

**CORPORATE SOCIAL RESPONSIBILITY POLICY
OF
FINAGLE FINANCIAL SERVICES PRIVATE LIMITED**

Version 1.0

Approved by the Board of Directors
on
May 23, 2026

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Director

Document History

Version	Effective Date	Reason for change	Prepared by	Recommended and Approved By
01	May 23, 2026	Adoption of Policy	Legal & Compliance	Board of Directors

1. INTRODUCTION AND APPLICABILITY

Corporate Social Responsibility (CSR) reflects an organization's commitment to conducting business in an economical, social and environmentally sustainable manner. As the businesses evolve, corporate responsibility toward stakeholders and general public is becoming a key priority.

CSR aims to build a strong connect between businesses and society, with the overarching goal of contributing responsibly to a better community and a cleaner environment. Integrating social, environmental, and ethical considerations into corporate governance is recognized as essential for ensuring long-term success, competitiveness, and sustainability.

Finagle Financial Services Private Limited ("Finagle" or "Company") has prepared this CSR Policy ("Policy") in alignment with its objective, principles, and values, delineating its responsibility as a socially and environmentally responsible corporate citizen. This Policy lays down the principles and mechanisms for undertaking various programs in accordance with the requirements provided under Section 135 of The Companies Act 2013, read with Schedule VII to the Companies Act 2013 and The Companies (Corporate Social Responsibility Policy) Rules, 2014 along with subsequent amendments and Gazette notifications (collectively referred as 'Legal Provisions'). The Policy shall apply to all the CSR projects, programs and activities undertaken by the Company at various locations in India for the benefit of diverse sections of the society.

2. OBJECTIVE

The objective of this CSR Policy is to articulate Company's commitment to conducting its business in a socially, environmentally, and ethically responsible manner. The Policy aims to:

- a) Integrate social, environmental, and community development concerns into the Company's business operations and governance.
- b) Establish a structured approach for planning, implementing, monitoring, and reporting CSR initiatives in compliance with Section 135 of the Companies Act, 2013 and related rules.
- c) Promote inclusive and sustainable development through strategic CSR projects that contribute meaningfully to society, particularly in areas outlined in Schedule VII of the Companies Act, 2013.
- d) Ensure effective allocation and utilization of CSR funds to create measurable social impact, especially in the local areas where the Company operates.
- e) Encourage transparency, accountability, and stakeholder engagement in all CSR undertakings.
- f) Foster strategic partnerships with government bodies, non-governmental organizations (NGOs), and other stakeholders to leverage expertise, enhance reach, and strengthen the effective implementation and impact of CSR initiatives.

3. REGULATORY CONTEXT

The Policy takes into account regulatory documents published or issued by the regulatory authority, in particular:

- a) Section 135 of the Companies Act 2013 read with Schedule VII of the Companies Act, 2013 read with circulars and amendments issued by the Ministry of Corporate Affairs from time to time
- b) The Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.
- c) Secretarial Standards on Meeting of the Board of Directors (SS-1)

4. DEFINITIONS

- a) "Act" means the Companies Act, 2013
- b) "Administrative overheads" means the expenses incurred by the company for 'general management and administration' of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme;
- c) "Board of Directors" or "Board" in relation to a company, means the collective body of the directors of the company.
- d) "CSR Activities or CSR Project" means such programs or projects or activities as may be approved by the Board in terms of this CSR Policy, Act and Rules.
- e) "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act.
- f) "Director" means a member of the Board of the Company
- g) "Entity" shall mean a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act.
- h) "International Organisation" means an organisation notified by the Central Government as an international organisation under section 3 of the United Nations (Privileges and Immunities) Act, 1947, to which the provisions of the Schedule to the said Act apply;
- i) "Net Profit" means the net profit of a company as per its financial statement calculated as per Annexure-1 in accordance with Section 198 of the Companies Act, 2013, but shall not include the following: (i) any profit arising from any overseas branch or branches of the company whether operated as a separate company or otherwise; and (ii) any dividend received from other in companies in India, which are covered under and complying with the provisions of section 135 of the Act.
- j) "Ongoing Project" means 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 it was commenced and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification.

- k) “Public Authority” means ‘Public Authority’ as defined in clause (h) of section 2 of the Right to Information Act, 2005;
- l) “Rules” means the Companies (Corporate Social Responsibility Policy) Rules, 2014 framed under the Companies Act, 2013 and as amended from time to time.

