



August 21, 2024

**BSE Limited**

Department of Corporate Services,  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai – 400 001

**National Stock Exchange of India Limited**

The Listing Department,  
Exchange Plaza,  
Bandra Kurla Complex,  
Mumbai – 400 051

Scrip Code: 543396

Symbol: PAYTM

**Sub: Disclosure under Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015) - Business Responsibility and Sustainability Report for the financial year 2023-24**

Dear Sir / Ma'am,

Pursuant to Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith the Business Responsibility and Sustainability Report of the Company for the financial year 2023-24 which also forms part of the Annual Report for the financial year 2023-24.

This disclosure will also be hosted on the Company's website viz. <https://ir.paytm.com/>.

Kindly take the same on record.

Thanking you

Yours faithfully,

**For One 97 Communications Limited**

**Sunil Kumar Bansal**  
**Company Secretary & Compliance Officer**

*Encl.: As above*

# Business Responsibility & Sustainability Reporting

## SECTION A: GENERAL DISCLOSURES

### I. Details of the Company

1	Corporate Identity Number (CIN)	L72200DL2000PLC108985
2	Name	One 97 Communications Limited
3	Year of incorporation	2000
4	Registered office address	First Floor, Devika Tower, Nehru Place, New Delhi – 110019, India
5	Corporate address	One Skymark, Tower D, Plot No. H-10B, Sector-98, Noida-201304, Uttar pradesh, India
6	E-mail	<a href="mailto:compliance.officer@paytm.com">compliance.officer@paytm.com</a>
7	Telephone	+91-120- 4770770
8	Website	<a href="http://www.paytm.com">www.paytm.com</a>
9	Financial year for which reporting is being done	FY 2023-24
10	Name of the Stock Exchange(s) where shares are listed	The Equity shares of the Company are listed and traded on National Stock Exchange of India Limited and Bombay Stock Exchange Limited.
11	Paid-up Capital	₹ 635,413,773
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Sunil Kumar Bansal Company Secretary and Compliance Officer Telephone Number: +91 120 4770770 Email: <a href="mailto:compliance.officer@paytm.com">compliance.officer@paytm.com</a>
13	Reporting boundary - 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).	Standalone
14	Name of assurance provider	TUV India Private Limited
15	Type of assurance obtained	Limited

### II. Products/services

S. No	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Payment and financial services	<b>Payment services</b> for consumers and merchants, which enables them to send and receive payments both online and in-store. <b>Financial Services</b> include mobile credit, insurance, and mutual funds distribution and equity broking for consumers and merchants.	81
2	Marketing Services	<b>Marketing services</b> include ticketing for travel and entertainment, deals and gift vouchers. It also includes advertising, credit card distribution and loyalty programs for merchants.	19

## 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	Key services offered by the Company include digital recharge, bill payments such as utility bills, education and money transfers on the app, online payment gateways as well as offline payment modes to merchants either through QR codes, Soundbox or Card Machines. Apart from this, the Company also offers digital distribution of credit, insurance, mutual funds distribution and equity broking. Other services include ticketing, deals and gift vouchers, advertising services and loyalty programs for merchants as well as distribution of credit cards.	63999	100

## 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 <sup>#</sup>	0	70	70
International <sup>*</sup>	0	14	14

\*Note: International locations represent the number of registered offices of the subsidiaries of the Company.

<sup>#</sup>Note: National locations represent registered office, along with fleet hubs and regional offices.

### 19. Markets served by the entity:

#### a. Number of locations

Locations	Number
National (No. of States)	The company provides services in all state in India
International (No. of Countries)*	16

\*Note: International locations in terms of market served represent the number of countries with recorded revenue from an export service provided for the fiscal year 2023-24, either by the Company, or by its subsidiaries.

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

Less than 1%

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

The Company offers payments, marketing services and financial services to over 9.6 Crore transacting users (average of last three months ended March'2024) every month who benefit from our aforesaid diverse range of services. These services are available on a pan India basis to individuals spanning across various age groups. The offerings by the Company cater to a wide spectrum of customer requirements, facilitating seamless money transfers, merchant payments, bill payments, e-commerce transactions including on-line payments, and access to a variety of other financial services.

Our merchant network has grown significantly, reaching 4.06 Crore merchants (as of March 2024). Large and medium-sized merchants leverage features like payment gateway, POS machines and loyalty programs to enhance overall customer experience. Simultaneously, the Company actively empowers millions of small merchants by offering payment acceptance via products such as Paytm QR and Soundbox.

## IV. Employees

### 20. Details as at the end of Financial Year 2023-24

#### 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)*	28,107	26,504	94.30	1,603	5.70
2.	Other than Permanent (E)^	NIL	NIL	NIL	NIL	NIL
3.	Total employees (D + E)	28,107	26,504	94.30	1,603	5.70
<b>WORKERS</b>						
4.	Permanent (F)	NIL	NIL	NIL	NIL	NIL
5.	Other than Permanent (G)	NIL	NIL	NIL	NIL	NIL
6.	Total workers (F + G)	NIL	NIL	NIL	NIL	NIL

\*Permanent Employees include Full Time Managerial Grade (MG) and Sales Grade (SG) employees

^As our Paytm Services Agent Consultants (CG) are not on Company payrolls and paid out as Business Consulting payout. Hence, they have not been included.

Note: Higher ratio of male employees is reflective of majority of employees being in field sales which has a higher ratio of male employees.

Paytm has also focused on diversity hiring at Senior Leadership level (VP & above) and has increased the female count by 78% in FY24 from FY23. As compared to FY23, the total headcount has increased by 8.3% in FY24.

Definition according to SEBI Guideline on BRSR Page 3: ([https://www.sebi.gov.in/sebi\\_data/commndocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure2\\_p.PDF](https://www.sebi.gov.in/sebi_data/commndocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure2_p.PDF))

#### 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)#	9	9	100	NIL	NIL
2.	Other than Permanent (E)	NIL	NIL	NIL	NIL	NIL
3.	Total differently abled employees (D + E)#	9	9	100	NIL	NIL
<b>DIFFERENTLY ABLED WORKERS</b>						
4.	Permanent (F)	NIL	NIL	NIL	NIL	NIL
5.	Other than permanent (G)	NIL	NIL	NIL	NIL	NIL
6.	Total differently abled workers (F + G)	NIL	NIL	NIL	NIL	NIL

# **Note:** The data presented above includes the individuals who have self-identified as disabled and have provided their disability certificates as verification.

## 21. Participation/Inclusion/Representation of women

	Total (A)	No. and Percentage of females	
		No. (B)	% (B / A)
Board of Directors *	7	1	14.29
Key Management Personnel ^	3	0	0

\* Board of Directors - Mr. Vijay Shekhar Sharma, Mr. Ravi Chandra Adusumalli, #Mr. Neeraj Arora, Mr. Madhur Deora, Mr. Ashit Ranjit Lilani, Mrs. Pallavi Shardul Shroff and Mr. Gopalamudram Srinivasaraghavan Sundararajan.

^Key Management Personnel - Mr. Vijay Shekhar Sharma, Mr. Madhur Deora and Mr. Sunil Kumar Bansal.

#Mr. Neeraj Arora, Non-Executive Independent Director of the Company tendered his resignation w.e.f. June 17, 2024 on account of pre-occupation and other personal commitments. Mr. Rajeev Krishnamuralilal Agarwal has been appointed as a Non-Executive Independent Director of the Company w.e.f. June 17, 2024 for a term of five (5) consecutive years, subject to the approval of the Members of the Company.

## 22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year			FY 2021-22 Prior Financial Year		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	86.30%	37.93%	82.58%	67.70%	35.34%	64.59%	35.84%	46.55%	37.46%
Permanent Workers	NIL								

**Note:** Turnover rate for Permanent Employees includes all confirmed employees including field sales team on our rolls. Entity transfers from the Company to other group entities are not included in attrition. Employees on probation are not included.

Field sales teams that comprise majority of our confirmed employee base generally has a higher turnover ratio. The overall increase in turnover ratio is primarily on account of increase in contribution of field sales team to the overall confirmed man power in FY 23-24 along with a slight increase in turnover rate of the field sales team. Turnover rate of non-field sales teams is at 33.90% (compared to 32.26% in FY 22-23).

## 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 the Company	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the Company? (Yes/No)
1	One 97 Communications India Limited	Subsidiary	100.00	No
2	Wasteland Entertainment Private Limited	Subsidiary	100.00	No
3	Mobiquest Mobile Technologies Private Limited ('MQ') (refer note (i) and (v) below)	Subsidiary	82.49	No
4	Urja Money Private Limited ('Urja') (refer note (iv) below)	Subsidiary	83.34	No
5	Little Internet Private Limited ('Little')	Subsidiary	62.53	No
6	Paytm Entertainment Limited	Subsidiary	100.00	No
7	Paytm Money Limited	Subsidiary	100.00	No

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by the Company	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the Company? (Yes/No)
8	Orbgen Technologies Private Limited	Subsidiary	100.00	No
9	Paytm Services Private Limited	Subsidiary	100.00	No
10	Paytm Payments Services Limited	Subsidiary	100.00	No
11	Paytm Insurance Broking Private Limited	Subsidiary	100.00	No
12	One 97 Communications Nigeria Limited	Subsidiary	100.00	No
13	One 97 Communications FZ-LLC	Subsidiary	100.00	No
14	One 97 Communications Singapore Private Limited ('OCSPL') (refer note (vi) below)	Subsidiary	100.00	No
15	One 97 USA Inc.	Subsidiary	100.00	No
16	One 97 Communications Rwanda Private Limited (subsidiary of OCSPL)	Subsidiary	100.00	No
17	One 97 Communications Tanzania Private Limited (subsidiary of OCSPL)	Subsidiary	100.00	No
18	One 97 Communications Bangladesh Private Limited (subsidiary of OCSPL)	Subsidiary	70.00	No
19	One 97 Uganda Limited (subsidiary of OCSPL)	Subsidiary	100.00	No
20	One 97 Ivory Coast SA (subsidiary of OCSPL)	Subsidiary	100.00	No
21	One 97 Benin SA (subsidiary of OCSPL)	Subsidiary	100.00	No
22	Paytm Labs Inc. (subsidiary of OCSPL)	Subsidiary	100.00	No
23	One97 Communications Malaysia Sdn. Bhd. (subsidiary of OCSPL)	Subsidiary	100.00	No
24	One Nine Seven Communication Nepal Private Limited (subsidiary of OCSPL)	Subsidiary	100.00	No
25	One Nine Seven Digital Solutions Limited (subsidiary of OCSPL)	Subsidiary	100.00	No
26	One Nine Seven Communications Saudi Arabia For Communication and Information Technology (subsidiary of OCSPL)	Subsidiary	100.00	No
27	Xceed IT Solutions Private Limited (subsidiary of MQ)	Subsidiary	82.49	No
28	Fincollect Services Private Limited (subsidiary of Urja)	Subsidiary	83.34	No
29	Nearbuy India Private Limited (subsidiary of Little)	Subsidiary	62.53	No
30	Paytm Payments Bank Limited (refer note (ii) below)	Associates	49.00	No
31	Paytm Insuretech Private Limited (Formerly known as QoRQL Private Limited)	Associates	32.45	No
32	Paytm General Insurance Limited	Associates	49.00	No
33	Paytm Life Insurance Limited	Associates	49.00	No
34	Paytm Financial Services Limited ('PFSL')	Associates	48.78	No

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by the Company	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the Company? (Yes/No)
35	Foster Payment Networks Private Limited (subsidiary of PFSL) (refer note (vii) below)	Associates	48.80	No
36	Admirable Software Limited (subsidiary of PFSL)	Associates	48.78	No
37	Infinity Transoft Solution Private Limited (refer note (i) below)	Associates	26.19	No
38	Eatgood Technologies Private Limited (refer note (i) below)	Associates	23.24	No
39	Socomo Technologies Private Limited (refer note (i) below)	Associates	12.70	No
40	First Games Technology Private Limited (formerly known as Paytm First Games Private Limited) ('FG') (refer note (iii) below)	Joint Venture	55.00	No
41	First Games Singapore Pte. Ltd. (formerly known as Paytm First Games Singapore Pte. Ltd.) (wholly owned subsidiary of FG)	Joint Venture	55.00	No
42	Bluefield Technology Beijing Co. Ltd. (formerly known as Paytm Technology Beijing Co. Ltd.) (wholly owned subsidiary of FG)	Joint Venture	55.00	No

## Notes:

- (i) The entities have issued preference shares as well to the Holding Company.
- (ii) Including 10% (March 31, 2023: 10%) held through One 97 Communications India Limited. As per Banking Regulation Act, 1949, voting rights in a banking Company are capped at 26% in case the investor holds more than 26% in the bank.
- (iii) The entity is into the business of online gaming. It is a strategic investment which utilises the group's knowledge and expertise in online space.
- (iv) Including 15.87% (March 31, 2023: 15.87%) held through Admirable Software Limited.
- (v) Including 16.78% (March 31, 2023: 0.63%) held through Admirable Software Limited.
- (vi) Including 43.75% (March 31, 2023: 43.75%) held through One 97 Communications India Limited.
- (vii) Including 4.90% (March 31, 2023: 4.90%) held through Paytm Payments Bank Limited.

