

TRANSUNION CIBIL LIMITED
Corporate Social Responsibility (CSR) Policy

Document Name: TU CIBIL – Corporate Social Responsibility (CSR) Policy

Abstract: This policy encompasses TransUnion CIBIL Limited's (**the Company's**) philosophy towards corporate social responsibility, lays down the guidelines and mechanism for undertaking socially relevant programs for welfare and sustainable development of the community at large and complying with all the local regulations in that regard, is titled as the '**CSR Policy of TransUnion CIBIL Limited.**'

VERSION HISTORY

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1.10	03 May 2024	Change in the CSR Committee Composition and in the Annexure	30 May 2024
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1.12	23 May 2025	Introduction of CSR Management Committee	05 June 2025
1.13	5 th January 2026	Annual Review	29 th January 2026
1.14	21 st April 2026	Change in Policy Owner	20 th May 2026

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1. Introduction and Background

TransUnion CIBIL is India's leading credit information company and maintains one of the largest repositories of credit information globally. We have over 7000 members—including all leading banks, financial institutions, non-banking financial companies and housing finance companies— and maintain more than 2.5billion credit records of individuals and businesses.

Our mission is to create information solutions that enable businesses to grow and give consumers faster, cheaper access to credit and other services. We create value for our members by helping them manage risk and devise appropriate lending strategies to reduce costs and increase portfolio profitability. With comprehensive, reliable information on consumer and commercial borrowers, they can make sound credit decisions about individuals and businesses. Through the power of information, TransUnion CIBIL is working to support our members drive credit penetration and financial inclusion for building a stronger economy.

2. CSR Vision and Mission

Corporate Social Responsibility (CSR) covers the entire process by which an organization approaches, defines, and develops its relationships with stakeholders for the common good and demonstrates its commitment in this regard by the adoption of appropriate strategies and projects. Thus, CSR is not charity or mere donations but a way of going beyond business as usual, creating shared value and contributing to social and environmental good.

The Company's corporate values of Sustainability, Trust and Integrity, and Fairness are guidelines for all the actions. The core value of Sustainability is aligned to taking "utmost care of society" by creating awareness about the less privileged and encouraging the practice of "Giving Back." It is keeping this background in mind that the objectives of the Company's CSR Policy are framed:

- To create self-sustained improvement in the life of the underprivileged by facilitating continued education through financial aid and life skills education
- To empower women and youth through financial independence
- To encourage employees to contribute in terms of monetary and/or effort/time options

CSR Vision

Enriching lives by helping promote education, vocational skills and enable access to economic opportunities, environment conservation and community development along with holistic health and well-being of the society.

CSR Mission

Company's mission is to help foster the socio-economic development and holistic well-being of the underprivileged communities in India. In order to action our philosophy of "Giving Back," we are committed to execute a series of sustainable interventions that promote primary-professional education and vocational training towards creating economic opportunities, environment conservation and community development and support programmes for improving community health to advance the quality of lives.

All the Company's CSR activities will need to be

- Meaningful
- Connected to organizational values
- Able to create opportunities for effort/time voluntary options

The 3 Cs of the Company's CSR are

- Clarity
- Commitment
- Contribution

3. Objectives of the Policy

TransUnion CIBIL Limited has embarked upon the process of institutionalizing its commitment at being socially responsible with an aim of sustainable development of society. The purpose of this Policy is to define the Company's vision, guiding principles, governance structures, strategy, and programmes for its corporate social responsibility efforts.

4. Applicability and Scope

This Policy has been formulated in consonance with Section 135 of Companies Act, 2013 (Act) on CSR and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (CSR Rules) as notified by the Ministry of Corporate Affairs in 2014 and the rules/circulars/amendments framed therein or as modified from time to time by the Ministry of Corporate Affairs. This Policy shall apply to all CSR projects/ programmes undertaken by the Company in India as per Schedule VII of the Act. This Policy shall be applicable to the Company including all its divisions, and all the employees.

This Policy will serve as a guiding document to help identify, execute, and monitor CSR projects/ programmes in keeping with the spirit of the Policy. This Policy would function as a guiding mechanism for the Company's CSR activities and enable adherence to laws, ethical standards, and international practices in this regard.

5. CSR Budget

TransUnion CIBIL Limited shall spend, in every fiscal year, at least 2% of the average net profit made during the immediately preceding three financial years or such amount as may be determined from time to time by the Company on its CSR projects/ programmes.

Net profit shall mean profit before tax as per books of accounts and shall not include (i) profits arising from branches outside India and (ii) any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act.

