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CORPORATE SOCIAL RESPONSIBILITY POLICY

COMMON POLICY FRAMEWORK FOR INDIA

For independent adoption by

Fiserv India Private Limited

**NITU
AGARWAL** Digitally signed by
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Serial No	Recommended by	Approved by
1	CSR Committee Members on 22 nd September 2026	Board of Directors on 25 th September 2026

1. Preamble and Purpose

1.1 At Fiserv India Private Limited (“**Company**”), we believe in sustainable and responsible business practices that contribute to the social, economic and environmental development of communities. This Corporate Social Responsibility Policy (“**CSR Policy**”) establishes the principles, governance, focus areas and controls through which the Company will discharge its corporate social responsibility obligations.

1.2 This Policy is framed under section 135 of the Companies Act, 2013, Schedule VII and the Companies (Corporate Social Responsibility Policy) Rules, 2014, in each case as amended, modified or re-enacted from time to time. If this Policy conflicts with applicable law, applicable law shall prevail and the Policy shall be read accordingly.

2. Definitions

2.1 For the purposes of this CSR Policy, the following terms shall have the meanings set forth below unless otherwise specified:

- **Act:** the Companies Act, 2013, including amendments and re-enactments.
- **Administrative Overheads:** expenses incurred by the Company for general management and administration of CSR functions, excluding expenses directly incurred for designing, implementing, monitoring and evaluating a particular CSR project or programme.
- **Annual Action Plan:** the annual plan recommended by the CSR Committee and approved by the Board in accordance with the CSR Rules.
- **Board:** the Board of Directors of the Company.
- **CSR:** the activities described under the CSR Rules and Schedule VII, subject to the exclusions specified by law.
- **CSR Committee:** the Corporate Social Responsibility Committee constituted under section 135, where applicable. Where section 135(9) applies, references to the CSR Committee shall be read as references to the Board.
- **CSR Expenditure:** eligible expenditure incurred in furtherance of approved CSR activities in accordance with the Act and CSR Rules.
- **CSR Rules:** the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended.
- **Implementing Agency:** an entity, eligible under rule 4 of the CSR Rules and, where required, registered with the Central Government through Form CSR-1.
- **Net Profit:** net profit determined in accordance with section 135, section 198 and the CSR Rules.
- **Ongoing Project:** a multi-year project meeting the definition and conditions prescribed in the CSR Rules.
- **Unspent CSR Account:** the special bank account opened for an applicable financial year under section 135(6).

3. Scope, Applicability and Guiding Principles

3.1 This Policy applies to all CSR activities undertaken by the Company in India.

3.2 CSR activities shall relate to the areas or subjects in Schedule VII and shall be interpreted liberally in furtherance of their statutory purpose.

3.3 The Company shall give preference to local areas and areas around its operations while recognizing that CSR programmes may be undertaken elsewhere in India based on assessed need and impact.

3.4 CSR shall be governed by integrity, inclusion, measurable social value, appropriate due diligence, sound financial controls, transparency and accountability.

4. Activities that Do Not Qualify as CSR

4.1 The following shall not be treated as CSR expenditure, except to the extent expressly permitted by applicable law:

- Activities undertaken in the normal course of business of the Company;
- Activities undertaken outside India, other than any legally permitted expenditure for training Indian sports personnel representing a State or Union Territory at national level or India at international level;
- Contributions, directly or indirectly, to any political party under section 182 of the Act;
- Activities that benefit only employees of the Company and their families;
- Sponsorship activities undertaken to derive marketing benefits for the Company's products or services;
- Activities undertaken to fulfil any other statutory obligation under any law in force in India.

5. CSR Focus Areas

5.1 Subject to Board approval through the Annual Action Plan, the Company may undertake activities within Schedule VII, including:

- **Health, hunger and sanitation:** Eradicating hunger, poverty and malnutrition; promoting health care, including preventive health care; sanitation; and safe drinking water.
- **Education, skills and livelihoods:** Education, special education, employment-enhancing vocational skills, digital and financial capability, and livelihood enhancement.
- **Inclusion and equality:** Gender equality, women's empowerment, facilities for women, orphans and senior citizens, and measures to reduce inequalities faced by socially and economically disadvantaged groups.
- **Environment:** Environmental sustainability, ecological balance, biodiversity, animal welfare, conservation of natural resources, and quality of soil, air and water.
- **Heritage, art and culture:** Protection of national heritage, art and culture; restoration; public libraries; and traditional arts and handicrafts.

