Connect))</li> <li>- E-mails (Internal Communications), Newsletter, Website, Notice Board</li> <li>- Rewards and recognition programs</li> <li>- People engagement initiatives</li> <li>- Synergy (Dept. Townhall),</li> <li>- Accelerate (Cross Functional Leadership Connect)</li> <li>- My Branch My Pride</li> </ul>	<ul style="list-style-type: none"> <li>- New joiner Day1 till 180 days of joining.</li> <li>- Quarterly</li> <li>- Half yearly</li> <li>- Need based</li> </ul>	<ul style="list-style-type: none"> <li>- It helps us in educating all our employees on various policies and procedures.</li> <li>- Keep our employees up to date on various initiatives of the organization</li> <li>- Training and career development of employee</li> <li>- The leadership connects helps building trust, prioritize transparency, integrity &amp; promote open communication.</li> </ul>
Customers	Not applicable	<ul style="list-style-type: none"> <li>- Call center</li> <li>- Customer grievance cell</li> <li>- Customer helpline</li> <li>- Customer satisfaction survey</li> <li>- Branch office</li> <li>- Smartphone</li> <li>- E-mail</li> <li>- Website</li> <li>- Social media channels</li> </ul>	<ul style="list-style-type: none"> <li>- Ongoing</li> <li>- Need based</li> </ul>	<ul style="list-style-type: none"> <li>- Needs of customer</li> <li>- Customer experience and service quality</li> <li>- New products and policies, any revision in existing policies/guidelines for products, queries &amp; services.</li> </ul>
Suppliers	Yes	<ul style="list-style-type: none"> <li>- E-mail,</li> <li>- Phone calls</li> <li>- Virtual meetings</li> <li>- One on one meetings</li> </ul>	<ul style="list-style-type: none"> <li>- Ongoing</li> <li>- Need based</li> </ul>	<ul style="list-style-type: none"> <li>- Contract, commercial and terms and condition.</li> </ul>
Investors	No	<ul style="list-style-type: none"> <li>- Website</li> <li>- Emails</li> <li>- Letters</li> <li>- Media</li> <li>- Meetings/ Investor Calls</li> <li>- Analyst Presentations</li> </ul>	<ul style="list-style-type: none"> <li>- Annual and Quarterly</li> <li>- Need based</li> </ul>	<ul style="list-style-type: none"> <li>- Financial Result</li> <li>- Providing relevant information, progress of the company, various initiatives, and roadmap.</li> </ul>

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders	No	- Website - E-mails - Letters - Newspaper publication - Shareholder meetings	- Annual and Quarterly - Need based	- Financial Result - Shareholders return and dividend - Key business development
Media	No	- Newspaper - Pamphlets - Social media channels - Website - Press Meet - Media Events - Management Interviews - Industry stories.	- Need based	- Latest developments and initiatives of the company about business expansion, financial results, leadership interviews, posts on social media regarding various products as well as occasions/festivals, media events and sponsorships, etc.

## Leadership Indicators

### 1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

The Company actively engages with stakeholders to enhance performance and create value for the ecosystem and its own operations. The methods of consultation vary depending on the stakeholder group.

For shareholders and investors, the Company utilizes earnings calls, conferences, quarterly meetings, annual general meetings, and grievance channels. While sustainability discussions have emerged recently, the focus remains on strategy and performance.

Customer consultations take place through surveys and social media, covering topics such as customer service, complaints, new products, community involvement, and more.

Employee engagement is a top priority, with various platforms and communication channels utilized. This includes addressing complaints and concerns, providing feedback and evaluations, sharing news through internal newsletters and emails, conducting town hall meetings, and organizing awareness programs. Feedback received is recorded as meeting minutes and discussed by function heads and senior management for possible implementation. For dissemination of organization-level information to the employees, the employee connect framework was modified. Through this the mechanism to connect the branch heads with the HR team, conduct townhalls with the Functional Heads were practiced. This process allowed the Company to acknowledge the challenges faced by the employees, provide resolutions and allows discussion with the senior members of the organization. As a forward looking step, the Company launched an initiative My Branch, My Pride through which the Senior leaders have been assigned select branches to ensure engagement with employees, understand their challenges and provide appropriate resolutions. This was also initiated to set an example of approachable leadership for the employees and ensuring the aspect of inclusiveness for all.