6. CSR Governance Structure and Roles and Responsibilities

The Company has put in place the following governance structure to ensure that this Policy is implemented and monitored effectively. The roles and responsibilities are defined at each governance level:

6.1 Board of Directors

The Company's Board of Directors will be responsible for following activities:

- Approve the CSR policy of the Company, CSR projects/ programmes/ activities to be undertaken by the Company and modalities of operation and the budget for the projects/ programmes/ activities.
- Ensure that the projects/ programmes/ activities included in CSR Policy of the Company are undertaken by the Company, although primary responsibility lies with the CSR Committee.

- Ensure that the Company spends, in every fiscal year, at least two percent of the average net profits made during the immediately preceding three financial years or such amount as may be determined from time to time by the Company, in pursuance of this Policy.
- Satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer (or the person responsible for financial management) shall certify to the effect.
- Monitor the implementation of an ongoing project i.e. a multi-year project undertaken by the Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which such project was commenced, if any, with reference to the approved timelines and year-wise allocation and to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

6.2 CSR Committee

The CSR Committee will have at least three members from the Board of Directors, out of which at least one director shall be an independent director. The CSR Committee will be responsible for driving the Company's CSR initiatives. The CSR Committee will give strategic direction, finalize, and approve annual goals of the CSR projects/ programmes selected, allocate budgets on a yearly basis and monitor progress.

The CSR Committee will be specifically responsible for the following:

- Recommend the CSR Policy to the Board for approval which shall indicate the activities to be undertaken by the Company as specified in Schedule VII;
- Formulate and recommend to the Board, an annual action plan, which shall include the following, namely: -
 - a) The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - b) The manner of execution of such projects or programmes;
 - c) The modalities of utilization of funds and implementation schedules for the projects or programmes;
 - d) Monitoring and reporting mechanism for the projects or programmes;
 - e) Details of need and impact assessment, if any, for the projects undertaken by the Company
- Recommend to the Board, any alteration to the aforesaid annual action plan;
- Recommend the amount of expenditure to be incurred on the CSR activities to the Board for approval;
- Ensure that the CSR Policy of the Company is monitored on a regular basis and is updated from time to time for any change or enhancement in scope and the same is recommended to the Board for approval;
- Monitoring the progress of the activities being undertaken under the policy;
- Approve the design of the CSR activities and the budgets proposed and recommend to the Board for approval;
- Oversee the overall implementation and reporting of the CSR projects/ programmes as approved by the Board.

The members of the CSR Committee are:

Ms. Melanie Zimmerman	Chairperson
Mr. David Gilbert	Member
Mr. Kannan Narayanan Srinivasa	Member
Mr. Sanjay Prasad	Member

6.3 CSR Management Committee

The Company has constituted a CSR Management Committee at the management level, chaired by the Managing Director & CEO and comprising senior management executives of the Company. The CSR Management Committee supports the Board level CSR Committee by overseeing the operational implementation and internal monitoring of CSR activities approved by the CSR Committee and by undertaking such other functions as approved by the CSR Committee / Board, including the following:

- a) To provide implementation-level guidance and inputs on the execution strategy of ongoing and proposed CSR projects or programmes, and share such inputs with the CSR Committee for its consideration;
- b) To identify and recommend priority focus areas or thematic domains to the CSR Committee based on emerging social and environmental needs in line with Schedule VII of the Companies Act 2013.
- c) "To evaluate CSR projects/ programmes recommended by the CSR Team basis the proposals reviewed or otherwise recommended by the CSR Team and due diligence of NGOs/ Agencies carried out by the CSR Team, and to recommend shortlisted projects/ programmes to the CSR Committee".
- d) To review the CSR fund disbursement and status on fund disbursement and ensure the allocated funds are utilized effectively and the projects / programmes are on track for complete utilization of funds by the year end; and
- e) To engage with project/ programme implementation teams, discuss key issues, implementation challenges or risks, and propose solutions or alternatives for the CSR Committee's consideration if any.

6.4 CSR Team

The CSR manager will be responsible for ground level implementation of all CSR projects/ programmes. He / She will be responsible for following:

- a) Be the first point of contact for effective project/ programme implementation on the ground
- b) Setting guidelines and framework of CSR project/ programme
- c) Recommend projects/ programmes, modality of operations and monitoring mechanism
- d) Review proposals submitted by the NGOs / Agencies
- e) Ensure that the programmes/ projects proposed are in line with Schedule VII of The Companies Act, 2013
- f) Ensure impactful CSR fund utilization aligning with Company's CSR focus
- g) End to end CSR implementation starting from project/ programme identification, partner identification, due diligence of NGO partners/ implementation agency(ies)/ service providers, creating operating model, active monitoring and reporting wherever applicable.
- h) Active monitoring of funds disbursed to partners by field visit and verification, wherever applicable as per the nature of the project/ programme
- i) Ensuring FUC (Fund Utilization Certificate), receipts and & project/ programme reports, wherever applicable from the respective partners
- j) Carrying employee volunteering initiatives.