## VI. CSR Details

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

**ii. Turnover (in ₹): ₹ 76,608 millions**

**iii. Net worth (in ₹): ₹ 1,23,390 millions**

\*However, the average net profit of the Company made during three (3) immediately preceding financial years is negative and hence, the Company is not statutorily required to spend any amount on CSR activities for the financial year 2023-24.



## 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			FY 2022-23		
		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	NA*	NA	NA	NA	NA	NA	NA
Investors (other than shareholders)	NA	NA	NA	NA	NA	NA	NA
Shareholders	<a href="https://paytm.com/document/ir/policies-and-guidelines/Investor_Grievance_Redressal_Policy_v2.pdf">https://paytm.com/document/ir/policies-and-guidelines/Investor_Grievance_Redressal_Policy_v2.pdf</a>	5	0	NA	17	0	NA
Employees and workers	<a href="https://paytm.com/document/ir/policies-and-guidelines/Anti_Bribery_Anti_Corruption_Policy.pdf">https://paytm.com/document/ir/policies-and-guidelines/Anti_Bribery_Anti_Corruption_Policy.pdf</a> <a href="https://paytm.com/document/ir/policies-and-guidelines/Whistle_Blower_Vigil_mechanism_policy.pdf">https://paytm.com/document/ir/policies-and-guidelines/Whistle_Blower_Vigil_mechanism_policy.pdf</a>	1,032	49	All 49 complaints have now been resolved as on date of the report.	27	5	All complaints have been resolved
Customers	<a href="https://paytm.com/company/terms-and-conditions?company=one97&amp;tab=grievance">https://paytm.com/company/terms-and-conditions?company=one97&amp;tab=grievance</a>	13,852	53	50 out of 53 complaints were resolved on the date of this report, and 3 are in the process of closure	9,847	0	All complaints have been resolved
Value Chain Partners	Yes, currently we have a help desk team to assist with vendor for the payment related queries, as mentioned in the purchase order. Company is establishing tracking mechanism for the grievances raised by value chain partners.	NA	NA	NA	NA	NA	NA

\*NA Stands for '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	Ethical Business Practices	Opportunity	Ethical business practices are crucial for maintaining regulatory compliance, fostering corporate social responsibility, ensuring ethical sourcing of materials, and enhancing transparency in business operations, thereby safeguarding reputation and trust among stakeholders.	NA	Positive
2	Supply Chain Management	Risk	Effective supply chain management involves identifying risks such as vendor instability and geopolitical factors that could disrupt operations. Implementing measures like supply chain diversification and digital tracking systems enhances resilience and minimizes the impact of potential disruptions.	To adapt supply chain management to potential risks, we shall implement diversification strategies, digital tracking systems, and proactive contingency planning to enhance resilience and minimize disruptions.	Negative
3	Workforce Wellbeing and Development	Opportunity	Ensuring a safe, healthy, and supportive work environment is vital for fostering employee well-being, promoting human rights, and facilitating effective recruitment and development practices. By prioritizing health, safety, and wellness initiatives, as well as upholding human rights principles, organizations can enhance employee satisfaction, productivity, and retention. Additionally, investing in employee recruitment and development programs strengthens organizational capabilities, fosters talent retention, and ensures a skilled and motivated workforce for sustainable growth.	NA	Positive
4	Product Quality and Innovation	Opportunity	Product quality and innovation are essential for maintaining customer satisfaction, staying competitive in the market, and driving continuous improvement. Investing in research and development initiatives allows organizations to anticipate and meet evolving customer needs, leading to sustained business growth and market success.	NA	Positive

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)
5	Corporate Governance and Compliance	Risk	Corporate governance and compliance are fundamental for ensuring legal and regulatory adherence, maintaining transparency in business operations, and upholding accountability to stakeholders. By promoting ethical conduct and robust governance frameworks, organizations mitigate legal risks, enhance trust among stakeholders, and safeguard their reputation in the marketplace.	Fostering a culture of ethical conduct, conducting regular compliance audits, and establishing clear reporting channels for swift action on violations will ensure robust corporate governance and compliance standards for us and avoid fines, settlements and sanctions on account of any misconduct/malpractice.	Positive
6	Financial Management and Inclusion	Opportunity	Effective financial management and inclusion initiatives are critical for promoting economic empowerment, expanding market access, and fostering financial stability. By implementing strategies to enhance financial inclusion, organizations can address the needs of underserved communities, mitigate financial risks, and contribute to sustainable economic development. Moreover, sound financial management practices ensure the efficient allocation of resources and strengthen resilience against market fluctuations.	NA	Positive
7	Risk Management	Risk	Risk management is essential for identifying potential threats to organizational objectives, assessing their potential impact, and implementing proactive measures to mitigate or manage them effectively. This includes risks related to product innovation and quality service, financial inclusion initiatives, and tax implications. By systematically addressing risks across various business areas, organizations can enhance decision-making, protect assets, and improve overall resilience in the face of uncertainty.	To adapt and mitigate risks effectively, we shall implement a systematic risk management framework tailored to address threats across all business areas, fostering a culture of awareness and accountability among employees. Effective risk management ensures resilience and business continuity in the face of uncertainty.	Positive
8	Community Development	Opportunity	We encompass various initiatives aimed at positively impacting society. By engaging in community activities, and supporting philanthropic endeavors, organization build trust with stakeholders, and contribute to long-term societal well-being.	NA	Positive

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)
9	Waste and Water management	Opportunity	By implemented waste collection plans aligned with the Central Pollution Control Board's (CPCB) Extended Producer Responsibility for Electronic waste, Plastic waste and additionally, the Company has significantly curbed paper usage across its operations, contributing to our eco conscious approach. For water management initiatives, we have STP at our corporate office in Noida for sewage water treatment and reuse for cooling tower, gardening purposes and safe disposal.	NA	Positive
10	Environment Sensitivity/ Sustainable Awareness	Opportunity	Our office building Skymark one at Noida is an Indian Green Building Council Platinum-certified building and is primarily focused on developing sustainable sites, increasing water and energy efficiency, reducing waste and emissions, use of eco-friendly building materials, and improving indoor environmental quality more efficiently than conventional designs like energy-efficient windows, LED lighting, energy-efficient appliances, geothermal heat pumps, energy-efficient insulation etc. Adopted the use of sensor-based water faucets and sensor-based lighting systems in toilets.	NA	Positive

## 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.

	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
<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	<a href="https://ir.paytm.com/policies-and-guidelines">https://ir.paytm.com/policies-and-guidelines</a> *								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	No	Yes	No	No	No	Yes
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) adopted by your entity and mapped to each principle.	All policies have been crafted with thorough consideration of industry best practices, regulatory mandates, and extensive consultation with pertinent stakeholders. Additionally, Paytm adheres to the ISO 27001:2013 standards, ensuring compliance with information security protocols.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	Annual refresher training at 100% on compliance, providing improved learning and training experiences year on year to different employee groups based on requirements and reporting via annual training dashboard.								

	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	100% completion of mandatory compliance trainings.								
<b>Governance, leadership and oversight</b>									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (The Company has flexibility regarding the placement of this disclosure).	<p>Paytm, as India's leading financial technology company, recognizes the critical importance of sustainability and is committed to integrating it into all aspects of our operations. We are dedicated to working towards sustainability as a core value, and have taken concrete steps to strategize our Environmental, Social, and Governance operations. Our vision is to embed sustainability into the heart of our business, ensuring its long-term success and positive impact. As we move forward, our focus remains on fostering sustainable practices that drive innovation and growth.</p> <p>For the current financial year, Paytm has collaborated with an external agency to revise our materiality, with the aim of ensuring a comprehensive understanding of our impact and priorities. This process will guide the development of our ESG strategy for the upcoming year, utilizing material indicators to align our efforts across departments and streamline our internal operations. With this approach, we aim to enhance transparency and accountability in our sustainability initiatives, driving positive outcomes for both our business and stakeholders.</p> <p>From a social perspective, we are committed to giving back to society through voluntary CSR initiatives, particularly focusing on education and financial inclusion and digital literacy. Internally, we are in the process of developing and implementing policies that will embed ESG principles into our core business practices and improve our governance. We aim to create lasting value for our employees, customers, and the communities we serve.</p> <p>At Paytm, sustainability is a goal and a fundamental part of our identity. We understand that our success is intrinsically linked to the well-being of our planet and communities. Through our ongoing efforts, we strive to create positive change and lead by example in the pursuit of a more sustainable future for all. With a commitment to continuous improvement, we will remain proactive in addressing sustainability challenges and driving positive impact across our ecosystem.</p>								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Madhur Deora, Executive Director, President and Group Chief Financial Officer								
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.	Yes, the CSR committee is responsible for making decisions on sustainability-related issues.								

\*Note: Relevant Policies are hosted on our website. However, policies relevant to Principle 2 and Principle 6 are not available in public domain but as a responsible company Paytm encourages its employees to follow sustainable practices.

### 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 (A)/ Half yearly (H)/ Quarterly (Q) / Any other – please specify								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against above policies and follow up action.	Committee of the Board									Q	A	Q	Q	Q	A	Q	A	Q
Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances.	Committee of the Board									Q	A	Q	Q	Q	A	Q	A	Q

	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
<b>11.</b> Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/ No). If yes, provide name of the agency.	Yes, we have undertaken a limited assurance on the BRSR with TUV India Private Limited (TUVI). However, it is limited assurance and hence does not include policies.								

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

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the Principles material to its business (Yes/No)	NA since answer to question (1) above is Yes								
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)									

## 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 awareness programmes*
Board of Directors	1	Code of Conduct (COC) policy applicable to the Directors & an overview of Conflict of Interest, Confidentiality, Anti Bribery and Anti Corruption (ABAC), Insider Trading	100%
Key Managerial Personnel	6	COC Policy, ABAC, Data Privacy, Prevention of Sexual Harassment (POSH), Cybersecurity & Acceptable Device Usage	100%
Employees other than BoD and KMPs	7	Organization Mitigates its risks by creating awareness on topics like Company Code of Conduct, ABAC, Acceptable Device Usage, Data Privacy, Cybersecurity, POSH and road safety training for Field Sales Executives	100%
Workers		Not Applicable	

**\*Note:** The 100% completion status is based on employee records as of February 29th, 2024. It is assumed that this completion rate will remain consistent for March joiners, considering they have an additional 30 to 60 days to complete their training in accordance with the Standard Operating Procedure (SOP).

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					
Particulars	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	P1-P9	NIL	NIL	NIL	NIL
Settlement	P1-P9	NIL	NIL	NIL	NIL
Compounding fee	P1-P9	NIL	NIL	NIL	NIL

Non-Monetary				
Particulars	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	P1-P9	NIL	No Case	NIL
Punishment	P1-P9	NIL	No Case	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
NIL	NA

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 an Anti-Bribery and Anti-Corruption Policy. The Company is committed to maintaining the highest level of professional and ethical standards in the conduct of its business. The Company has a zero tolerance towards bribery and corruption in any form, whether directly or indirectly through a third party. Further, the Company is committed to upholding all such laws and regulations, as may be applicable, in every jurisdiction where it has its operations.

