

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

OF

NAVI LIMITED (FORMERLY KNOWN AS NAVI TECHNOLOGIES LIMITED)

Version Number	6
Date of Policy Adoption	January 21, 2021
Date of Review/Amendment of Policy	June 15, 2026
Policy owner	Company Secretary
Approved by	Board of Directors
Periodicity of Review	Once in Three Years

<u>Date of Review/ Amendment</u>	<u>Particulars</u>	<u>Next date of review</u>
January 21, 2021	Initial Adoption of the Policy	January 20, 2022
March 06, 2022	Adoption of updated Policy to align the Policy with the requirements of a public company.	March 05, 2023
February 26, 2024	Adoption of updated Policy by removing references to SEBI regulations	February 25, 2025
June 16, 2025	No Changes	No later than June 15, 2026
June 15, 2026	Annual review of the Policy, revision of the review frequency, amendment to the provisions relating to implementation of CSR activities through Zero Coupon Zero Principal Instruments, inclusion of Clause (xiii) in Annexure A, and incorporation of other minor consequential amendments	No later than June 14, 2029

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

INTRODUCTION

At Navi Limited (formerly known as Navi Technologies Limited) (“Navi”), our mission is to build financial services that are simple, affordable, and accessible. We consider Corporate Social Responsibility (“CSR”) not just as a statutory requirement for the organisation, but a logical extension of our core values.

CSR VISION

Contribute to the betterment of underprivileged sections of society by investing in and empowering them.

CSR MISSION

Leverage Navi’s areas of expertise and reach to make a measurable impact on sustainable socio-economic development of underprivileged communities.

CSR OBJECTIVE

- (i) The Company is committed to all its stakeholders to conduct business in a manner that is transparent and ethical.
- (ii) The Company understands that it is a part of a larger ecosystem and that it is its social responsibility to give back to the said ecosystem.
- (iii) A robust CSR program will generate community goodwill for Navi and help reinforce a positive and socially responsible image for the Company.

CSR COMMITTEE

The Board of Directors (“Board”) may constitute a CSR Committee (“Committee”) as per the provisions of Section 135 of the Companies Act, 2013 (“Act”).

BOARD'S RESPONSIBILITIES

The Board shall ensure that the Company spends, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years

(or, if the company has not completed three financial years, then, the average of net profits during such immediately preceding financial years) in pursuance of this CSR Policy (“Policy”).

Where a CSR Committee is not required to be constituted, the Board of Directors shall discharge all the functions and responsibilities of the CSR Committee in accordance with the provisions of Section 135 of the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014.

TERMS OF REFERENCE OF THE COMMITTEE

The Committee’s terms of reference shall include:

- (i) Formulation of a corporate social responsibility policy to the Board, indicating the activities to be undertaken by the Company in areas or subjects specified in the Companies Act, 2013. The activities should be within the list of permitted activities specified in the Companies Act, 2013 and the rules thereunder;
- (ii) Recommending the amount of expenditure to be incurred, amount to be at least 2% of the average net profit of the Company in the three immediately preceding financial years or where the Company has not completed the period of three financial years since its incorporation, during such immediately preceding financial years;
- (iii) Instituting a transparent monitoring mechanism for implementation of the corporate social responsibility projects or programs or activities undertaken by the Company;
- (iv) Monitoring the corporate social responsibility policy from time to time and issuing necessary directions as required for proper implementation and timely completion of corporate social responsibility programmes;
- (v) Identifying corporate social responsibility policy partners and corporate social responsibility policy programmes;
- (vi) Identifying and appointing the corporate social responsibility team of the Company including corporate social responsibility manager, wherever required; and
- (vii) Performing such other duties and functions as the Board may require the corporate social responsibility committee to undertake to promote the corporate social responsibility activities of the Company or as may be required under applicable laws.