- **Armed forces community:** Measures for armed forces veterans, war widows and their dependents, including eligible Central Armed Police Forces and Central Paramilitary Forces beneficiaries where covered by Schedule VII.
- **Sports:** Training to promote rural, nationally recognised, Paralympic and Olympic sports.
- **Eligible funds and relief:** Contributions to funds expressly covered by Schedule VII, including the Prime Minister's National Relief Fund, PM CARES Fund and other eligible Central Government funds.
- **Research and innovation:** Eligible contributions to incubators and research and development projects, and to specified public-funded institutions, in accordance with Schedule VII.
- **Area development and disaster response:** Rural development, slum area development, and disaster management including relief, rehabilitation and reconstruction, as permitted by Schedule VII.
- Any other activity permitted by law and approved by the Board of Directors of the Company.

5.2 The above list is illustrative and shall not limit the Company from undertaking any other activity permitted under Schedule VII.

6. CSR Governance – Bodies and Duties

6.1 Board

- Approve this Policy and disclose its contents in the Board's report and on the Company's website, if any;
- Approve the Annual Action Plan after considering the CSR Committee's recommendation, and alter it during the financial year on a justified recommendation;
- Ensure that approved CSR activities are undertaken and that the Company spends the amount required under section 135;
- Satisfy itself that funds disbursed have been used for approved purposes, based on certification by the Chief Financial Officer or the person responsible for financial management;
- Monitor Ongoing Projects with reference to approved timelines and year-wise allocation and make permissible modifications for smooth implementation;
- Ensure prescribed treatment of unspent amounts, surplus, excess spend and capital assets;
- Include prescribed CSR disclosures in the Board's report and make required statutory filings;
- Commission impact assessments where the statutory thresholds and conditions apply.

6.2 CSR Committee

- Formulate and recommend this Policy and amendments to the Board;
- Formulate and recommend the Annual Action Plan;
- Recommend CSR expenditure;
- Identify and evaluate projects consistent with Schedule VII;
- Monitor implementation, progress, outcomes and utilization of funds;
- Review due diligence and performance of Implementing Agencies;

- Report material deviations, non-compliance or misuse to the Board;
- Perform any other function assigned by the Board or applicable law.

6.3 The actual composition of the CSR Committee shall be recorded and disclosed in accordance with law. Meetings, quorums and procedures shall be governed by the Act, the Company's constitutional documents and applicable Board directions.

7. Annual Action Plan

7.1 For each financial year, the CSR Committee shall recommend, and the Board shall approve an Annual Action Plan containing, at a minimum:

- List of approved CSR projects or programmes within Schedule VII;
- Manner of execution;
- Modalities of utilization of funds and implementation schedules, including project duration and, where appropriate, timelines for disbursement and utilization by the Implementing Agency;
- Monitoring and reporting mechanisms;
- Details of need and impact assessment, if any;
- Project-wise budgets, locations, outputs, outcomes and responsible owners;
- Treatment of Ongoing Projects and any prior-year commitments.

7.2 The Board may alter the Annual Action Plan during the financial year on the CSR Committee's recommendation and based on reasonable justification. Entity-specific budgets and projects shall be maintained separately even where the companies collaborate.

8. Implementation Arrangements

8.1 CSR projects may be implemented directly by the Company, through an eligible Implementing Agency, or in collaboration with other companies, provided each participating company can report separately on its share of the project and expenditure.

8.2 Before appointment and periodically thereafter, the Company shall conduct proportionate due diligence on an Implementing Agency, including verification of its legal eligibility, CSR-1 registration where required, track record where applicable, governance, financial controls, tax and regulatory registrations, safeguarding capability, conflicts of interest and capacity to deliver the proposed work.

8.3 Written agreements shall specify scope, budget, milestones, utilization conditions, reporting, records retention, audit and inspection rights, intellectual property and publicity controls, data

protection, safeguarding, anti-bribery obligations, remedies for non-compliance and treatment of unspent or misapplied funds.