Web Link - <https://paytm.com/company/terms-and-conditions?company=one97&tab=anti-bribery-anti-corruption>



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

Particulars	FY 2023-24	FY 2022-23
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NA	NA

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

Particulars	FY 2023-24		FY 2022-23	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors		NIL		
Number of complaints received in relation to issues of Conflict of Interest of the KMPs		NIL		

**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.**

NIL

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

Particulars	FY 2023-24	FY 2022-23
Number of days of accounts payables	46.29	65.53

**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:

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	NA	NA
	b. Number of trading houses where purchases are made from	NA	NA
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NA	NA

Parameter	Metrics	FY 2023-24	FY 2022-23
Concentration of Sales	a. Sales to dealers / distributors as % of total sales	0.01%	0.01%
	b. Number of dealers / distributors to whom sales are made	386	340
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors *	15.69%	22.71%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.18%	0.30%
	b. Sales (Sales to related parties / Total Sales)	19.44%	20.08%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances) **	79.02%	80.50%
	d. Investments (Investments in related parties / Total Investments made)	29.43%	53.69%

\*Total of top 10 number of dealers tag issuance cost / total dealers sales of tag issuance cost

\*\*Loans and advances are shown on a gross basis

### 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
100	Principle 3 (Health and Safety, Data Security, others)	50-55%

**\*Note:** We conduct training and awareness sessions for our value chain partners throughout the year, covering various critical aspects including healthcare, fire and safety, data privacy, and more.

#### 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, Paytm has established a Code of Conduct for its Board of Directors and Senior Management Team. This code mandates that all Directors act in the Company's best interests and ensure that any personal or business associations do not create conflicts of interest with the Company's operations. If conflicts arise, Directors are required to promptly report them and seek necessary approvals as per legal requirements and company policies.

Code of Conduct for Directors and Senior Management is available on Company's website at: [https://paytm.com/document/ir/policies-and-guidelines/Code\\_of\\_Conduct\\_for\\_Board\\_and\\_Senior\\_Management\\_Version\\_4.0](https://paytm.com/document/ir/policies-and-guidelines/Code_of_Conduct_for_Board_and_Senior_Management_Version_4.0)

## PRINCIPLE 2 Businesses should provide goods and services in a manner that is sustainable and safe

### Essential Indicators

- 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.**

Particulars	FY 2023-24	FY 2022-23	Details of improvements in environmental social impacts
R&D	0.19%	4%	Promoting sustainable growth of digital payments and enabling affordable access to financial services through additions to Project infinity – PG system developed inhouse.
Capex	69.91%	90%	Reduced paper usage, transitioning to software solutions and enhancing data management through adoption of Electronic Data Capture (EDC) devices, sandbox etc.

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

Yes, we have established a comprehensive sustainable sourcing policy that is currently being implemented across business. This policy encompasses various Environmental, Social, and Governance aspects, including: waste, emissions, labor and human rights, diversity and inclusion, data privacy.

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

As we are in the process of implementing our sustainable sourcing policy, we haven't commenced tracking the inputs as of yet. In future, we endeavor to diligently track our sourcing practices to ensure greater traceability across our value chain.

- Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for**

- Plastics (including packaging)
- E-waste
- Hazardous waste and
- other waste

Given the nature of its business, the Company has limited scope to use recycled material as processed inputs. All waste that is generated on our premises is disposed-off to Government authorized agencies who have sorting/processing units of their own.

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

Yes, EPR for E-waste, Plastic Waste and Battery Waste Management Rules are applicable to the Company, and the waste collection plan is in line with the EPR plan submitted to CPCB.

#### 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.
NIL					

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
NIL		

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 reused input material to total material	
	FY 2023-24	FY 2022-23
Not applicable	Not applicable	Not reported last year

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

	FY 2023-24			FY 2022-23		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	NA	NA	NA	Not Reported Last Year		
E-waste	1,177.64 MT*	227.35 MT	NA			
Hazardous waste	NA	NA	NA			
Other waste	NA	NA	NA			

\*To calculate the amount of reused Soundboxes and EDC's we used the total number of soundboxes (36,77,114) and EDC's (1,80,419) and multiplied the respective average weights of the different variations of Soundboxes (306.83 grams) and EDCs (273.75 grams), added the totals and converted the number to metric tonnes.

**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

**Note:** We are into technology enabled financial services business in which we lease sound boxes and other devices like EDCs to our merchants. If the devices are not working or the merchant is terminated, then the devices are returned back to the warehouse. In both cases, we check all returned devices and refurbish for further usage.

**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	26,504	26,504	100%	26,504	100%	NA	NA	26,504	100%	NA	NA
Female	1,603	1,603	100%	1,603	100%	1,603	100%	NA	NA	1,603	100%
Total	28,107	28,107	100%	28,107	100%	1,603	5.70%	26,504	94.30%	1,603	5.70%
<b>Other than Permanent employees</b>											
Male											
Female											
Total											

**\*Note:** The Child day-care facility extends an enhanced employee benefit to support our colleagues with small children so that each of us can work towards our career aspirations without compromising

on childcare. Further, enhanced childcare benefit policy reflects our commitment towards enabling workforce diversity and hybrid work model.

The Day care facility is applicable for mothers. This is in compliance with the Maternity Benefit Act, 1961 as well as the relevant guidelines laid out by the Government.

For Single parents of either gender, either parent for same gender couples, parents of either gender with a child clinically diagnosed with special needs (Physical or Mental disability), these are special cases and require approval of the Head of the Department. However, no such claim has been availed yet.

The children clinically diagnosed with special needs (Physical or Mental disability) are entitled to be admitted into a day-care centre that provides care for children with special needs.

The Company doesn't have a Day-care facility on the premises. Due to a large workforce working from home mode, we have tie-ups with nationally renowned third-party day-care facility centres in various cities which has been communicated to employees and full payment is provided directly to the day-care center.

**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											
Total											
<b>Other than Permanent workers</b>											
Male											
Female											
Total											

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

Particulars	FY 2023-24	FY 2022-23
Cost incurred on wellbeing measures as a % of total revenue of the company	0.22%	0.17%

Note: Paytm also invests in multiple employee engagement activities under the well-being initiatives such as Team and Business outings to focus on team engagements, Rewards & Recognition programs and celebration activities having a cumulative cost of INR 38.6 Crore in FY24 which is over and above the percentages reported above.

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

Benefits	FY 2023-24			FY 2022-23		
	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.)
PF	99.92%#	NIL	Yes	99.89%*	NIL	Yes
Gratuity	100%	NIL	NA	100%	NIL	Na
ESI	49.73%##	NIL	Yes	48.02%**	NIL	Yes
Others – please specify	NIL	NIL	NIL	NIL	NIL	NIL

### For FY'24:

#22 out of 28,107 Employees have not opted for PF

##13,977 employees are covered in ESIC (29 MG & 13,948 SG)

### For FY'23:

\* 28 out of 25,959 Employees have not opted for PF

\*\* 12,466 employees are covered in ESIC (32 MG & 12,434 SG)

## 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, we have wheelchairs and signages for inclusive restrooms in our major office, which are accessible to persons with physical disabilities. We also have ramps for easy access to the Company's premises.

## 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 implemented an Equal Employment Opportunity Policy for Persons with Disabilities in adherence to the Rights of Persons with Disabilities Act, 2016 and the Right of Persons with Disabilities Rules, 2017 ("Act"). This policy is aimed at empowering, safeguarding, and advancing the interests of individuals with disabilities who are employed within the company. It delineates our commitment to fostering an inclusive workplace and culture where disabled employees are treated with dignity and respect.

The policy ensures equal opportunities across all aspects of employment for persons with disabilities, fostering a non-discriminatory and inclusive work environment conducive to



their career growth, including those who acquire disabilities during their employment tenure. Additionally, the policy encompasses provisions for the provision of adequate facilities, amenities, and infrastructure, both physical and digital, to accommodate the needs of individuals with disabilities, facilitating their effective performance within the company.

Link: Equal Employment Opportunity Policy for Persons with Disabilities: <https://paytm.com/document/ir/policies-and-guidelines/Equal-opportunities-for-Employees.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%	73.60%	NA	
Female	100%	64.81%		
Total	100%	72.27%		

**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.**

Particulars	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	NA
Other than Permanent Workers	NA
Permanent Employees	Yes
Other than Permanent Employees	NA

**Note:** The Company operates a robust employee grievance redressal mechanism managed through the Consequence Management Policy, ensuring a readily accessible platform for prompt grievance resolution. Any grievances raised are addressed promptly without tolerance for any form of retaliation against employees. Reporting channels are clearly defined, allowing employees to voice concerns regarding work, culture, or team-related issues to their reporting manager, skip manager, HR Business Partner, HOD, or CHRO, following defined stages outlined in the policy. Furthermore, specific helpdesk IDs are provided for queries related to PF, payroll, etc.

Our Anti-Bribery and Whistle-Blower mechanism offers a formal platform to report grievances on various matters. The Compliance Officer ensures annual mandatory training for internal stakeholders to enhance policy compliance. Employees are briefed on the grievance mechanism through a dedicated module, enabling them to report concerns related to bribery or corruption using our vigil mechanism, facilitated by Navex Global to ensure confidentiality of complainants' identities.

We maintain a POSH Policy and an Internal Complaints Committee (ICC) in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013. Our policy is available on the Company's website, and the ICC, predominantly comprised of women

members, is responsible for investigating complaints. Regular sensitization sessions on preventing sexual harassment are conducted through workshops, group meetings, online modules, and awareness programs.

Link: [https://paytm.com/document/ir/policies-and-guidelines/POSH\\_Policy.pdf](https://paytm.com/document/ir/policies-and-guidelines/POSH_Policy.pdf)

Link: [https://paytm.com/document/ir/policies-and-guidelines/Whistle\\_Blower\\_Vigilmechanism\\_policy.pdf](https://paytm.com/document/ir/policies-and-guidelines/Whistle_Blower_Vigilmechanism_policy.pdf)

#### 7. Membership of employees and worker in association(s) or Unions recognized by the Company:

Category	FY 2023-24			FY 2022-23		
	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	26,504	NIL	NIL	24,310	NIL	NIL
- Female	1,603	NIL	NIL	1,649	NIL	NIL
<b>Total Permanent Workers</b>						
- Male	NIL					
- Female	NIL					

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

Category	FY 2023-24					FY 2022-23				
	Total (A)	On Health and safety measures		On Skill upgradation		Total (D)	On Health and safety measures		On Skill upgradation	
		No.(B)	% (B / A)	No.(C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
<b>Employees</b>										
Male	26,504	906	3.42%	10,271	38.75%	24,310	804	3.31%	11,754	48.40%
Female	1,603	297	18.53%	972	60.64%	1,649	296	17.95%	968	58.70%
Total	28,107	1,203	4.28%	11,243	40.00%	25,959	1,100	4.24%	12,722	49.01%
<b>Workers</b>										
Male	NIL									
Female	NIL									
Total	NIL									

**Note:** The headcount (HC) data pertains to all individuals (active & In-active) who were covered/ upskilled throughout the year i.e. until 31st March 2024.

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

Category	FY 2023-24			FY 2022-23		
	Total (A)	No. (B)	% (B / A)	Total (C)	No.(D)	% (D / C)
	<b>Employees</b>					
- Male	26,504	26,504	100%	24,310	22,308	91.76%
- Female	1,603	1,603	100%	1,649	1,316	79.81%
Total	28,107	28,107	100%	25,959	23,624	91.01%
	<b>Workers</b>					
- Male	NIL					
- Female	NIL					
Total	NIL					

**Note:** Every employee in the Company who was active as on 31st March 2024 had undergone performance feedback review with the line managers where the KRAs and goals were reviewed for career development. Frontline sales staff undergo real-time performance reviews on a monthly basis as part of their career progression plan. This approach allows for continuous feedback and advancement opportunities throughout the year.

**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, the coverage of such system?

Yes, there are minimal occupational health and safety risks associated with our business operations. The Company is actively developing an exclusive Occupational Health and Safety (OHS) Policy and framework, emphasizing the ongoing priority of employee well-being and safety. The following Health and Safety management systems have been implemented:

- Comprehensive physical and electronic security measures are in place, including manned security, access control systems, CCTV monitoring, and fire-fighting systems across all offices.
- The administrative team conducts regular emergency/disaster management drills, including fire-fighting exercises in alignment with the National Building Code.
- Offices are designed with ergonomic modular furniture to enhance employee comfort.
- Central heating, ventilation, and cooling systems equipped with air filters and air purifiers ensure clean indoor air, supported by air-purifying plants in all offices.
- A centralized helpline is available for employees to report work-related hazards.
- The Company has established partnerships with nearby hospitals to provide emergency medical support.
- Safe drinking water, clean and hygienic office environments, and food safety standards are maintained across all locations.

- h) The administrative team conducts regular checks, maintenance, and certification of all electromechanical equipment including lifts, HVAC systems, fire safety systems, DG sets, and UPS.
- i) CPR training is provided to the security personnel stationed in various offices. The Company has dedicated ERT members to act in emergency situations.