The business HR team conducts monthly consultation with the employees by focusing on open queries and putting efforts to resolve them. To further strengthen the employee connects, the Company has partnered with third party to provide an AI based platform through which the employees can stay connected.

The feedback received from the stakeholders is discussed and suitable actions were taken towards enhancing our practices.

**2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**

Yes, the engagement with communities and beneficiaries is mostly in the form of focused group discussions and their feedback on the CSR programs are considered and implemented as appropriate. We have instituted ESG policy that outline our commitment for each of the focus area identified by us.

The discussion of employees with HR and team leads has also helped the Company to incorporate activities such as employee wellbeing programs, taking cognizance of environmental initiatives (saving electricity, water etc.). We have instituted Equal Opportunity policy and other employee related policies and practices to promote a fair workplace.

**3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.**

To avoid spreading false information about the organization, whenever journalists or media outlets ask questions or have queries, the Company immediately reviews them and responds. The Company also engages with the media to keep stakeholders updated about the Company. The Company thinks that the unbanked and underbanked people in urban India are less likely to integrate into India's mainstream economy, which makes them vulnerable to socioeconomic exploitation. Through its CSR initiative, the Company aims to improve the lives of underprivileged individuals and all the CSR projects aims to address the concerns of marginalized stakeholder groups and promote society's holistic development. For further details on our CSR programmes please refer annual CSR report.

**Principle 5: Businesses should respect and promote human rights.**

**Essential Indicators**

**1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:**

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. of employees / workers covered (B)	% (B/A)	Total (A)	No. of employees / workers covered (B)	% (B/A)
<b>Employees</b>						
Permanent	2384	2384	100	2452	2452	100
Other than permanent			Not applicable			
<b>Total employees</b>	<b>2384</b>	<b>2384</b>	<b>100</b>	<b>2452</b>	<b>2452</b>	<b>100</b>
<b>Workers</b>						
Permanent						
Other than permanent			Not applicable			
<b>Total workers</b>						

**2. Details of minimum wages paid to employees and workers, in the following format**

Category	FY 2023-24					FY 2022-23				
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% E/D)	No. (F)	% (F/D)
<b>Employees</b>										
Permanent	2384	NA	NA	2384	100	2452	NA	NA	2452	100
Male	2065	NA	NA	2065	100	2211	NA	NA	2211	100
Female	319	NA	NA	319	100	241	NA	NA	241	100



Category	FY 2023-24				FY 2022-23					
	Total (A)	Equal to minimum wage		More than minimum wage		Total (D)	Equal to minimum wage		More than minimum wage	
		No. (B)	% (B/A)	No. (C)	% (C/A)		No. (E)	% E/D)	No. (F)	% (F/D)
Other than permanent										
Male										Not Applicable
Female										
										<b>Workers</b>
Permanent										
Male										
Female										Not Applicable
Other than permanent										
Male										
Female										

### 3. Details of remuneration/salary/wages, in the following format:

#### A. Median remuneration / wages:

	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category (₹ in Crore)	Number	Median remuneration/ salary/ wages of respective category (₹ in Crore)
Board of Directors (BoD)*	7	0.66	1	0.09
Key Managerial Personnel	3	4.97	1	0.75
Employees other than BoD and KMP	2063	0.09	317	0.07
Workers				Not applicable

\* The Company has four KMPs of which 2 are Directors.

#### b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

	FY 2023-24	FY 2022-23
Gross wages paid to females as % of total wages	8.92%	6.69%

#### 4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes. The Company has formed an Ethics and Disciplinary Committee which oversees every aspect of regulatory and employee disciplinary matters. The committee also oversees among other things, any allegations of human rights violations within the Company.

#### 5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

The Company has a defined 'Whistleblower' mechanism to ensure that any violations to its Code of Conduct and Code of Business Ethics (including violation of human rights) are raised in a systematic, fair manner and without any fear of consequence. Further, any other concerns or grievances on discrimination, harassment, unethical behavior or dealings can be reported by the employees in accordance with the process explained in Whistleblower Policy, human resource manual and the code of conduct.