7. Modalities of Implementation

The Company will implement the CSR projects/ programmes either through itself or through identified suitable NGO partners/ implementation agency(ies)/ service providers as may be permitted under the Act and the rules/circulars framed or issued thereunder from time to time.

With effect from April 01, 2021, NGO partners must be registered with the Central Government by filing the form CSR 1 of the CSR Rules and must meet such other requirements as may be prescribed under the Act and the CSR Rules. While availing services of consultants or any other organizations for a CSR project/ programme, the Company will seek proposals from various consultants and organizations and will then make a final decision which are critical to the success of that CSR project/ programme.

The Company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are able to report separately on such projects or programmes in accordance with the CSR Rules.

As creating socially conscious and contributing citizens is the underlying objective of the Company's CSR agenda, all Company employees are encouraged to take "One Man-Day (8 hours)" in a fiscal year during office hours to contribute time and efforts to volunteer at any NGO aligned to the Corporate Social Responsibility themes with approval of their respective HODs.

The Company may also spend the CSR amount for creation or acquisition of a capital asset which shall be held by: (a) a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number; or (b) beneficiaries of the concerned CSR project, in the form of self-help groups, collectives, entities; or (c) a public authority.

If the Company fails to spend the CSR amount, the Company shall transfer the unspent amount to a fund specified in Schedule VII of the Act, within a period of six months of the expiry of the fiscal year, unless the unspent amount relates to any ongoing project. In the event the unspent amount relates to an ongoing project, the unspent amount shall be transferred to Unspent CSR Account within a period of thirty days from the end of the financial year and shall be spent in pursuance of its obligations towards this Policy within a period of three financial years from the date of such transfer, failing which, the Company shall transfer the same to a fund specified in Schedule VII of the Act, within a period of thirty days from the date of completion of the third financial year.

In the event the Company spends an amount in excess of the requirements under the Act, the Company may set off such excess amount against the requirement to spend the CSR amount up to immediate succeeding three financial years subject to the conditions that (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any; and (ii) the Board passes a resolution to this effect.

The surplus arising out of the CSR projects or programmes or activities shall not form part of the business profit of the Company and shall be ploughed back into the same project or programme or shall be transferred to the Unspent CSR Account and spent in pursuance of this Policy and annual action plan of the Company or transfer such surplus amount to a fund specified in Schedule VII of the Act, within a period of six months of the expiry of the financial year.

8. Project/ Programme Implementation Guidelines

The Company will aim to follow the below guidelines in executing CSR projects/ programmes:

8.1 Project/ Programme Development

Every project/ programme must develop a proposal including information such as project/ programme description and duration, information about the partner organization including proof of legal status, and amount of funding or other resources required. The Company may on a best-efforts basis consider any projects/ programmes run internationally as well as capacity building for the CSR team of the Company. The Company may evaluate designing, monitoring, and evaluation of the same from an Indian context.

However, always the Company shall only undertake projects/ programmes as are approved under the Schedule VII of the Companies Act, 2013.

8.2 Project/ Programme Approval

The project/ programme details should be submitted to the CSR Management Committee for initial review and internal evaluation, following which they shall be submitted to the CSR Committee along with inputs/recommendations of the CSR Management Committee) for their consideration and evaluation and thereafter to the Board for their approval. The projects/ programmes will be implemented after receiving approval from the CSR Committee.

8.3 Project/ Programme Implementation

The total costs for all projects/programmes will be within the CSR budget as per the mandate or as approved by Board of Directors Further, the administrative overheads incurred by the Company in a financial year in furtherance of its CSR activities shall be included in the total costs for all projects and programmes. These administrative overheads shall not exceed 5% of the overall CSR expenditure in accordance with the CSR Rules. The expression “administrative overheads” shall have the meaning as prescribed under the CSR Rules.

8.4 Project/ Programme Criteria

All CSR interventions will be undertaken in project or programme mode and will relate to the items specified in Schedule VII of the Companies Act, 2013 or through such activities as may be permitted under the Companies Act, 2013 and the rules framed therein and various circulars/notifications issued thereunder or as modified from time to time.

8.5 Project/ Programme Location

The Company shall give preference to the local areas or areas around it where it operates, for spending the amount earmarked for CSR activities. The CSR Committee may also identify such other areas, as it may deem fit, and recommend to the Board for undertaking CSR activities.

9. Monitoring and Reporting Framework and Communication

The CSR Committee shall meet thrice in a financial year or as and when the need arises to review and guide the CSR activities of the Company. They shall meet to monitor the progress of CSR projects/ programmes, CSR spending, and review if any changes are required. The amount spent on CSR activities by the Company shall be subject to an internal audit, as determined by the CSR Committee, to ensure that the amount of spending aligns with applicable requirements under the Act, CSR Rules and this CSR Policy. As per the Annual Calendar of Policies approved by the Board, the CSR Committee

will also review the CSR policy to discuss if any changes are required in it. However, it may also meet at an early period if necessitated by changes in the applicable law or in case of changes to a particular project/ programme or review of CSR policy is required.