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

The entity employs numerous processes to identify and assess work-related hazards both on a routine and non-routine basis. These measures aim to mitigate risks effectively. Here are the key actions taken:

- Comprehensive security checks are conducted, encompassing physical security measures like manned guarding, access control systems, CCTV monitoring, and maintenance of fire fighting systems.
- A well-defined Disaster Management Plan is in place, the Company conducts emergency mock drill on annual basis, moving forward we will be conducting emergency mock drills on a half yearly basis.
- Regular water testing is carried out to monitor Total Dissolved Solids (TDS) levels.
- Heating, Ventilation, and Air Conditioning (HVAC) systems undergo periodic checks to ensure optimal performance.
- Building safety is maintained through periodic maintenance of electromechanical devices such as lifts, UPS, and Diesel Generators.
- Office hygiene and cleanliness are prioritized, contributing to a safe working environment.
- A Hybrid Office System and Work from Home Policy have been introduced to adapt to changing work dynamics.
- Security guards stationed at all offices are trained on fire safety equipment operation.
- Regular safety advisories are issued, covering various aspects such as weather warnings, fire safety, and security measures.

These proactive measures collectively contribute to maintaining a safe and secure workplace environment.

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

Yes, we have robust processes in place for employees to report work-related hazards and to remove themselves from such risks. We provide a centralized Helpline number and email for all employees to report any risks they encounter. Additionally, Quick Response Teams are stationed at all major offices to provide immediate support when needed. Our HR and Admin

teams regularly conduct health and safety awareness sessions facilitated by experts in various subjects. We also ensure continuous communication through mailers addressing health and safety concerns. To address mental health wellness, we organize sessions in collaboration with doctors from prominent hospitals. Furthermore, we have partnerships with several hospitals to offer employee discounts on medical tests and treatment.

Additionally, mental health wellness sessions in collaboration with healthcare professionals were organized, with a focus on topics like breast cancer awareness and headache management. Overall, our comprehensive approach prioritizes the safety and health of our workforce.

**d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)**

We provide health insurance coverage for our employees, ensuring they have access to medical services covered under the policy. Additionally, we organize health check-up camps periodically at our offices across India. Furthermore, we host monthly webinars featuring doctors from renowned hospitals to enhance health awareness among our employees.

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

Safety Incident/Number	Category*	FY 2023-24	FY 2022-23
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	NIL	NIL
	Workers	NIL	NIL
Total recordable work-related injuries	Employees	NIL	NIL
	Workers	NIL	NIL
No. of fatalities	Employees	NIL	11
	Workers	NIL	NIL
#High consequence work-related injury or ill-health (excluding fatalities)	Employees	NIL	NIL
	Workers	NIL	NIL

\*Including in the contract workforce

#Being a financial service providing company, our employees are not exposed to any high consequence work related injuries or ill health.

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

The Company has implemented a range of measures to ensure a safe and healthy workplace environment:

- Robust physical and electronic security measures are in place, including manned guarding, access control systems, CCTV monitoring, and Fire-fighting systems.
- Early fire detection is facilitated through the installation of fire and burglar alarms with fire and smoke sensors.
- Fire extinguishers are placed across all offices as per NBC norms, with regular maintenance to ensure functionality.

- Comprehensive training and awareness programs on firefighting best practices are conducted for both guards and employees. Regular mock drills and physical verification of fire safety equipment are also part of the protocol.
- Auto fire suppressants are installed in data/server rooms at selected offices.
- Measures such as earthing pits and lightning conductors are implemented to safely discharge lightning strikes.
- Contact numbers for emergency services like the fire brigade, police station, and ambulance are prominently displayed.
- Public address systems are installed for effective communication during emergencies.
- Emergency evacuation plans, floor plans, and exit paths are clearly displayed on each floor.
- CCTV cameras are utilized for surveillance and recording, including activities like sabotage.
- First-Aid Boxes are stocked in all offices, with regular first-aid training provided to employees and security guards.
- Dependents of employees are enrolled under Medclaim for medical coverage.
- Free shuttle services from the nearest metro station to the office are provided, enhancing convenience and reducing transportation risks.
- Emphasis is placed on maintaining cleanliness and hygiene in the dining area to uphold a healthy environment for all employees.

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

	FY 2023-24			FY 2022-23		
	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	NIL	NIL	NIL	NIL	NIL	NIL
Health & Safety	27	0	These incidents include employees experiencing health issues during office hours, logistical complaints within the office premises and other such instances.	Not Tracked	Not Tracked	NIL

**14. Assessments for the year:**

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices	NIL
Working Conditions	NIL

**Note:** The Company offers world-class workplaces for its employees. These workplaces have well appointed, safe and hygienic workspaces and ambient conditions. SkymarkOne Noida building (which is the Company's corporate office location) is an Indian Green Building Council Platinum certified building with indoor environmental quality more efficient than conventional designs like energy-efficient windows, LED lighting, energy-efficient appliances, geothermal heat pumps, energy-efficient insulation etc. Internal team assesses the health, safety, and environmental performance across applicable offices. Major offices are given training on fire safety and evacuation drills. Fire drills and audits are conducted in the office premises to ensure the maintenance of safety standards.

During the year, there were no accidents of any employee of the Company whilst on duty.

**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.**

The company took various measures to ensure the safety of the employees at work. Internal team assesses the health, safety, and environmental performance across offices. In all our offices regular training is imparted to all guards (safety, security, evacuation and first aid) on fortnightly basis and annually on disaster management, fire safety and evacuation drills for both employees and guards. Fire drills and audits are conducted on the office premises.

The Company has an emergency response plan in place and the process covers all employees and third parties of Paytm / One97 India across all centers. The Company is committed to continuously improve the performance of our health & safety management system through targeted action plans. The ERP (emergency response plan) outlines the procedures to be followed in the event of natural or man-made emergencies or disasters, political turmoil or criminal action which affects business operations and develops into emergency events.

**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, we have GTL (Group Term Life insurance coverage) for all the permanent employees and assistance for PF and Gratuity settlement is also extended to the family on the priority basis.



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

The Company has adequate mechanisms to ensure that requisite statutory dues, as applicable to the transactions of the Company with its value chain partners, are deducted and deposited in accordance with the applicable regulations. The Company also collects necessary certificates and proofs from its contractors with respect to payment of statutory dues like PF, ESIC, etc. relating to contractual employees and workers.

The Company expects its value chain partners to behave ethically and with integrity in all its business transactions and uphold standards of fair business practices. We have covered these aspects in our agreement with value chain partners.

**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 are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:**

Particulars	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	FY 2022-23	FY 2023-24	FY 2022-23
Employees	0	11	NIL	NIL
Workers	NIL	NIL	NIL	NIL

**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)**

No, While we don't offer standalone transition assistance programs, we recognize the wealth of experience retiring employees bring. We often enlist them as external consultants, leveraging their invaluable knowledge for specific projects as needed. Additionally, eligible employees receive gratuity upon retirement.

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

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	NIL
Working Conditions	NIL

**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.

OCL actively engages with different stakeholders to gain an understanding of their needs and expectations. We are currently in the process of implementing a comprehensive ‘Stakeholder Engagement Policy’ to enhance our stakeholder engagement and deepen trust. This policy outlines the purpose, scope, engagement plan, and communication details aimed at improving transparency and accountability. Our process for stakeholder identification, prioritization, and engagement aligns closely with our policy, ensuring consistency and effectiveness. The stakeholders have been identified based on:

- Those who are directly or indirectly related to our activities, products or services like employees or merchants.
- Those for whom the Company has legal, commercial, operational, or ethical/moral responsibilities like regulatory bodies; and
- Those who can influence or have impact on our decision-making like board/investors.

Furthermore, through our ESG efforts surrounding the process of capturing stakeholder voice related to material topic identification, we endeavor to continue engaging with our stakeholders in the future. This process serves to realign our actions with our overarching business and sustainability goals. By actively involving stakeholders, gathering their viewpoints, and developing our materiality matrix, we plan to continue developing business strategies, while keeping sustainability at the forefront of our decision-making processes.

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

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
Employees	No	Learning Management System & Emails	Monthly	<ul style="list-style-type: none"> <li>• Awareness on critical topics is conducted to mitigate Risk &amp; build awareness</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
				<ul style="list-style-type: none"> <li>Support with avenues for self development at work to excel in their roles.</li> </ul>
		Emails	Monthly/As required	<ul style="list-style-type: none"> <li>Organizational updates</li> </ul>
		Newsletter	Monthly/ As required	<ul style="list-style-type: none"> <li>Employee recognition and engagement activities.</li> </ul>
		Meeting with Line managers	Half yearly	<ul style="list-style-type: none"> <li>Employee performance review and career development.</li> </ul>
		Video conferencing or Physical meeting	Quarterly/As required	<ul style="list-style-type: none"> <li>Town Hall</li> </ul>
Customers	No	Social Media & Customer Help-Desk	As Required	<ul style="list-style-type: none"> <li>To stay in touch with the customer throughout and address any issues that the customer may have.</li> </ul>
Merchants	No	Business App Merchant help desk Physical meeting	As Required	<ul style="list-style-type: none"> <li>Resolving queries</li> <li>Support on the Sound box</li> <li>Support on information related to business with Companies</li> </ul>
Vendors/ suppliers	No	Emails/ Calls/ Physical meetings	As Required	<ul style="list-style-type: none"> <li>Obtaining quotation</li> <li>Contract negotiation and exploring new scope of work</li> <li>Signing and renewal of contracts, agreement, terms</li> <li>Resolving queries and assessing performance.</li> </ul>
Partners	No	Emails	Fortnightly	<ul style="list-style-type: none"> <li>Resolving queries and operational challenges.</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/ investors	No	Investor presentation, calls, emails and Press release.	Quarterly or as and when applicable, whichever is earlier	<ul style="list-style-type: none"> <li>• These are aimed at providing relevant information as well as understanding stakeholders’ perspectives on Company’s performance and strategy.</li> <li>• To update them with the recent market development.</li> </ul>
Government bodies	No	Face to face meeting Presentations	Weekly	<ul style="list-style-type: none"> <li>• Meetings and discussion with relevant Ministries, Departments, committees constituted by the Government on existing and proposed regulations / orders / directives and advisories undertaken on need basis.</li> </ul>
Media	No	Emails	Monthly	<ul style="list-style-type: none"> <li>• Sustained brand narrative communication through press releases, social posts and SE filings.</li> <li>• The announcements include partnerships, product launches, business updates and more.</li> <li>• This also includes engaging with the media in industry stories, or resolving queries with spokesperson statements.</li> </ul>
Board members	No	Board Meetings	Quarterly or as and when applicable, whichever is earlier	<ul style="list-style-type: none"> <li>• Company conducts a proactive and focused engagement which helps identify significant material issues for the Company, evaluate business strategy and operations, products, services and solutions, to minimize reputational risk, foster growth and positively influence our internal and external environment.</li> </ul>

## 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.**

We have implemented a strategic approach for stakeholder identification, prioritization, and engagement, synchronous with our ongoing efforts to implement our 'Stakeholder Engagement Policy.' This policy is meticulously designed to outline the purpose, scope, engagement plan, and communication details, all aimed at enhancing transparency and accountability. Throughout the year, our continuous engagement and regular interactions empower our teams to gather valuable feedback and information. This input is then shared with the senior management and reported to our ESG Committee for further review and action.

Our ESG Committee, operating under the guidance of the CSR Committee, plays a pivotal role in ensuring adherence to our ESG standards. This committee holds overall responsibility for effectively guiding, directing, and overseeing the Company's ESG-related progress. Periodically, the ESG Committee presents its findings to the CSR Committee, which in turn offers necessary recommendations to the Board and management on pertinent matters.

The responsibilities of the ESG Committee encompass a range of tasks, including approving, noting, and ratifying ESG goals, targets, and strategies. Additionally, they consult on ESG related stakeholder matters, monitor performance, oversee the execution of ESG initiatives, and ensure alignment with long-term ESG commitments and targets. Encompassing various ESG dimensions such as energy, water, waste, human rights, and supply chain, the ESG Committee also oversees material ESG risks and opportunities, actively seeking to mitigate risks while considering their financial implications.

**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, in the fiscal year 2023-24, guided by stakeholder consultations, we have begun implementing new policies developed in alignment with material topics and NGRBC principles. Furthermore, we have established an ESG committee and conducted financial inclusion sessions for women, along with a health and safety session for vendors.

We rely on internal stakeholder consultation for the identification and management of environmental and social topics. Additionally, to align our material topics with our business strategy and bring independence, we engaged an external consultant during the financial year, to gain comprehensive insights into emerging trends and best practices. In alignment with the sectoral guidance of leading ESG frameworks and indices, relevant material topics were identified and further refined.