CSR FOCUS AREAS

The Company shall adhere to Schedule VII of the Act read along with Section 135 of the Act as amended from time to time. The Company shall, through its CSR activities, focus on the areas as mentioned in the Schedule VII of the Act as amended from time to time and such other activities as permitted under the Act, applicable regulations as notified from time to time. The activities mentioned in the Schedule VII is annexed to this policy as **Annexure A**.

CSR BUDGET

In every financial year, the Company shall spend at least 2% of the average net profits of the Company made during the three immediately preceding financial years (or, if the company has not completed three financial years then, the average of net profits during such immediately preceding financial years), in pursuance of its CSR Policy.

CSR IMPLEMENTATION

The Committee shall give preference to local areas and areas around it where it operates, while considering new CSR activities. The quantum of estimated donation, investment and/ or expenditure in each activity shall be approved by the Committee.

IMPLEMENTATION AGENCY

The CSR activities of the Company may be undertaken directly by the Company or through such agency (ies) as the Company may deem fit, provided that such agency (ies) meets the eligibility criteria laid down under the applicable laws. The Company may undertake its Corporate Social Responsibility ("CSR") activities through investment in Zero Coupon Zero Principal Instruments ("ZCZP Instruments") issued by eligible Not-for-Profit Organisations in accordance with the provisions of the Companies Act, 2013, the Companies (Corporate Social Responsibility Policy) Rules, 2014, the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, and other applicable laws.

The amount invested through ZCZP Instruments shall not exceed the limit prescribed under applicable law from time to time. CSR projects funded through such instruments shall be implemented by the issuing Not-for-Profit Organisation in accordance with the applicable regulatory requirements, including utilisation of funds, project duration, reporting obligations, and treatment of unspent amounts.

The Company shall ensure compliance with all statutory requirements relating to CSR expenditure through ZCZP Instruments, including any exemptions, disclosures, monitoring, and reporting requirements as may be prescribed under applicable law.

The time period over which a particular programme or project will be executed will depend on the nature of the activity, its extent and objective sought to be achieved by the programme or project.

ANNUAL REPORT TO THE BOARD OF DIRECTORS

The Committee shall report on an annual basis to the Board regarding the CSR activities undertaken by the Company.

CSR ANNUAL ACTION PLAN

The CSR Committee shall decide on the locations for CSR activities and formulate and recommend to the Board for approval a CSR annual action plan, which shall contain all matters which are required under Applicable Law and any other matters as the CSR Committee may deem fit from

time to time.

The Board may modify the annual action plan as per the recommendations of the CSR Committee at any time during the financial year, based on reasonable justification.

IMPACT ASSESSMENT

Impact assessment shall be undertaken by the Company or by recipient or by implementing agency as required by and in the manner set out under Applicable Law, and the impact assessment report(s) shall be placed before the CSR Committee and the Board and shall be disclosed as legally required.

In case, the Company has average CSR obligation of INR 10 crore or more in pursuance of Section 135(5) of the Act, in the three immediately preceding financial years, it shall undertake impact assessment, through an independent agency, of its CSR projects having outlays of ₹ 1 crore or more, and which have been completed not less than one year before undertaking the impact study.

REVIEW OF CSR POLICY

The CSR Policy was initially approved by the Board of Directors on January 21, 2021. The CSR Policy shall be reviewed once in three years, and the necessary amendments shall be duly considered and approved at the meeting of the Board before incorporating the same into the Policy.

Annexure A – Schedule VII of the Companies Act, 2013

(i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.

(v) Protection of national heritage, art and culture including restoration of buildings and sites of

historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts;

(vi) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;

(vii) Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports

(viii) Contribution to the prime minister's national relief fund 8[or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by

the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;

(ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(ix) (b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defence Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

(x) Rural development projects.

(xi) Slum area development.

Explanation.- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

(xii) Disaster management, including relief, rehabilitation, and reconstruction activities.

(xiii) Subscription to zero coupon zero principal instruments on Social Stock Exchange