The complaints of sexual harassment are dealt with by the Internal Committee ('IC'). Complainant may submit a complaint in writing and inform any IC member. In case of a complaint against any member of the IC, the complaint can be made to the IC and the alleged member would be replaced by another member appointed by the IC for the investigation period. Any of the IC members at the workplace must receive a detailed complaint from the complainant, along with any available documentary evidence or witness names.

The Ethics and Disciplinary Committee is the final authority to make decisions based on the Company's Code of Conduct and Discipline Rules in the event of a Protected Disclosure regarding disciplinary or workplace harassment concerns.

**6. Number of Complaints on the following made by employees and workers:**

	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	0	0		1	0	
Discrimination at workplace	0	0		0	0	
Child Labour	0	0		0	0	
Forced Labour/ Involuntary Labour	0	0		0	0	
Wages	0	0		0	0	
Other human rights related issues	0	0		0	0	

**7. Complaints filed under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:**

	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Total Complaints reported under Sexual Harassment of Women at Workplace (Prevention , Prohibition and Redressal )Act, 2013 (POSH)	0	1
Complaints on POSH as a % of female employees/workers	0	Not measurable
Complaints on POSH upheld	0	1

**8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.**

A formal grievance mechanism is available to all employees to report or raise their concerns confidentially and anonymously, without fear of retaliation.

**9. Do human rights requirements form part of your business agreements and contracts? (Yes/No)**

Yes, vendor contracts and agreements include clauses with respect to compliance of labour laws by the Service Provider towards its employees.

**10. Assessments of the year**

	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	
Forced/involuntary labour	
Sexual harassment	Being a non-banking financial company, we undertake proactive measures to safeguard human rights, we have however not undertaken a dedicated human rights assessment.
Discrimination at workplace	
Wages	
Others – please specify	

**11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.**

Not applicable

**Leadership Indicators**

**1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.**

We respect the human rights of all our stakeholders and ensure adherence with applicable laws. There have not been any significant complaints or grievances regarding human rights that merit the addition or modification of business procedures.

**2. Details of the scope and coverage of any Human rights due diligence conducted.**

We have not conducted any human rights due diligence.

**3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?**

Yes, the Company welcomes differently abled visitors and makes no discrimination in their reception. To ensure the differently abled visitors also feel safe and comfortable, the corporate office is made accessible by providing ramps for wheelchairs. Additionally, separate washroom, Braille enabled, and voice assisted elevators are also provided for easy access. The Company may also have differently abled employees in the near future and therefore infrastructure has been designed accordingly.

**4. Details on assessment of value chain partners:**

	% of value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	
Discrimination at workplace	
Child labour	We have not undertaken assessment of value chain partner
Forced/involuntary labour	
Wages	
Others – please specify	

**5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.**

Not applicable

**Principle 6: Businesses should respect and make efforts to protect and restore the environment.**

**Essential Indicators**

**1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

Parameter	FY 2023-24 (Current Financial Year)*	FY 2022-23 (Previous Financial Year)*
<b>From Renewable Sources</b>		
Total electricity consumption (A)	-	-
Total fuel consumption (B)	-	-
Energy consumption through other sources (C)	-	-
<b>Total energy consumed from Renewable Sources (A+B+C)</b>	-	-
<b>From Non-Renewable Sources</b>		
Total electricity consumption (D)	5555.61 GJ	4381 GJ
Total fuel consumption (E)	19.44 GJ	44.7 GJ
Energy consumption through other sources (F)		
<b>Total energy consumed from Non-Renewable Sources (D+E+F)</b>	5575.05 GJ	4425.7 GJ
<b>Total energy consumed (A+B+C+D+E+F)</b>	5575.05 GJ	4425.7 GJ
Energy intensity per rupee of turnover <b>adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed/ Revenue from Operations )	1.77 GJ/ INR Cr	2.20 GJ/ INR
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/Revenue from Operations adjusted for PPP)	39.62 GJ/ USD	49.32 GJ/ USD
Energy intensity in terms of physical output	-	-
Energy intensity (optional) – the relevant metric may be selected by the entity	-	-

\*Data for corporate office has only been considered.

Intensity data for FY2023 has been updated as revised method of calculation.