The insights garnered from both internal consultations and external assessments have helped us craft our ESG strategy, in line with identified topics. New policies developed in alignment with the identified material topics and NGRBC principles are currently in the implementation phase. These identified topics shall serve as the foundation around which our strategy is built, and throughout the year, our ESG activities, targets and performance metrics across various departments will be developed accordingly.

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

We recognize the importance of giving back to society, and our company actively engages on various aspects of social and community development across India, in collaboration with numerous nonprofits to address the concerns of vulnerable/marginalized stakeholder groups. Aligned with our 'CSR policy,' which outlines the process of execution, utilization, monitoring, among others, our company focuses on addressing the concerns of these stakeholder groups. We continuously identify opportunities to improve the lives of the disadvantaged, vulnerable, and marginalized stakeholders through our ongoing CSR engagements.

Through one of our flagship educational CSR initiatives, Shikshit Bharat, we aim to bridge the digital gap between rural and urban areas, leveraging the pivotal role of technology in fostering equitable development. Via this program, we have distributed 186 laptops and 33 desktops to schools, nonprofits, and government bodies, primarily targeting the women in rural areas, providing digital tools to overcome educational, employment, and economic barriers, empowering them towards independence. Also, in collaboration with the Scaler Foundation, Paytm extended a scholarship to 24 underprivileged engineering students in Bangalore, aiming to support their higher education.

We also conducted comprehensive financial literacy sessions as part of our volunteering activities. These sessions have reached over 1000 women representing diverse organizations, delving into fundamental principles of finance management. By equipping participants with essential knowledge and skills, we empower them to navigate the intricacies of finance with confidence. Moreover, our employee volunteering efforts encompass 179 volunteers dedicating their time, benefiting a total of 5001 individuals, and accumulating a remarkable total of 1342 volunteering hours.

## 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 (C)	No. of employees / workers covered (B)	% (D / C)
	<b>Employees</b>					
Permanent	28,107	28,107	100%	25,959	21,484	82.76%
Other than permanent				NA		
Total Employees	28,107	28,107	100%	25,959	21,484	82.76%
	<b>Workers</b>					
Permanent						
Other than permanent				NIL		
Total Workers						

Note: The 100% completion status is based on employee records as of 29th February 2024. It is assumed that this completion rate will remain consistent for March joiners, considering they have an additional 30 to 60 days to complete their mandatory human rights training within the stipulated timelines.

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										
Male	26,504	NIL	NIL	26,504	100%	24,310	NIL	NIL	24,310	100%
Female	1,603	NIL	NIL	1,603	100%	1,649	NIL	NIL	1,649	100%
Other than Permanent										
Male										
Female						NIL				
	<b>Workers</b>									
Permanent										
Male										
Female						NIL				
Other than Permanent										
Male										
Female						NIL				



### 3. Details of remuneration/ salary/ wages

#### a. Median remuneration/ wages

Gender	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	4	165.87	1	207.49
Key Managerial Personnel	3	400	NIL	NIL
Employees other than BoD and KMP	26,501	4.16	1,603	10.82
Workers			NA	

**Note:** 1 This is as per the CTC of employees who were active as on 31st March 2024.

2 Figures are in ₹ Lakhs

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

Particulars	FY 2023-24	FY 2022-23
Gross wages paid to females as a % of total wages	10.33%	10.68%

\* The disclosure has been done on the basis of the salaries (CTC) paid to females. The Company has no workers and hence have no wages paid.

### 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 various committees that oversee various issues related to human rights which fall under their purview.

The Company has established a HR Risk and Compliance team and a Disciplinary Committee team that looks at the escalations concerning human rights. The committee is responsible to conduct thorough investigations and prepare a detailed report as per the defined process. The processes are defined in the Consequence management policy hosted on the Company's Intranet- DeepPurple.

The internal team of the Company responsible for the implementation of the Anti- Bribery and Anti-Corruption (ABAC) Policy manage and oversee all the concerns/complaints raised via the whistle blower mechanism. The status of the said complaints is presented in the quarterly Audit Committee/Board meetings, in compliance with ABAC and Vigil Mechanism/Whistle Blower Mechanism Policy of the Company.

The Company has zero tolerance for sexual harassment at workplace and is compliant with provisions relating to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. We have an ICC responsible to investigate and provide redressal for any kind of sexual harassment. A helpline number and a designated email ID for ICC is shared to employees to raise complaints or get counseling.

The Company also promotes a non-discriminatory work environment and abides by the equal opportunity for all policy. It also has a Consequence Management Policy where any kind of reported or suspected misconduct is corrected or investigated upon by following a disciplinary procedure setup by the disciplinary action committee. The committee is responsible for maintaining the repository of the investigations as well.

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

The organization maintains a Consequence Management Policy to outline potential corrective actions for employee misconduct. This policy, accessible on the intranet platform Deep Purple, ensures transparency in disciplinary procedures. Our leadership emphasizes accessibility, allowing employees to directly raise grievances through the HRMS platform.

Aligned with the whistle-blower mechanism, stakeholders are expected to report concerns such as bribery, corruption suspicions, behavioral issues, or discrimination. Confidentiality of complainants is upheld, with reporting facilitated through the web portal "Navex Global." Detailed instructions for reporting are available on the intranet and in the ABAC Policy on the Company's website.

Each complaint submitted through the Navex portal receives a unique case number for tracking purposes. Timely investigations are conducted, ensuring regulatory compliance. Following investigation completion, a report with recommended actions is submitted to relevant stakeholders, including the Disciplinary Action Committee, guided by the Consequence Management Policy. This policy ensures protection against retaliation for complainants raising concerns in good faith, regardless of their ultimate substantiation.

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

Particulars	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual Harassment	0	0	NA	5	1	The pending case was closed during FY 2023-24.
Discrimination at workplace	16	2	All 2 complaints have been resolved as on the date of this report.	14	1	HR team was unable to investigate as the Complainant chose to remain anonymous and did not specify any names of the accused individual(s).
Child Labour	NIL	NIL	NIL	NIL	NIL	NIL

Particulars	FY 2023-24			FY 2022-23		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Forced labor/ Involuntary labor	NIL	NIL	NIL	NIL	NIL	NIL
Wages	12	3	All 3 complaints have been resolved as on date of the report.	5	0	
Other human rights related issues	41	7	As on date of this report, all the complaints have been resolved and 1 is in the process of closure.	8	4	Complaints could not be investigated due to incomplete details. Reminders were sent to the Complainants via Navex Tool to share their contact details as well as details relating to the accused so that the investigating team would be in a position to investigate the matters. No response has been received from the Complainant yet.

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

Particulars	FY 2023-24	FY 2022-23
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	0	5
Complaints on POSH as a % of female employees / workers	0%	0.3%
Complaints on POSH upheld	0	0

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

As mentioned in our Code of Conduct, the Company and all its affiliate Companies shall provide equal opportunities to all its employees/Personnel and all qualified applicants for employment without regard to their race, caste, religion, colour, ancestry, marital status, work experience, gender, sexual orientation, age, nationality, ethnic origin or disability. We have adopted policies which reinforce to the stakeholders, who raise complaints on a concrete and reasonable belief about a violation, that they will not be subjected to any kind of retaliation such as discrimination, reprisal, harassment, victimization etc. irrespective of the concern being ultimately substantiated.

The Company has zero tolerance for any kind of harassment and discrimination. Our Human Resource policies and Code of Conduct promote diversity and equality in the workplace, as well as compliance with all local labour laws, while encouraging the adoption of international best practices.

Employee policies and practices are administered in a manner consistent with applicable laws and other provisions of the Code of Conduct, respect for the right to privacy and the right to be heard, and that in all matters equal opportunity is provided to those eligible and decisions are based on merit.

In addition, the POSH Policy has been formed under the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment. In case any allegations of sexual harassment are substantiated by the ICC, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.

The Company also has a whistle blower mechanism that empowers its employees to raise the concerns, if any, for instances like bribery, suspicion of corruption, behavioral issues, discrimination etc. via this vigil mechanism. Complaints reported to any internal stakeholder (reporting manager/ HR team/ Compliance Officer) of any potential violation are channelized to the whistle blowing mechanism. The identity of the complainants is kept confidential during the investigation. The Company has enabled the web portal "Navex Global" to take anonymous complaints and facilitate reporting of the protected disclosures routed through the web links, toll-free number and application access mentioned in detail on the Intranet, Deep Purple. The Company investigates all the complaints reported under the whistle blowing mechanism after the due approval from a member of the Disciplinary Action Committee in a timely manner. The investigating team ensures compliance with all the regulatory requirements during the course of investigation. After the completion of the investigation, a report is submitted with recommended measures to the Disciplinary Action Committee. The Disciplinary Action Committee initiates

disciplinary actions as appropriate based on the findings and recommendations of such a report. The committee is guided by the existing Consequence management Policy. The details of the same and ABAC Policy are available on the Company's website.

The organization on a regular basis sensitizes its employees on the prevention of sexual harassment at the workplace through workshops, group meetings, online training modules and awareness programmes.

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

Yes, our Code of Conduct is applicable to all our employees, employees of service providers or vendors, employees of business partners, consultants, retainers, trainees, or any individual engaged for providing services to the Company who have to comply with all applicable laws, including labour laws which forms a part of our vendor/service provider contracts and business requirements.

**10. Assessments for the year:**

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	NIL
Forced/involuntary labour	NIL
Sexual harassment	NIL
Discrimination at workplace	NIL
Wages	NIL
Others – please specify	NIL

**11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above.**

Not Applicable. Although, we internally make sure to amend and follow compliances from time to time.

**Leadership Indicators**

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

Not applicable

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

NIL

**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

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

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	NIL
Discrimination at workplace	NIL
Child Labour	NIL
Forced Labour/Involuntary Labour	NIL
Wages	NIL
Others	NIL

**Note:** Terms and conditions incorporated in the Purchase order are already described and value chain partners are expected to follow terms and conditions.

Our Code of Conduct applies to all directors and employees of the Company, its subsidiaries and its affiliates, and employees of service providers or vendors, employees of business partners, consultants, retainers, trainees or any individual engaged providing services within the Company's premises.

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

NA

**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	FY 2022-23
<b>From renewable sources</b>		
Total electricity consumption (A)	NA	NA
Total fuel consumption (B)	NA	NA
Energy consumption through other sources (C)	NA	NA
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>NA</b>	<b>NA</b>
<b>For non - renewable resources (in GJ)</b>		
Total electricity consumption (D)	12,706.95	10,747.44
Total fuel consumption (E)	1,177.39	39,961.30
Energy consumption through other sources (F)	NA	NA
<b>Total energy consumed from nonrenewable sources (D+E+F)</b>	<b>13,884.34</b>	<b>50,708.74</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>13,884.34</b>	<b>50,708.74</b>

Parameter	FY 2023-24	FY 2022-23
<b>Energy intensity per rupee of turnover</b> (Total energy consumed / Revenue from operations)	0.0000001812 GJ/₹	0.0000008413 GJ/ ₹
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP)	0.000000008649 GJ/\$ PPP	0.000000040158 GJ/\$ PPP
<b>Energy intensity in terms of physical output</b>	NA	NA
<b>Energy intensity (optional)</b> – the relevant metric may be selected by the entity	0.4939 GJ/FTE	1.953 GJ/FTE

**Note:** The data for electricity consumption is for 70 offices and fuel consumption is for 7 DG sets and Vehicle fleets across our offices.

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

Yes, we have undertaken a limited assurance on the BRSR with TUV India Private Limited (TUVI).

**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.**

Not Applicable

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

Parameter	FY 2023-24	FY 2022-23
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	NA	NA
(ii) Groundwater	32,780.30	NA
(iii) Third party water	NA	NA
(iv) Seawater / desalinated water	NA	NA
(v) Others (packaged drinking water)	2,075.64	515
<b>Total volume of water withdrawal (In kilolitres) (i + ii + iii + iv + v)</b>	32,780.30*	0
<b>Total volume of water consumption (In kilolitres)</b>	34,855.94	515
Water intensity per rupee of turnover (Total water consumption / Revenue from operations)	0.000000455 KL/₹	0.0000000085 KL/₹
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption / Revenue from operations adjusted for PPP)	0.000000021718 KL/\$ PPP	0.000000000406 KL/\$ PPP
Water intensity in terms of physical output	NA	NA
<b>Water intensity (optional)</b> – the relevant metric may be selected by the entity	1.24012 KL/FTE	0.01986 KL/FTE

**Note:** Raw water data is available for three locations: Skymark Noida, SJR Bangalore, and Kolkata. For the remaining offices, water consumption is calculated by considering Paytm's occupancy within a specific office site multiplied with an assumption constant of 45 L/per person of water consumption as per CGWB.