The Company may undertake an assessment, as and when needed, to evaluate the social impact of its CSR projects/ programmes on the communities. Without prejudice to the foregoing sentence, in the event the Company is having an average CSR obligation of ten crore rupees or more in pursuance of Section 135(5) of the Act, in the three immediately preceding financial years, the Company shall undertake an impact assessment of its CSR projects (i) having outlays of one crore rupees or more; and (ii) which have been completed not less than one year before undertaking the impact assessment, through an independent agency, in accordance with the Act and the CSR Rules. The Company shall place the impact assessment report before the Board and shall annex the report to the annual report on CSR. This will also help the Company to obtain learnings which will help increase project/ programme efficiency and scalability.

The Company will incorporate the details of CSR activities along with the financial spends in the annual report of the Company in the manner as prescribed under the Act and the CSR Rules. The CSR activities will also be reflected in the annual accounts of the Company under the head 'Expenditure under CSR Activities' and will be mentioned in the Director's report. The CSR Committee will present quarterly reports at the Board-level CSR Committee's quarterly meetings. All regulatory filings prescribed under the Companies Act, 2013 and the rules/circulars/amendments framed therein or as modified shall be filed with the Ministry of Corporate Affairs from time to time

CSR related accounts should be maintained in accordance with applicable accounting standards and guidance/notifications issued by the Ministry of Corporate Affairs or other prescribed regulatory authorities from time to time.

The Company will be communicating its CSR efforts to all its employees and external stakeholders through its own website, or other appropriate dissemination channels, this will be reviewed annually. The composition of the CSR Committee, CSR Policy of TransUnion CIBIL Limited and projects/ programmes approved by the Board will also be uploaded on the website of the Company.

10. Exclusions

The following activities shall not form part of the Company's CSR activities:

- Activities which are undertaken in pursuance of normal course of business of the Company;
- Any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
- Contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- Activities benefitting employees of the Company as defined in clause (k) of section 2 of the Code on Wages, 2019;
- Activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services;
- Activities carried out for fulfilment of any other statutory obligations under any law in force in India;
- Such other activities, prohibited or not eligible to be undertaken as CSR activities, as may be prescribed under the Act and/or the CSR Rules.

11. Exceptions/deviations

All exceptions and deviations to this Policy shall be approved by CSR Committee.

12. Policy Owner

The Chief Human Resources Officer (CHRO) is the process owner of this Policy.

13. Amendments

Based on the recommendation of the CSR Committee, the Company can modify this Policy at any time to the extent deemed necessary by the Company, from time to time, including to maintain compliance with local laws.

14. Feedback Mechanism

The Company shall endeavor that the benefits of its CSR activities reach its intended recipients and beneficiaries in a fair and transparent manner. The Company shall make available the contact details of the designated person(s) / team responsible for handling Feedback on CSR Projects on the CSR page of the Company's website, to whom the feedback can be addressed by beneficiaries, including those received by implementing agencies from the beneficiaries.

Annexure: Areas of CSR interventions, objectives, activities, and Schedule VII category

Enumerated below are the cause areas under which the Company will implement its CSR projects/ programmes based on the recommendation of the CSR Committee. The Company may undertake CSR activities other than the activities mentioned below in line with Schedule VII of the Act and the rules/ circulars/ amendments framed therein or as modified from time to time by the Ministry of Corporate Affairs and as approved by the CSR Committee from time to time including any CSR activities or expenditure permitted to be undertaken under or pursuant to any scheme, programme, or initiative introduced by the Central or State Government towards social and economic betterment such as Prime Minister Internship Scheme.

CSR Focus (Initiative)	Objectives	Schedule VII Category
Programme 'Shiksha': Imparting Education	- Providing resources for quality primary and secondary education to support children in disadvantaged communities. - Enabling schools to provide socioemotional and ethical as well as holistic development skills	i). "Eradicating hunger, poverty, and malnutrition, promoting healthcare including preventive healthcare and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water." ii) "Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects" iii) "Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;" iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water.
Programme 'Udaan': Scholarship Programmes	- Supporting students having limited resources to pursue their dreams of professional and vocational education by awarding scholarships. - Further helping the students become independent and capable of earning a livelihood.	
Programme 'Aarogya': Promoting Healthcare	Providing healthcare support and ensuring timely medical treatments to the needy patients/ support for equipment/ health infrastructure.	
Programme 'Udyog': Skill Development Training	Empowering community members by imparting vocational skills	
Programme 'Paryavaran Sanjeevani': Environment Conservation/ Sustainability	Environment Conservation/ Sustainability projects.	