For PPP, 22.4 National currency units/US dollar has been used. Source: IMF (2024), Purchasing power parities (PPP) (indicator). (Accessed on May 29, 2024)

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

We have not undertaken independent assessment.

**2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.**

This is not applicable to us as we do not have sites or facilities identified as designated consumers.

**3. Provide details of the following disclosures related to water, in the following format:**

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	-	-
(ii) Groundwater	10,046.05	-
(iii) Third party water (Municipal water supplies)	5,221.37	-
(iv) Seawater / desalinated water	-	-
(v) Others	215.94	-
<b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>	15,483.36	-
<b>Total volume of water consumption (in kilolitres)</b>	15,483.36	-
<b>Water intensity per rupee of turnover</b> (Total Water consumption / Revenue from Operations)	4.91 KL/ INR Cr	-
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Water consumption / Revenue from Operations adjusted for PPP)	110.04 KL/ USD Cr	-
<b>Water Intensity in terms of physical output</b>	-	-
<b>Water intensity (optional)</b> – the relevant metric may be selected by the entity	-	-

For PPP, 22.4 National currency units/US dollar has been used. Source: IMF (2024), Purchasing power parities (PPP) (indicator). (Accessed on May 29, 2024)

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Even though the nature of business—being a non-banking financial company has little effect on the environment, the company constantly strives to reduce its environmental impact by figuring out how to maximize resource consumption in its operations. Additionally, the water is only used for basic consumption and there is currently no system in place to track it.

**4. Provide the following details related to water discharged**

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface Water		
-No treatment	-	-
-With treatment – please specify level of treatment	-	-
(ii) To Groundwater		
-No treatment	-	-
-With treatment – please specify level of treatment	-	-
(iii) To seawater		
-No treatment	-	-
-With treatment – please specify level of treatment	-	-

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
(iv) Sent to third parties		
-No treatment	-	-
-With treatment-please specify level of treatment	-	-
(v) Others		
-No treatment	-	-
-With treatment-please specify level of treatment	-	-
<b>Total Water discharged (in kilolitres)</b>	-	-

**Note: Indicate if any independent assessment /evaluation/assurance has been carried out by an external agency (Y/N) If yes , name of the external agency.**

Not applicable.

**5. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.**

We do not have a mechanism for zero liquid discharge.

**6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:**

Parameter	Please specify unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
NOx	-		
SOx	-		
Particulate matter (PM)	-		
Persistent organic pollutants (POP)	-	Not applicable	Not applicable
Volatile organic compounds (VOC)	-		
Hazardous air pollutants (HAP)	-		
Others – Ozone Depleting Substances (HCFC - 22 or R-22)	-		

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Not applicable

**7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:**

Parameter	Unit	FY 2023-24 (Current Financial Year)*	FY 2022-23 (Previous Financial Year)*
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub>	14.73	0.14
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	tCO <sub>2</sub>	1251.93	961
<b>Total Scope 1 and Scope 2 emissions intensity per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG Emissions /Revenue from Operations)	tCO <sub>2</sub> /INR	0.40	0.47
<b>Total Scope 1 and Scope 2 emissions intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG Emissions /Revenue from Operations adjusted for PPP)	tCO <sub>2</sub> /USD	9.00	10.71
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	-	-	-
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity	-	-	-

\*Data for corporate office has only been considered

For PPP, 22.4 National currency units/US dollar has been used. Source: IMF (2024), Purchasing power parities (PPP) (indicator). (Accessed on May 29, 2024)

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

We have not undertaken any independent assessment.

**8. Does the entity have any project related to reducing GreenHouse Gas emission? If Yes, then provide details.**

Yes

The Company has taken the following initiatives to reduce the greenhouse gas emissions:

- Awareness generation among the employees to conserve and responsibly use electricity.
- Reduction of usage of energy (through installation of LED bulbs, energy efficient electrical equipment and retrofitting LED lights in branch offices.)
- E-waste management and handling, distribution of sapling and paper conservation (e.g. both side printing, re-use of papers, PIN based controlled printing) and paper waste recycling.
- The corporate office is in a Platinum certified green building.
- The Company has managed all the electrical equipment in a manner so that they help to conserve energy. The Company has initiated installation of LED lights in new and upcoming branches wherever possible. The Company is also in the process of replacing existing lights with LED lights in a phased manner.
- Energy consumption would reduce as a result of these initiatives, either directly or indirectly. Energy conservation would significantly contribute to the mitigation of global warming in our nation due to the predominant use of fossil fuels for energy production, which results in greenhouse gas emissions and climate change.