Data on packaged drinking water is for 64 sites, while the remaining offices utilize direct RO systems.

\*Packaged drinking water is directly procured from registered vendors in bottles, hence it is not considered in water withdrawal but considered in water consumption.

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

Yes, we have undertaken a limited assurance on the BRSR with TUV India Private Limited (TUVI).

#### 4. Provide the following details related to water discharged:

Parameter	FY 2023-24	FY 2022-23
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) To Surface water		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(ii) To Groundwater		
- No treatment	NA	NA
- With treatment – please specify level of treatment (I)	NA	NA
(iii) To Seawater		
-No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iv) Sent to third-parties		
- No treatment	NA	NA
- With treatment – Membrane Bioreactor Treatment	8,566*	NA
(v) Others		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
<b>Total water discharged (in kilolitres)</b>	<b>8,566 kL</b>	<b>NA</b>

\*The water discharge value is derived from calculated assumptions, taking into account the total water discharge of the corporate tower's combined facility. This calculation considers Paytm's occupancy within a specific tower.

**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.

Yes, we have undertaken a limited assurance on the BRSR with TUV India Private Limited (TUVI).

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

Not Applicable



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

Parameter	Unit	FY 2023-24	FY 2022-23
NOx	TPY	1.178	35.75
SOx	TPY	0.178	0.50
Particulate matter (PM)	TPY	0.220	0.94
Persistent organic pollutants (POP)	TPY	NIL	NIL
Volatile organic compounds (VOC)	TPY	NIL	4.64
Hazardous air pollutants (HAP)	TPY	NIL	0.0372
Others – please specify Carbon Monoxide (CO)	TPY	0.465	23.03

**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.

No assessment/evaluation/assurance was carried out for this indicator by an external agency during the year.

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

Parameter	Unit	FY 2023-24	FY 2022-23
<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)	Metric tonnes of CO <sub>2</sub> equivalent	536.49	4,150.42
<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)	Metric tonnes of CO <sub>2</sub> equivalent	2,527.27	2,125.01
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	MtCO <sub>2</sub> e/₹	0.00000004	0.0000001041
<b>Total Scope 1 and Scope 2 emission 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)	MtCO <sub>2</sub> e/\$	0.000000001909	0.000000004969
Total Scope 1 and Scope 2 emission intensity in terms of physical output	NA	NA	NA
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity	MtCO <sub>2</sub> e/FTE	0.109	0.242

**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.

Yes, we have undertaken a limited assurance on the BRSR with TUV India Private Limited (TUVI).

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

We are proud to represent our nation on the global stage, actively advocating for sustainable practices. Since December 2017, our Founder & CEO, Vijay Shekhar Sharma, has been serving as the United Nations Environment Programme's (UNEP) advocate for Clean Air. He has been instrumental in driving environmental action and awareness, championing UNEP's global #BreatheLife campaign, which focuses on improving air quality and influencing policy and citizen action for a healthier future.

In collaboration with UNEP, our CSR arm, Paytm Foundation, launched the Air Quality Action Forum (AQAF) last financial year. This national-level forum brings together regulators, national and international philanthropic organisations, international development agencies, and the corporate sector. The goal is to identify needs, gaps, and solutions to India's air quality problems, ensuring structured project implementation with a yearly action plan. AQAF facilitates an inclusive approach to tackling air pollution through stakeholder engagement.

Vijay also serves on the Advisory Board of the Green Digital Finance Alliance. This Alliance explores the potential for digital finance and fintech innovations to reshape the financial system in alignment with sustainable development goals. Our initiatives, such as reducing paper usage by promoting digital transactions and e-receipts, reflect our commitment to conserving resources and reducing pollution.

Paytm's 'Box of Joy' initiative epitomises purposeful gifting with environmental consciousness and community engagement. Central to this initiative is the 'Vriksharopan' project, where Paytm pledges to plant two trees for each employee in the newly established Paytm Forest near the National Capital Region (NCR), in collaboration with the Sankalptaru Foundation. This afforestation effort addresses environmental concerns and contributes to socio-economic empowerment by providing livelihood opportunities to local communities responsible for nurturing these trees.

Each tree planted under the 'Box of Joy' initiative is geotagged, allowing employees to monitor their growth and visit the site. This deepens their connection with nature and reinforces Paytm's dedication to community welfare and environmental sustainability. This comprehensive approach exemplifies how Paytm seamlessly integrates joy, environmental stewardship, and social responsibility into its operational framework.

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

Parameter	FY 2023-24	FY 2022-23
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	NA	NA
Flexible Plastic Waste	NA	59 MT
E-waste (B)	238.11 MT	129.01 MT*
Bio-medical waste (C)	NA	NA
Construction and demolition waste (D)	0.1 MT	NA
Battery waste (E)	27.15 MT	1.06 MT
Radioactive waste (F)	NA	NA
Other Hazardous waste. Please specify, if any. (G)	NA	NA
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)- Dry waste or Wet waste (Food Waste, Tea Bags & Other Cafeteria Waste etc)	45 MT	13 MT
<b>Total (A+B + C + D + E + F + G + H)</b>	310.36 MT	202.07 MT
<b>Waste intensity per rupee of turnover</b> (Total waste generated / Revenue from operations)	0.0000000041 MT/₹	0.0000000034 MT/₹
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Revenue from operations adjusted for PPP)	0.000000000196 MT/\$ PPP	0.000000000162 MT/\$ PPP
<b>Waste intensity in terms of physical output</b>	NA	NA
<b>Waste intensity (optional)</b> – the relevant metric may be selected by the entity	0.011042 MT/ FTE	0.007784 MT/ FTE
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	265.25 MT	202.07 MT
(ii) Re-used	0	0
(iii) Other recovery operations	0	0
Total	265.25 MT	202.07 MT
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	NIL	NIL
(ii) Landfilling	45.12	NIL
(iii) Other disposal operations	NIL	NIL
Total	45.12	NIL

**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.

Yes, we have undertaken a limited assurance on the BRSR with TUV India Private Limited (TUVI).

**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.**

The Company's operations do not involve the use of hazardous or toxic chemicals. In managing electronic waste (e-waste) responsibly, the Company has implemented comprehensive systems across all its facilities in India. Our dedication to environmental stewardship extends to the handling of e-waste assets, which undergo a structured disposal process. We strictly adhere to our comprehensive E-Waste Policy, ensuring the proper management of e-waste resulting from our business operations. To uphold these standards, we collaborate with e-waste vendors approved by the Central Pollution Control Board (CPCB), guaranteeing responsible and compliant e-waste handling practices across our operations.

The Company has also devised a comprehensive waste collection strategy in accordance with the Extended Producer Responsibility (EPR) plan submitted to the CPCB. To efficiently manage other forms of waste, the Company segregates and stores generated waste into two distinct categories: dry waste and wet waste, utilizing appropriate bins for this purpose. All waste generated on our premises is managed through our partnerships with government-authorized agencies equipped with sorting and processing facilities.

**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.
1	NIL	NIL	There are no offices and/or operating sites in or around ecologically sensitive areas where environmental approvals are required.

**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 instead of locations of operations/offices	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
NA					

**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, the Company is in compliance with all applicable environmental laws.

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
NA				

### 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
- (ii) Nature of operations
- (iii) Water withdrawal, consumption and discharge in the following format:

Not Applicable

Parameter	FY 2023-24	FY 2022-23
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	NA	NA
(ii) Groundwater	NA	NA
(iii) Third party water	NA	NA
(iv) Seawater / desalinated water	NA	NA
(v) Others	NA	NA
Total volume of water withdrawal (in kilolitres)	NA	NA
Total volume of water consumption (in kilolitres)	NA	NA
Water intensity per rupee of turnover (Water consumed / turnover)	NA	NA
<b>Water intensity (optional)</b> – the relevant metric may be selected by the entity	NA	NA
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) Into Surface water		NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(ii) Into Groundwater		NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA

Parameter	FY 2023-24	FY 2022-23
(iii) Into Seawater		NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iv) Sent to third-parties		NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(v) Others		NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
<b>Total water discharged (in kilolitres)</b>	<b>NA</b>	<b>NA</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.

Yes, we have undertaken a limited assurance on the BRSR with TUV India Private Limited (TUVI).

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

Parameter	Unit	FY 2023-24	FY 2022-23
Total Scope 3 emissions (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)*	Metric tonnes of CO <sub>2</sub> equivalent	65,869.73	Not Tracked
Total Scope 3 emissions per rupee of turnover	MtCO <sub>2</sub> e/₹	0.000000859828	Not Tracked
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	MtCO <sub>2</sub> e/FTE	2.34	Not Tracked

\*Total Scope 3 emissions has been calculated by considering 5 major categories which are mentioned below:

Capital Goods, Fuel & Energy Activities, Waste Generated, Employee Commute and Business Travel.

**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.

No assessment/evaluation/assurance carried out for this indicator by an external agency during the year.

**3. With respect to the ecologically sensitive areas reported at Question 11 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:**

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Paytm Soundbox	<p>Paytm Soundbox provides instant audio confirmation for the amount received. It also has our All-in-One QR Code, enabling merchants to accept payments from multiple instruments like Paytm Wallet, Debit &amp; Credit Cards, Net Banking and Paytm UPI.</p> <p>The feature is available in 11 languages (English, Hindi, Kannada, Telugu, Tamil, Malayalam, Punjabi, Marathi, Gujarati, Bengali, Odia), which facilitated its usage across the country.</p>	<p>In the last FY, a total of 21,969 million Sound-box-based transactions have been completed through Paytm-enabled Sound boxes. This has enabled saving paper slips worth 19.3 million pounds in the last one year. (Considering each paper slip 5.7cm*10 cm, having 70 GSM paper).</p>

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

The Company has formulated a comprehensive disaster management plan to delineate the protocols to be followed in the event of natural or man-made emergencies, political unrest, or criminal activities that could disrupt business operations and escalate into emergency situations. This plan outlines the specific procedures to be enacted during such occurrences.

The Emergency Response Plan (ERP) documentation encompasses the following key components:

- Establishment of an Emergency Response Team (ERT): Comprising individuals trained to prepare for and respond to emergency incidents, the ERT addresses a wide spectrum of potential crises, including natural disasters and industrial accidents. Through ongoing training and awareness-building exercises, the ERT enhances preparedness and response capabilities.
- Deployment of a Quick Response Team (QRT): Operating round-the-clock as the initial responders, the QRT comprises a designated driver and two Civil Defence Volunteers skilled in firefighting, search and rescue, and first aid. During emergencies such as fires, the Emergency Coordinator assumes primary responsibility for coordinating staff response efforts and liaising with external emergency services. Additionally, the Emergency Coordinator oversees the training and designation of QRT members in fire prevention techniques.

- Documentation of Incidents: Incident reports serve as comprehensive records detailing the circumstances and outcomes of emergency events. These reports are integral for post-incident analysis, enabling the organization to learn from past incidents, mitigate risks, and enhance preparedness for future emergencies.

**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.**

As of the current date, Paytm has not conducted an impact study for its supply chain focused on the environment. However, we are committed to making our supply chain sustainable. We are in the process of implementing a sustainable sourcing policy that will enable us to track and manage the environmental and social impacts across our value chain. Through this policy, we aim to foster transparency, accountability, and responsible practices throughout our operations.

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

NA

**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.**

The Company is affiliated to Seven (7) trade and industry chamber/associations.

**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	Internet & Mobile Association of India (IAMAI)	National
2	National Association of Software and Services Companies (NASSCOM)	National
3	Associated Chambers of Commerce and Industry of India (ASSOCHAM)	State & National
4	Federation of Indian Chambers of Commerce and Industry (FICCI)	State & National
5	Digital Lenders Association of India (DLAI)	National
6	Confederation of Indian Industry (CII)	State & National
7	Alliance of Digital India Foundation (ADIF)	National



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

Name of authority	Brief of the case	Corrective action taken
	There were no incidents of anti-competitive behavior involving the Company during the reporting period (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 public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
1	Submitted inputs to Telecom Regulatory Authority of India (TRAI) on "Digital Inclusion in the Era of Emerging Technologies"	Submission to Telecom Regulatory Authority of India (TRAI)	No	NA	NA
2	MoU signed with MoMSME for enabling PM Vishvakarma artisans with digital payment acceptance devices	Meeting with MoMSME	No	NA	NA
3	Submitted inputs through meetings & presentations to the Ministry of Panchayati Raj regarding the payment digitization using UPI of all the panchayats raj institutions of India	Meeting & Presentation to Ministry of Panchayati raj	Yes	NA	<a href="https://cdnbbsr.s3waas.gov.in/s316026d60ff9b54410b3435b403afd226/uploads/2023/06/2023061969.pdf">https://cdnbbsr.s3waas.gov.in/s316026d60ff9b54410b3435b403afd226/uploads/2023/06/2023061969.pdf</a>

## 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
NIL					

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)
NIL						

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

Given the nature of the business, this is not applicable to the Company.