5. CONSTITUTION, COMPOSITION AND GOVERNANCE OF CSR COMMITTEE

5.1.1 Constitution and Composition of CSR Committee

In accordance with Section 135 of the Companies Act, 2013, every company with a net worth of ₹500 crore or more, or a turnover of ₹1,000 crore or more, or a net profit of ₹5 crore or more during the previous financial year, and whose required CSR expenditure exceeds ₹50 lakh, is required to constitute a CSR Committee of the Board (referred to as "The Committee" or “CSR Committee”).

The Board of the Company shall constitute the CSR Committee of the Board consisting of two or more Directors, out of which at least one director shall be an independent director, the Chief Executive Officer and the Head of Finance function. Provided that where a company is not required to appoint independent director under sub-section (4) of section 149, it shall have in its CSR Committee two or more Directors. The Board may decide the composition of the CSR Committee taking into consideration the respective roles and responsibilities of respective function heads of the Company.

5.2 Meetings of CSR Committee

- 5.2.1 **Chairperson of meetings** – The Chairperson of the Committee shall be appointed by the Board. If the Chairperson appointed by the Board is absent, the members present in the meeting shall choose another member to chair that meeting. If the Board does not make such an appointment, the Committee members shall elect a Chairperson from among themselves at the start of each meeting.
- 5.2.2 **Frequency of meetings** – The Committee shall hold meetings as and when required, to discuss various matters relating to CSR Activity. The meetings of the Committee can be convened either in person or through audio – video conferencing mode.
- 5.2.3 **Quorum of meeting** – The quorum shall be either two members or one third of the total members of the committee whichever is higher. The quorum shall be present not only at the time of commencement of the meeting but also while transacting business. CSR Committee may invite executives/employees of the company or any other officer/person to attend meetings or request clarifications on relevant matters. However, such invitees shall not be counted for the purpose of Quorum.
- 5.2.4 **Secretary of meeting-** The Company Secretary of the Company s or any other as may

be authorized shall act as the secretary/ organizer of the Committee.

5.2.5 Procedure for convening the meeting: -

- 5.2.5.1 Check the availability of Committee members to convene the meeting in order to decide the day, date and time of the meeting.
- 5.2.5.2 Obtain all necessary documents, and materials from the relevant departments or functions to assist in preparing agenda.
- 5.2.5.3 Issue notices of the meeting and circulate the agenda and other related materials to all the committee members at least seven days or such reasonable time prior to the meeting.
- 5.2.5.4 Record proceeding of the meetings.
- 5.2.5.5 Take the roll call of the members of the Committee and Invitees of the meeting to record the attendance of the Meeting.
- 5.2.5.6 Appoint or designate the chairman of the meeting.
- 5.2.5.7 Discuss the Agenda items of the Meeting in order and accord the Committee's approval as necessary.
- 5.2.5.8 Conclude the meeting with a Vote of Thanks.
- 5.2.5.9 Prepare and circulate the draft minutes to all Committee members for their review and feedback within 15 days of the meeting date.

5.2.6 **Minutes of the meeting** – The minutes of the meeting shall be signed by the Chairperson of each meeting along with the agenda and relevant documents of the Committee shall be kept and maintained under the custody of the Compliance Function of the Company. The signed minutes shall be placed before the Board in subsequent meeting for review. The CSR Committee shall conduct its meetings in accordance with the provisions of the Companies Act, 2013 and adhere to the applicable Secretarial Standards (SS-1) on Board Meetings issued by the Institute of Company Secretaries of India (ICSI), ensuring compliance with governance best practices.

6. ROLES AND RESPONSIBILITIES

6.1 The CSR Committee provides oversight and guidance on CSR performance and monitors compliance with the CSR Policy, commitments and the applicable CSR provisions and if required make necessary recommendations to the Board, from time to time. Without prejudice to the generality of the foregoing, the CSR Committee shall be responsible for the following activities:

- a) Formulate and recommend to the Board, a CSR Policy, which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII of the Companies Act 2013;
- b) Periodic review of the Corporate Social Responsibility Policy (CSR policy) and recommend any modifications or changes to the same for the approval of the Board.
- c) Identify and recommend CSR projects or programmes or activities to the Board in

alignment with the company's CSR policy and Schedule VII of the Companies Act, 2013.