**9. Provide details related to waste management by the entity, in the following format:**

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste <b>(A)</b>	0.147	-
E-waste <b>(B)</b>	3.615	21.0
Bio-medical waste <b>(C)</b>	0.651	-
Construction and demolition waste <b>(D)</b>	-	-
Battery waste <b>(E)</b>	-	-
Radioactive waste <b>(F)</b>	-	-
Other Hazardous waste. Please specify, if any. <b>(G)</b>	-	-
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	0.627	-
Total (A+B + C + D + E + F + G + H)	5.04 MT	21.0 MT
<b>Waste intensity per rupee of turnover</b> (Total waste generated / Revenue from operations)	0.02 MT/ INR Cr	0.01 MT/ INR Cr
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Revenue from operations adjusted for PPP)	0.03 MT/ USD	0.23 MT/ USD
<b>Waste intensity in terms of physical output</b>	-	-
<b>Waste intensity</b> (optional) – the relevant metric may be selected by the entity	-	-

For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	-	-
(ii) Re-used	0.396	-
(iii) Other recovery operations	-	-
<b>Total</b>	<b>0.396</b>	<b>-</b>
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	0.651	-
(ii) Landfilling	-	-
(iii) Other disposal operations	3.993	-
<b>Total</b>	<b>4.644</b>	<b>-</b>

For PPP, 22.4 National currency units/US dollar has been used. Source: IMF (2024), Purchasing power parities (PPP) (indicator). (Accessed on May 29, 2024)

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

We have not undertaken independent assessment, being a non-banking financial company and considering the nature of business, this has little effect on the environment, the Company constantly strives to reduce its environmental impact by reducing waste.

**10. Briefly describe the waste management practices adopted in your establishments.**

**Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.**

Paper and e waste are the predominant categories of waste generated from the operations of the Company and the Company has adopted various management practices to ensure the quantum of waste generated is reduced gradually and awareness is also created within the organization to manage the wastes in an efficient manner.

**Paper Waste:** The Company has reduced the use of paper by optimizing its processes through digital technologies and process excellence. Because of the nature of its services, the major resource consumed at the Company is paper. The Company contributes towards sustainable service delivery through paperless transaction. The Company has a paper recycling initiative in terms of re-usage of old printouts which are no longer required and also monitor consumption of paper. Above all, the Company accepts payments through ACH/Auto Debit/Digital/online mode which in turn helps the customers in paper less transaction. All payments to vendors are through NEFT/RTGS mode thereby reducing the usage of paper. The Company ensures reduction of paper usage through various initiatives viz. leads are generated online with customer related data, online system to record customer related transactions, e-learning platform for knowledge sharing / enhancement of employees, customers are updated through SMS during loan processing at every stage till sanction. Other important initiatives launched in previous year is discontinuation of printing of system generated reports and facility for uploading system generated reports which helped in restricting usages of paper, ink cartridges, fuel for transportation. Business units are working towards paper-less processing of loan files and avoid taking paper printouts as much as possible. We are promoting storage of documents digitally. The Company is conscious about usage of paper and saving trees. Statements & Reports, Welcome Letter, Statement of Account, Foreclosure, No Objection Certificate etc. is primarily sent to customers via e-mail. Loan details and related information is provided to customers via email / Inbound Call, Regular proactive communication through SMS, Whatsapp and email.

**E waste:** The Company has put in place mechanisms for responsible disposal of waste through authorized third-party vendors. The Company has in place a policy and process for disposal of E-Waste Items. Further, the device management policy of the Company helps to monitor and repair devices as required.

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

S. No.	Location of operations/offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
We do not have any operations/offices in/around ecologically sensitive areas.			

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
We did not undertake any project that required EIA.					