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

Particulars	FY 2023-24	FY 2022-23
Directly sourced from MSME/ small producers	32%	28%
Directly from within India	67%	72%

5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost

Location	FY 2023-24	FY 2022-23
Rural	0.00%	0%
Semi-urban	0.43%	0.50%
Urban	60.57%	71.06%
Metropolitan	39.00%	28.44%

Note: The percentages are calculated on the basis of CTC for the employees active as on 31st March '24 (for FY24) and 31st March '23 (for FY23).

RBI Classification on the website was done on the basis of District. Paytm has used office locations of the employees to map according to rural, urban, semi-urban and 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
Not Applicable	

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 INR)
1	Jammu & Kashmir, Delhi, Uttar Pradesh (Shikshit Bharat - An initiative by Paytm Foundation promoting education and digital literacy by donating laptops/ Desktops to underprivileged students)	No	0.43 Millions*
2	Karnataka (Partnering with the Scaler Foundation, we provided a scholarship of INR 1 CR. for four years to 24 students)	No	2.50 Millions

\* Depreciated Value of used laptops and desktops

### Contribution to other projects other than CSR

S. No.	State	Aspirational District	Amount spent (In INR)
1	Orissa Donation to CMRF Orissa - Supported victims of the Balasore Train Accident through CMRF Orissa	No	5.65 Millions

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

Yes. As per our sustainable sourcing policy, we have a component dedicated to fostering social inclusivity, that discusses preferential procurement. The policy entails encouraging diversity and inclusivity within our supply chain, thereby supporting businesses owned by women, minorities, and other underrepresented groups.

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

We are in the process of implementing our sustainable sourcing policy, we haven't commenced tracking the parameters.

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

We are in the process of implementing our sustainable sourcing policy, we haven't commenced tracking the parameters.

**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
		NA		

**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 the Authority	Brief of the case	Corrective action taken
	NA	

**6. Details of beneficiaries of CSR Projects:**

S. No.	CSR Project	No of persons benefited from CSR projects	% beneficiaries from vulnerable and marginal groups
1	Shikshit Bharat	7,721	36.19%
2	Scaler Foundation	24	100%

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

### **Essential indicators**

#### **1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

##### **Customer and merchant care**

The Company recommends customers and merchants to carefully go through the help pages that provide self-help. For queries and concerns that are not addressed through the help pages, the customers and merchants can contact the care team through the Paytm App and Paytm for Business App.

##### **Customer queries -**

In-app support: <https://m.paytm.me/paytm-help> (Please use via Mobile)

##### **Merchant queries -**

In-app support: <https://b.paytm.me/help-support> (Please use via Mobile)

Contact: 0120-444 0440

Our in-app support channel is able to resolve a vast majority of customer complaints. In any uncommon scenario, where one wishes to escalate the concern to the next level, one needs to ensure that they have already exhausted the previous level(s) and their concern remains unresolved or not resolved to their satisfaction. This is not a channel but a reactive means to address those who raise concerns on social media.

##### **Social Media - (only a reactive channel)**

Twitter: [@Paytmcare](https://twitter.com/Paytmcare)

Facebook: <https://www.facebook.com/Paytm>

LinkedIn: <https://www.linkedin.com/company/paytm/>

##### **Grievance redressal - Loan Distribution**

We have formulated an escalation matrix to ensure that concerns of the consumers are routed and addressed by the right team. The below escalation matrix is available for the consumers to read and understand in order to ensure a timely redressal of their concerns.

## Service Levels

### Service Levels for Loan Distribution Products

#### Level 1

Complaints Registration:

- One can register complaints with our Customer Support by clicking on any of the above links.
- We offer customer support service 24 hours a day and 7 days a week.

Resolution of Complaints:

- We are committed to providing customers with our first response within 24 hours of receiving the complaint.
- Resolution of the complaint may get delayed due to operational or technical reasons. In such a scenario, concerned customers will be proactively informed of the timelines during which their complaint will be addressed.
- Complaints related to 'Suspected Fraud' often take longer to investigate due to the involvement of multiple agencies. The resolution time in such cases is dependent on the severity and complexity of the case. One shall be proactively informed of the timelines in such cases.

#### Level 2

1. Complaints Registration: Before reaching out to Level 2, we request the customers to contact Level 1 support channels mentioned above. If they have already reached out to Level 1 and have not received a satisfactory resolution, they can share the details of their complaint on the below e-mail ID.
2. Important Note – Complainant will need to mention the Level 1 Ticket # in the subject line of the e-mail. If complainant does not have a Level 1 ticket #, they can always raise a ticket using the links. Any complaint at Level 2 will not be entertained if the Level 1 ticket number is not mentioned.
  - One can register a complaint on [grievance-redressal\\_loandistribution@paytm.com](mailto:grievance-redressal_loandistribution@paytm.com)
3. Resolution of Complaints:
  - We are committed to providing a first response within 24 hours of receiving the complaint.
  - We aim to resolve all Level 2 complaints within 3 business days. Any delay in the resolution time shall be proactively communicated to the concerned customer.
  - Paytm (One97 Communications Limited) will coordinate with the respective lending partner to resolve complaints and communicate the lender's resolution to the customer.

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

Particulars	As a percentage of total turnover
Environmental and social parameters relevant to the product	Soundbox: 10.93%
Safe and responsible usage	POS Machine: 2.84%
Recycling and /or safe disposal	Soundbox: 10.93%
	POS Machine: 2.84%

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

	FY 2023-24 Current Financial Year			FY 2022-23 Previous Financial Year		
	Received during the year	Pending resolution at the end of the year	Remarks	Received during the year	Pending resolution at the end of the year	Remarks
Data privacy	11	0	NA	6	2	All pending complaints have been resolved
Advertising	0	0	NA	5	0	NA
Cyber Security	0	0	NA	0	0	NA
Restrictive Trade Practices	NA	NA	NA	NA	NA	NA
Unfair Trade Practices	NA	NA	NA	NA	NA	NA
Others	13,841	53	Source of complaints: RBI, BO, GRO, Nodal, Grievance emails Includes addition of new services like Pro Max program, Gold.  50 out of 53 complaints were resolved on the date of this report, and 3 are in the process of closure.	9,900	52	All pending complaints have been resolved

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

Particulars	Number	Reason for recall
Voluntary recalls		
Forced recalls		NIL

**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 is deeply committed to safeguarding sensitive information and maintaining the integrity of its operations, has meticulously crafted a comprehensive 'Information security policy' and 'Acceptable usage policy', which are currently in the process of being implemented. These policies serve as the foundation for our digital defense strategy, outlining stringent measures to thwart potential threats and uphold the trust of stakeholders. These meticulously delineates protocols for scope, data management, access control, confidentiality, incident response, and compliance with regulatory requirements, as per applicability.

Privacy Policy ([paytm.com](https://paytm.com))

<https://paytm.com/company/terms-and-conditions?company=one97&tab=privacy>

**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.**

During the financial year, no incidents has been reported, requiring corrective actions in advertising, delivery of essential services, cyber security, or product recalls occurred, nor were there penalties from regulatory authorities regarding product/service safety.

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

a. Number of instances of data breaches

No cases of data breach were found.

b. Percentage of data breaches involving personally identifiable information of customers

The Company did not witness any instances of data breaches during the year. The Company also has a cyber risk insurance policy.

c. Impact, if any, of the data breaches - NA

**Leadership Indicators**

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

Paytm's extensive portfolio of products and services is tailored to cater to the unique requirements of both the Indian economy and the broader societal landscape, thereby ensuring alignment with their distinct needs. Details regarding the diverse range of offerings are readily accessible on the company's official website: <https://paytm.com/>.

Furthermore, Paytm actively disseminates information through its official blog and social media channels, including Facebook, Twitter, and Instagram. These platforms are consistently updated



with the latest insights, news, and updates about our offerings, ensuring that consumers remain well-informed and engaged with our evolving suite of products and services.

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

We uphold continuous engagement with our customers across a wide range of communication channels such as press statements, blogs, social media campaigns, and our official website. This effort aims not only to impart knowledge and instill vigilance against cyber fraud but also to furnish them with up-to-date insights into the latest developments within the industry. By leveraging these platforms, we strengthen our commitment to ensuring the safety and awareness of our customers in an ever-evolving digital landscape.

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

We proactively alert users to any potential interruptions, ensuring they receive timely updates in a convenient manner. Customers receive immediate notifications directly through SMS on their mobile devices, providing real-time updates on service statuses. Additionally, through the Paytm app, we send out push notifications to give users instant news about service conditions. Moreover, Paytm's dedicated customer service teams, including our social media teams, are always on standby to address user queries and provide personalized assistance via phone, ensuring direct and personal communication whenever needed. Besides, during unplanned downtime, we categorize the issues based on severity and trigger notifications accordingly. <https://business.paytm.com/docs/v1/downtime-notification/>

**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. 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)**

We acknowledge the significance of furnishing our customers with sufficient, clear and transparent information. The company follows local guidelines of BIS & Legal Metrology Norms on their Product MRP & Packaging. All our products provide customers with complete and pertinent information essential for making informed decisions.

We regularly solicit feedback from our customers on a quarterly basis, carefully reviewing any complaints or grievances to conduct root cause analyses. This process not only allows us to address issues promptly but also presents opportunities for service enhancements. Our research initiatives encompass a range of methodologies, including surveys, in-depth interviews with consumers, customers, and key ecosystem stakeholders, as well as consultations with industry experts. Complementing our primary research, we leverage quantitative market data sourced from reputed portals and industry publications. Furthermore, we conduct Annual Customer Surveys to identify key drivers influencing overall satisfaction, fostering teamwork to address any identified gaps and drive improvements.

# Independent Assurance Statement on Business Responsibility & Sustainability Reporting

To  
 The Board of Directors,  
 One 97 Communications Limited,  
 One Skymark, Tower-D,  
 Plot No. H-10B, Sector-98,  
 Noida - 201304, India

One 97 Communications Limited (Paytm) (hereafter 'Paytm') engaged TUV India Private Limited (TUVI) to conduct independent external assurance of Business Responsibility and Sustainability Report (herein after abbreviated as "BRSR") following the National Guidelines on Responsible Business Conduct (NGRBC), SEBI circular: [SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122](#), dated 12/07/2024 for the reporting period April 01, 2023 to March 31, 2024. This assurance engagement was conducted in reference with BRSR and ISAE 3000 (Revised) requirements. This assurance statement is intended solely for the information and use of 'Paytm' and is not to be used by anyone other than 'Paytm'.

## Management's Responsibility

Paytm developed the BRSR and is responsible for the collection, analysis, authenticity of data and disclosure of the information presented in the BRSR (web-based and print), including website maintenance, integrity, and for ensuring

its quality and accuracy with reference to the criteria stated in the BRSR, such that it's free of misstatements (intentional, unintentional, qualitative or quantitative, including omissions). 'Paytm' will be responsible for providing complete and true information and data. Further, 'Paytm' is responsible for archiving and reproducing the disclosed data to the stakeholders and regulators upon request.