9. Monitoring, Assurance and Limited Audit Rights

9.1 The CSR Committee will be responsible for monitoring the CSR Projects undertaken by the Company directly or indirectly. The CSR Committee shall ensure that:

- Project progress shall be reviewed against approved milestones, budgets, outputs and outcomes;
- Implementing Agencies shall provide periodic narrative, financial and utilization reports supported by appropriate records;
- The Company may conduct site visits, beneficiary verification, third-party reviews, financial reviews or audits, subject to applicable law and proportionate risk;
- The CSR Committee shall receive periodic consolidated reporting and escalate material deviations to the Board;
- Corrective actions, recovery, suspension or termination may be initiated where funds are misused, or implementation materially departs from approval;
- Records shall be retained in accordance with applicable law and the Company's record-retention requirements.

10. CSR Expenditure and Financial Controls

10.1 The Company shall spend at least two per cent of the average Net Profits made during the three immediately preceding financial years, or such other amount as required by law.

- Administrative Overheads shall not exceed the statutory ceiling, currently five per cent of total CSR expenditure for the financial year.
- Any surplus arising from CSR activities shall not form part of business profits and shall be ploughed back into the same project, transferred to the Unspent CSR Account and spent under this Policy and the Annual Action Plan, or transferred to a Schedule VII fund within the prescribed period.
- Excess CSR expenditure may be set off against the CSR obligation of succeeding financial years only to the extent and in accordance with law. Surplus arising from CSR activities shall not be available for set-off.
- CSR expenditure may result in creation or acquisition of a capital asset only where the asset is held by an entity or beneficiary permitted under the CSR Rules.
- Contributions to a corpus shall qualify only where expressly permitted by applicable law and linked to eligible CSR purposes.

11. Unspent CSR amounts

11.1 Ongoing Projects

Any unspent amount relating to an Ongoing Project shall be transferred within thirty days from the end of the financial year to the Unspent CSR Account. It shall be spent within three financial years from the date of transfer, failing which it shall be transferred to a fund specified in Schedule VII within thirty days from completion of the third financial year, or within such other periods as may be prescribed.

11.2 Other than Ongoing Projects

Any unspent amount not relating to an Ongoing Project shall be transferred to a fund specified in Schedule VII within six months from the end of the financial year, or within such other period as may be prescribed. The Board's report shall state the reasons for any failure to spend the required amount.

12. Impact assessment

12.1 Where the Company meets the thresholds prescribed under the CSR Rules, it shall commission an impact assessment through an independent agency for eligible CSR projects. The impact assessment report shall be placed before the Board and annexed to the annual report on CSR. Permissible impact-assessment expenditure may be booked as CSR expenditure within the statutory limits.

13. Reporting, Disclosure and Statutory Filings

13.1 The Board's report shall contain the annual report on CSR in the prescribed format;

13.2 The Company's website, if any, shall disclose the composition of the CSR Committee, this Policy, and CSR projects approved by the Board, as required by law.

13.3 The Company shall file prescribed CSR forms and returns with the Registrar of Companies within applicable timelines;

13.4 The Company shall maintain projects, approval, agreement, disbursement, utilization, monitoring, impact and closure documentation sufficient to support statutory reporting and assurance.

14. Ethics, Safeguarding and Conflicts

14.1 CSR activities shall be conducted in accordance with applicable law and relevant Company policies, including anti-bribery, conflicts of interest, data privacy, information security, human rights and safeguarding requirements.

14.2 No director, officer, employee, Implementing Agency or intermediary may derive improper personal benefit from CSR funds. Actual or potential conflicts shall be disclosed and managed through appropriate recusal or other controls.

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15. Policy Review and Amendment

15.1 The CSR Committee shall periodically review this Policy and recommend amendments to the Board. The Board may revise the Policy at any time. Amendments to the Act, Schedule VII or CSR Rules shall apply from their effective date, and this Policy shall be interpreted to remain compliant pending formal revision.

16. CSR Policy Display

16.1 This CSR Policy shall be displayed on the Company's website, if there is any, and shall be disclosed in the Board's report as well.

Note: This policy has been approved by the Board of Directors on 25th September 2026

**NITU
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