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format: Yes

S. No.	Specify the law / regulation / guidelines which was not complied with	Provide details of the non compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
We are in compliances with the current set of guidelines established by the government.				

### Leadership Indicators

1) Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

For each facility / plant located in areas of water stress, provide the following information:

(i) **Name of the area:** Not applicable

(ii) **Nature of operations:** Not applicable

(iii) **Water withdrawal, consumption and discharge in the following format:** As we are a non-banking financial company, this is not applicable to our activities.

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	Not applicable	Not applicable
(ii) Groundwater		
(iii) Third party water		
(iv) Seawater / desalinated water		
(v) Others		
<b>Total volume of water withdrawal (in kilolitres)</b>		
<b>Total volume of water consumption (in kilolitres)</b>		
<b>Water intensity per rupee of turnover</b> (Water consumed / turnover)		
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity		



Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) Into Surface water	Not applicable	Not applicable
- No treatment		
- With treatment – please specify level of treatment		
(ii) Into Groundwater		
- No treatment		
- With treatment – please specify level of treatment		
(iii) Into Seawater		
- No treatment		
- With treatment – please specify level of treatment		
(iv) Sent to third-parties		
- No treatment		
- With treatment – please specify level of treatment		
(v) Others		
- No treatment		
- With treatment – please specify level of treatment		
<b>Total water discharged (in kilolitres)</b>		

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Not Applicable

**2. Please provide details of total Scope 3 emissions & its intensity, in the following format:**

Parameter	Unit	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)			
<b>Total Scope 3 emissions per rupee of turnover</b>		-	
<b>Total Scope 3 emission intensity</b> (optional) – the relevant metric may be selected by the entity			

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

We have not undertaken Independent assessment.

**3. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.**

Not applicable

**4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:**

S. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1.	Installation of LED bulbs, energy efficient electrical equipment and also retrofitting LED lights in branch offices	Please refer point no. 8 of Principle 6	This has reduced electricity consumption of the Company

**5. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.**

Yes. The Company has implemented a comprehensive Business Continuity Management System (BCMS) as outlined in its Business Continuity Management Policy. This system ensures the recovery of critical business processes and services in the event of disruptions that may impact stakeholders and customers. Contingency measures have been established to protect essential resources such as people, technical infrastructure, facilities, and vital records.

The BCMS Policy governs the Company's emergency response, resumption, recovery, and restoration procedures during a disaster. It outlines the overall Business Continuity practice, including individual and functional responsibilities necessary to ensure business continuity and minimize financial and non-financial impacts in the event of a critical service disruption.

The BCMS at the Company covers departments located at the corporate office, Branch Locations. Business Continuity for Infrastructure-as-a-Service (IaaS) / Software-as-a-Service (SaaS) Applications / Platform-as-a-Service (PaaS) is managed either by the IaaS / SaaS / PaaS Vendor or as per contractual agreements. Critical application identification and annual testing for Business Continuity are conducted to maintain the effectiveness of the BCMS.

**6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.**

Not applicable

**7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.**

Not applicable

**PRINCIPLE 7 Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.**

**Essential Indicators**

- 1. a. Number of affiliations with trade and industry chambers/ associations-4**
- b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such a body) the entity is a member of/ affiliated to.**

S. No.	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	The Associated Chambers of Commerce & Industry of India	National
2	Confederation of Indian Industry (CII)	National
3	Finance Industry Development Council (FIDC)	National
4	The Federation of Indian Chambers of Commerce and Industry (FICCI)	National

**2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.**

Name of authority	Brief of the case	Corrective action taken
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There have been no action or issues related to anti-competitive conduct and no adverse orders from any authority during the FY 2023-24.

## Leadership Indicators

### 1. Details of public policy positions advocated by the entity:

S. No.	Public policy advocated	Method resorted for such advocacy	Whether information available in the public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
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The Company has taken annual membership of FICCI, FIDC, CII and ASSOCHAM but has not been associated in formulating any such policies, strategies, etc. at any level. PFL as NBFC may have given its comments or recommendations on certain draft policies, circulars, etc. as and when asked by RBI from all NBFCs wherever applicable.