## Scope and Boundary

The scope of work includes the assurance of the following non-financial performance indicators/ attributes. In particular, the assurance engagement included the following:

- i. Review of listed attributes following the Annexure I - Format of BRSR Core submitted by 'Paytm',
- ii. Review of the quality of information,
- iii. Review of evidence (on a random samples) for all 9 attributes and its KPI,

TUVI has verified the below disclosed attributes presented under the BRSR

Attributes	KPI
Green-house gas (GHG) footprint	Total Scope 1 emissions (with breakup by type) - GHG (CO2e) Emission in MT - Direct emissions from organization's owned- or controlled sources Total Scope 2 emissions in MT - Indirect emissions from the generation of energy that is purchased from a utility provider

Attributes	KPI
	GHG Emission Intensity (Scope 1+2), Total Scope 1 and Scope 2 emissions (MT) / Total Revenue from Operations adjusted for PPP
	GHG Emission Intensity (Scope 1+2), (Total Scope 1 and Scope 2 emissions (MT) / To be declared)
Water footprint	Total water consumption (in kL) Water consumption intensity - kL / Total Revenue from Operations adjusted for PPP Water consumption intensity - kL /To be declared)
Energy footprint	Water Discharge by destination and levels of Treatment (kL) Total energy consumed in GJ % of energy consumed from renewable sources - In % terms Energy intensity -GJ/ Rupee adjusted for PPP Energy intensity -GJ/To be declared)
Embracing circularity - details related to waste management by the entity	Plastic waste (A) (MT) E-waste (B) (MT) Dry Waste (Tissue Paper, HRT/JRT/Toilet role/Face tissue/ Paper Cups, etc.) (C) (MT) Battery waste (D) (MT) Wet Waste (Food Waste, Tea Bags & Other Cafeteria Waste etc.) (E) Budling materials/ furniture scrap / carpets, broken cupboards, keyboard holder, project leftover like false ceiling, workstation fitouts, plywood, wood, glass mirror etc (F) (MT) Total waste generated (A + B + C + D + E + F) (MT) Waste intensity <ul style="list-style-type: none"> <li>• MT / Rupee adjusted for PPP</li> <li>• MT /To be declared)</li> </ul> Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (MT) Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (Intensity) ✓ kg of Waste Recycled Recovered /Total Waste generated For each category of waste generated, total waste disposed by nature of disposal method (MT) For each category of waste generated, total waste disposed by nature of disposal method (Intensity) ✓ kg of Waste Recycled Recovered /Total Waste generated
Enhancing Employee Wellbeing and Safety	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the co - In % terms Details of safety related incidents for employees and workers (including contract-workforce e.g. workers in the company’s construction sites) 1) Number of Permanent Disabilities 2) Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) 3) No. of fatalities

Attributes	KPI	
Enabling Gender Diversity in Business	Gross wages paid to females as % of wages paid - In % terms Complaints on POSH	<ol style="list-style-type: none"> <li>1) Total Complaints on Sexual Harassment (POSH) reported</li> <li>2) Complaints on POSH as a % of female employees / workers</li> <li>3) Complaints on POSH upheld</li> </ol>
Enabling Inclusive Development	Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India - In % terms – As % of total purchases by value Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non- permanent /on contract) as % of total wage cost - In % terms – As % of total wage cost	
Fairness in Engaging with Customers and Suppliers	Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events - In % terms Number of days of accounts payable - (Accounts payable *365) / Cost of goods/ services procured	
Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties	<ol style="list-style-type: none"> <li>1) Purchases from trading houses as % of total purchases</li> <li>2) Number of trading houses where purchases are made from</li> <li>3) Purchases from top 10 trading houses as % of total purchases from trading houses</li> </ol> <ol style="list-style-type: none"> <li>1) Sales to dealers / distributors as % of total sales</li> <li>2) Number of dealers / distributors to whom sales are made</li> <li>3) Sales to top 10 dealers / distributors as % of total sales to dealers / distributors</li> </ol> <p>Share of RPTs (as respective %age) in -</p> <ul style="list-style-type: none"> <li>• Purchases</li> <li>• Sales</li> <li>• Loans &amp; advances</li> <li>• Investments</li> </ul>

The reporting boundaries for the above attributes include 20 Regional offices and 50 Fleet hub offices spread across India. An on-site verification was conducted at Paytm Corporate Office, One Skymark, Tower-D, Plot No. H-10B, Sector-98, Noida - 201304, India for dates 22nd May 2024 to 25th May 2024.

### Onsite Verification

1. One 97 Communications Limited ("Paytm"), One Skymark, Tower-D, Plot No. H-10B, Sector-98, Noida - 201304, India for dates 22nd May 2024 to 25th May 2024.

The assurance activities were carried out together with a desk review as per reporting boundary.

### Limitations

TUVI did not perform any assurance procedures on the prospective information disclosed in the Report, including targets, expectations, and ambitions. Consequently, TUVI draws no conclusion on the prospective information. During the assurance process, TUVI did not come across any limitation to the agreed scope of the assurance engagement. TUVI did not verify any ESG goals and claim through this assignment. TUVI disclaims any liability or co-responsibility 1) for any decision a person or an entity would make based on this assurance statement and 2) for any damages in case of erroneous data is reported. While, TUVI verified data with maximum sample desired for limited level of assurance; the responsibility for the authenticity of submitted data entirely lies with 'Paytm'. TUVI has taken reference of the financial figures from the audited financial statements. 'Paytm' will be responsible for the appropriate application of the financial data. The application of this assurance statement is limited w.r.t *SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated Jul 12, 2023*).

### Water

1. The raw water consumption at the 50 fleet offices is estimated based on the studies provided by the per day per employee water consumption as per CWGA studies.

### Waste

1. The waste data was not monitored for the 50 fleet offices; thus, the reported waste values are limited to the 20 regional offices.
2. The generated non-hazardous waste in the 20 regional offices is handed over to the land lord. Thus, traceability to disposal method is missing. Thus, all generated non-hazardous waste is thus conservatively assumed to be landfilled.

### Our Responsibility

TUVI's responsibility in relation to this engagement is to perform a limited level of assurance and to express a conclusion based on the work performed. Our engagement did not include an assessment of the adequacy or the effectiveness of Paytm's strategy, management of ESG-related issues or the sufficiency of the Report against BRSR reporting principles, other than those mentioned in the scope of the assurance. TUVI's responsibility regarding this verification is in reference to the agreed scope of work, which includes assurance of non-financial quantitative and qualitative information ([09 attributes as per Annexure I - Format of BRSR Core](#)) disclosed by 'Paytm'. Reporting Organization is responsible for archiving the related data for a reasonable time period. TUVI is responsible for

- i. Planning to obtain the limited assurance for BRSR attributes so that it is free from material misstatement,
- ii. Forming an independent opinion, based on the sampled evidence,
- iii. Reporting the opinion to The Board of Directors of 'Paytm'.

This assurance statement is prepared by considering that the data and information presented by 'Paytm' are free from material misstatement.

## Verification Methodology

During the assurance engagement, TUVI adopted a risk-based approach, focusing on verification efforts with respect to disclosures. TUVI has verified the disclosures and assessed the robustness of the underlying data management system, information flows, and controls. In doing so:

- a) TUVI examined and reviewed the documents, data, and other information made available by Paytm for [09 attributes as per Annexure I - Format of BRSR Core](#) (non-financial disclosures) followed by taking reference of the financial figures from the audited financial statement,
- b) TUVI conducted interviews with key representatives, including data owners and decision-makers from different functions of 'Paytm',
- c) TUVI performed sample-based reviews of the mechanisms for implementing the sustainability-related policies and data management (qualitative and quantitative),
- d) TUVI reviewed the adherence to reporting requirements of BRSR Core framework.

## Opportunities for Improvement

The following are the opportunities for improvement reported to 'Paytm'. However, they are generally consistent with Paytm management's objectives and programs. Paytm already identified below topics and

Assurance team endorse the same to achieve the Sustainable Goals of organization:

- a) The Reporting organization can develop the SOP for reporting the 09 CORE attributes,
- b) The reporting organization can perform the internal audits of the sustainability data on periodic basis,
- c) The reporting organization can develop the traceable method for diversion of its non-Hazardous Waste from the landfill,
- d) The reporting organization can perform the water audits and evaluate the method to monitor the raw water consumption at the 50 fleet offices,
- e) The reporting organization can develop the method to capture the waste related data for the 50 fleet offices.

## Conflict of Interest

In the context of BRSR requirements set by SEBI, addressing conflict of interest is crucial to maintain high integrity and independence of assurance engagements. As per SEBI guidelines, assurance providers need to disclose any potential conflict of interest that could compromise the independence or neutrality of their assessments. TUVI diligently identifies any relationships, affiliations, or financial interests that could potentially cause conflict of interest. We proactively implement measures to mitigate or manage these conflicts, ensuring independence and impartiality in our assurance engagements. We provide clear and transparent disclosures about any identified conflicts of interest in our assurance statement. We recognize that failure to address conflict of interest adequately could undermine the



credibility of the assurance process and the reliability of the reported information. Therefore, we strictly adhere to SEBI guidelines and take necessary measures to avoid, disclose, or mitigate conflicts of interest effectively.

## Our Conclusion

In our opinion, based on the scope of this assurance engagement, the disclosures on BRSR Core KPI described in the BRSR report along with the referenced information provides a fair representation of the 9 attributes, and meets the general content and quality requirements of the BRSR. TUVI confirms its competency to conduct the assurance engagement for the BRSR as per SEBI guidelines. Our team possesses expertise in ESG verification, assurance methodologies, and regulatory frameworks. We ensure independence, employ robust methodologies, and maintain continuous improvement to deliver reliable assessments.

Disclosures: TUVI is of the opinion that the reported disclosures generally meet the BRSR requirements. 'Paytm' refers to General Disclosure to report contextual information about Paytm, while the Management & Process disclose the management approach for each indicator ([09 attributes as per Annexure I - Format of BRSR Core](#)).

### 'Paytm' BRSR complies with the below requirements

1. Governance, leadership and oversight: The messages of top management, the business model to promote inclusive growth and equitable development, action and strategies, focus on services, risk management, protection and restoration of environment, and priorities are disclosed appropriately.
2. Connectivity of information: Paytm discloses [09 attributes as per Annexure I - Format of BRSR Core](#) and their inter-relatedness and dependencies with factors that affect the organization's ability to create value over time.
3. Stakeholder responsiveness: The Report covers mechanisms of communication with key stakeholders to identify major concerns to derive and prioritize the short, medium and long-term strategies. The Report provides insights into the organization's relationships (nature and quality) with its key stakeholders. In addition, the Report provides a fair representation of the extent to which the organization understands, takes into account and responds to the legitimate needs and interests of key stakeholders.
4. Materiality: The material issues within 9 attributes and corresponding KPI as per BRSR requirement are reported properly.
5. Conciseness: The Report reproduces the requisite information and communicates clear information in as few words as possible. The disclosures are expressed briefly and to the point sentences, graphs, pictorial, tabular representation is applied. At the same time, due care is taken to maintain continuity of information flow in the BRSR.
6. Reliability and completeness: Paytm has established internal data aggregation and evaluation systems to derive the performance. Paytm confirms that, all data provided to TUVI, has been passed through QA/QC function. The majority of the data and information was verified by TUVI's assurance team (on sample basis) during the BRSR verification and found to be fairly

accurate. All data, is reported transparently, in a neutral tone and without material error.

7. Consistency and comparability: The information presented in the BRSR is on yearly basis. and founds reliable and complete manner. Thus, the principle of consistency and comparability is established.

**Independence and Code of Conduct:** TUVI follows IESBA (International Ethics Standards Board for Accountants) Code which, adopts a threats and safeguards approach to independence. We recognize the importance of maintaining independence in our engagements and actively manage threats such as self-interest, self-review, advocacy, and familiarity. The assessment team was safeguarded from any type of intimidation. By adhering to these principles, we uphold the trust and confidence of our clients and stakeholders. In line with the requirements of the SEBI [circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122, dated 12/07/2023](#), TUVI confirms that there is no conflict of interest with Paytm. TUVI solely focuses on delivering verification and assurance services and does not engage in the sale of service or the provision of any non-audit/non-assurance services, including consulting.

**Quality control:** The assurance team complies with quality control standards, ensuring that the engagement partner possesses

requisite expertise and the assigned team collectively has the necessary competence to perform engagements in reference with standards and regulations. Assurance team follows the fundamental principles of integrity, objectivity, professional competence, due care, confidentiality and professional behaviour. In accordance with International Standard on Quality Control, TUVI maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

## Our Assurance Team and Independence

TUVI is an independent, neutral third-party providing ESG Assurance services with qualified environmental and social specialists. TUVI states its independence and impartiality and confirms that there is "no conflict of interest" with regard to this assurance engagement. In the reporting year, TUVI did not work with Paytm on any engagement that could compromise the independence or impartiality of our findings, conclusions, and observations. TUVI was not involved in the preparation of any content or data included in the BRSR, with the exception of this assurance statement. TUVI maintains complete impartiality towards any individuals interviewed during the assurance engagement.

For and on behalf of TUV India Private Limited

For and on behalf of TUV India Private Limited



Manojkumar Borekar  
Product Head – Sustainability Assurance Service  
TUV India Private Limited



Date: 12/06/2024  
Place: Mumbai, India  
Project Reference No: 8122651189