## PRINCIPLE 8 Businesses should promote inclusive growth and equitable development

### Essential Indicators

#### 1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Currently, the same is not applicable					

#### 2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In INR)
The company has not undertaken which requires Rehabilitation and Resettlement (R&R)						

#### 3. Describe the mechanisms to receive and redress grievances of the community.

The Company is dedicated to making a positive impact through its Corporate Social Responsibility (CSR) initiatives. These initiatives are focused on improving the lives of underprivileged individuals and fostering their overall well-being. To ensure effective implementation, the Company's CSR team actively engages with communities, an important stakeholder group. This engagement serves as a platform for open communication, allowing the team to understand the concerns and gather feedback from the community. This feedback helps in shaping and refining the projects that address social and environmental issues, ensuring their relevance and effectiveness in creating a meaningful impact.

#### 4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Directly sourced from MSMEs/ small producers	24.46%	4.85%
Sourced directly from within the district and neighboring districts	99.73%	99.71%

#### 5. Job Locations in small towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent /on contractual basis) in following locations, as % of total wages cost.

Location	FY 2023-24 Current Financial Year	FY 2022-23 Previous Financial Year
Rural	-	-
Semi-Urban	4.46%	6.70%
Urban	16.81%	25.67%
Metropolitan	78.72%	67.63%

(Place to be categorized as per RBI Classification System - rural / semi-urban / urban / metropolitan)

## Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
Nil	Nil

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:

S. No.	State	Aspirational District*	Amount spent (in lakh)
1.	Maharashtra	-	200.00
2.	Maharashtra	-	154.00
3.	Jharkhand and Chhattisgarh	-	40.00
4.	Sikkim and Haryana	-	30.00
5.	Bihar and Jharkhand	-	30.00
6.	Andhra Pradesh, Bihar, Gujarat, Haryana, Jharkhand, Karnataka, Kerala, Madhya Pradesh, Maharashtra, Odisha, Punjab, Rajasthan, Tamil Nadu, Telangana, Uttar Pradesh, West Bengal	Birbhum, Kadapa, Gaya, Karauli, Khammam, Murshidabad, Muzzaffarpur, Nawada, Purbi Singhbhum, Rajgarh, Visakhapatnam	48.0 (out of this Rs 5.37 lakh expenses is towards aspirational district)

\* The CSR projects are state level and PAN India project and not categorized as per Aspirational District

3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

Being a non-banking financial company, we do not require substantial input material for our business.

- (b) From which marginalized /vulnerable groups do you procure?

Not applicable

- (c) What percentage of total procurement (by value) does it constitute?

Not applicable

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes / No)	Basis of calculating benefit share
				Not applicable

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Name of authority	Brief of the Case	Corrective action taken
		Not applicable

6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefited from CSR Projects	% of beneficiaries from vulnerable and marginalized groups
1.	Project M-Scholars Scholarship to students	647	100%
2.	Creative Foundation	25,000 <sup>#</sup>	
3.	Pahle India Foundation	-	100%
4.	Grant Medical Foundation	-	

<sup>#</sup> Students

**PRINCIPLE 9 Businesses should engage with and provide value to their consumers in a responsible manner**

**Essential Indicators**

**a) Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

We have in place a grievance redressal policy consisting of robust customer grievance redressal mechanism. The Company employs various strategies to effectively address customer complaints and enhance their satisfaction:

**Efficient Processes:** By leveraging data analytics and technology-driven solutions, the Company streamlines complaint resolution processes. It focuses on resolving complaints within agreed Service Level Agreements (SLAs), classifying them based on case type and subtype. This ensures timely and targeted actions for effective resolution.

**Continuous Improvement:** The Company conducts regular forums, such as the Complaints RCA Forum, to identify and address key process gaps. It proactively monitors call quality, conducts repeat call analysis, and empowers frontline teams to efficiently handle customer requirements. Through rigorous training programs, the Company ensures high service quality standards and promotes a proactive approach to identify and resolve potential escalations or grievances.

**Enhancing Customer Experience:** The Company is committed to delivering a differentiated customer experience by implementing the following measures:

**Digital Engagement:** Leveraging digital channels, the Company proactively connects with customers throughout their lifecycle journey. Approximately 75% of customer queries and requests are serviced digitally, allowing for swift and smooth resolution of concerns. This digital connect helps in timely communication and enhances overall customer experience.

**Robust Internal Systems:** The Company continuously enhances its internal systems through system upgrades, process re-engineering to ensure a competitive edge and provides seamless Experience to customers. The implementation of a Fair Practice Code facilitates setting of proper guardrails to ensure fair lending practices giving proper and enhanced visibility to end customers from loan initiation till closure, further building consumer trust on the brand.

**2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:**

	<b>As a percentage to total turnover</b>
Environmental and social parameters relevant to the product	-
Safe and responsible usage	-
Recycling and/or safe disposal	Not applicable

**3. Number of consumer complaints in respect of the following:**

	<b>FY 2023-24 (Current Financial Year)</b>		<b>Remarks</b>	<b>FY 2022-23 (Previous Financial Year)</b>		<b>Remarks</b>
	<b>Received during the year</b>	<b>Pending resolution at end of year</b>		<b>Received during the year</b>	<b>Pending resolution at end of year</b>	
Data privacy	-	-	-	-	-	-
Advertising	-	-	-	-	-	-
Cyber-security	-	-	-	-	-	-
Delivery of essential services	-	-	-	-	-	-
Restrictive Trade Practices	-	-	-	-	-	-
Unfair Trade Practices	-	-	-	-	-	-
Other	-	-	-	-	-	-

The complaint categories are predefined internally and we currently do not have specific categories for advertising, Restrictive Trade Practices and Unfair Trade Practices. The total number of all customer complaints is mentioned under section A of the BRSR disclosure.

**4. Details of instances of product recalls on account of safety issues:**

	Number	Reasons for recall
Voluntary recalls		
Forced recalls		Not applicable

**5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.**

Yes, the Company has a board approved Cyber Security Policy in place at organization level. The Company also has a [Privacy policy](#), Information Security Policy, IT Management Policy, Information & IT Risk Management Policy, and Cloud Adoption Policy.

Consumer Awareness - Cyber Threats and Frauds

**6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.**

Not applicable, no breaches reported during the year under review.

**7. Provide the following information relating to data breaches:**

- a. Number of instances of data breaches: 0
- b. Percentage of data breaches involving personally identifiable information of customers: 0
- c. Impact if any of the data breaches: Not applicable

**Leadership Indicators**

**1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).**

Poonawalla Fincorp is an omnipresent financial organization which allows both current and prospects to interact, do business, and receive services from online and offline mode. In the online mode the products and services are available through the website([www.poonawallafincorp.com](http://www.poonawallafincorp.com)) and in offline world through our branch network. Apart from these various other channels which are available for finding information about our products and services are Toll Free contact center, chatbot services on the website, WhatsApp and e-mail channel.

These platforms can be used to apply for loan products, request for services or raise queries. The digital channels make the services accessible 24\*7 and provides instant response to the customers.

The products and services of the Company can be accessed [here](#).

**2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.**

The important terms and conditions provides extensive information and ensures transparency on lending products. Further the [customer education webpage](#) on the Company website also provides information related to special mention accounts (SMA)/non performing asset (NPA) as prescribed by the regulations. The Blogs page and [Fraud Awareness page](#) on the website is a major step taken by the Company to educate the customers about the meaning and definitions of various financial terms in simple language. Such [Blogs](#) are published under the various category of products and services that are offered by the Company so that it also becomes relatable to the customers.

**3 Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.**

Customers are notified via SMS in advance of planned maintenance tasks. Customers are notified via text message in the event of an unanticipated disruption, and all the offices are also informed via an internal mechanism that directs customers who approach the offices.

**4 Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief.**

Not applicable

**Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

Yes

The NPS score serves as a reliable measure of customer loyalty. This survey is conducted monthly by the Company.

Customer feedback is obtained at four crucial touchpoints: sales, onboarding, service, and exit. The results of the NPS survey guides to enhance the customer experience through process reengineering. Additionally, customer demand is assessed to develop personalized offers for clients with a strong payment history, using algorithm-based approaches.

For and on behalf of the Board

**Abhay Bhutada**

Managing Director  
DIN: 03330542

Pune  
April 29, 2024

**Sunil Samdani**

Executive Director  
DIN: 10301175

Pune  
April 29, 2024