- d) Determine the budget for CSR projects or programmes.
- e) To recommend the amount of expenditure to be incurred on the CSR activities to the Board.
- f) Spend the allocated CSR amount on the CSR projects or programmes once it is approved by the Board of the Company in accordance with the Act and applicable rules
- g) Monitor implementation of the CSR Policy, including projects undertaken by the Company and/or through the implementing agencies.
- h) Submit the CSR report containing the disclosures as mandated under the CSR Rules to the Board.
- i) To recommend to the Board to transfer any Unspent CSR amount to a designated Unspent CSR account, in the manner as prescribed under Section 135 of the Companies Act, 2013 and rules made thereunder.
- j) To provide necessary recommendation/advisory to the Board in accordance with CSR policy.
- k) To delegate the authority to Chief Executive Officer or any other employee/ officer of the Company to Identify, implement and execution of CSR activities.

To do all such acts, deeds, matters and things to ensure compliance with CSR norms and the CSR Policy, as amended, from time to time.

6.2 Roles and Responsibilities of Board of Directors

The Board holds the ultimate responsibility for overseeing and ensuring the effective implementation of Corporate Social Responsibility (CSR) in accordance with the Companies Act, 2013. The key responsibilities of the Board include:

- a) Approves the constitution of the Corporate Social Responsibility (CSR) Committee and any subsequent reconstitution thereof.
- b) Determines the roles, responsibilities, and powers of the CSR Committee from time to time.
- c) Appoints the Chairperson of the CSR Committee.
- d) Regularly monitors the functioning of the CSR Committee.
- e) Reviews the minutes of the CSR Committee as presented to the Board.
- f) Approve the Corporate Social Responsibility Policy of the company after considering the recommendations made by the Corporate Social Responsibility Committee
- g) Ensure that the company undertakes the activities as specified in the approved CSR Policy and Companies Act, 2013
- h) Approve the CSR Projects or programmes and CSR expenditure as recommended by the CSR Committee
- i) Ensure that CSR expenditure shall be in accordance with the para 8 of this policy on CSR expenditure

- j) To delegates the authorities to the Chief Executive Officer or any other employee/officer of the company to implement the CSR policy.

7. CSR ACTIVITIES

The Company may plan to undertake any of the CSR projects or programs or activities falling within the purview of Schedule VII of the Act or as inserted in Schedule VII from time to time as per **Annexure-2**.

In order to count towards CSR Expenditure, CSR Activities must be undertaken in compliance with the applicable laws and shall not include the following:

- The CSR activities shall be undertaken by the Company, as stated in this Policy, as projects or programs or activities excluding activities undertaken in pursuance of its normal course of business.
- The CSR activities which are exclusively for the benefit of employees of the Company or their family members shall not be considered as CSR activity
- Contribution to any political party of any amount directly or indirectly shall not be considered as CSR activity.
- activities supported by the companies on sponsorship basis for deriving marketing benefits for its products and services
- Projects/activities not falling within Schedule VII (i.e. activities mentioned under CSR initiatives and programs
- The CSR Activities will be carried out in a manner that the preference is to undertake the CSR Activities in and around the local areas where the Company operates.

CSR Committee shall provide recommendations to the Board with respect to specific CSR Activities that may be undertaken by the Company.

The officer or employee authorized by the CSR Committee shall provide adequate assistance (viz. data collection, survey, quotations and costs involved etc.) to the CSR Committee to enable it to make necessary recommendations to the Board. For this purpose, the CSR Committee may also approach external consultants for necessary assistance as it may deem fit at such costs as may be approved by the Board.

Based on the recommendations of the CSR Committee, the Board shall approve the CSR activities of the Company for a given financial year

8. CSR EXPENDITURE

The Company shall spend at least 2% of the average net profits of the Company made during the three (03) immediately preceding financial years in accordance with the Act, Rules and CSR Policy.

If the Company fails to spend the required CSR amount, the Board shall, in its report, specify the reasons for not spending the amount. Unless the unspent amount pertains to any ongoing project as referred to in point (c) below, the Company shall transfer such unspent amount to one of the funds specified in Schedule VII within six months from the end of the financial year in which the CSR obligation arose. These funds include:

- i. Prime Minister's National Relief Fund (PMNRF)
- ii. PM CARES Fund
- iii. Swachh Bharat Kosh
- iv. Clean Ganga Fund
- v. Any other fund established by the Central Government for:
 - ✓ Socio-economic development
 - ✓ Relief and welfare of Scheduled Castes, Scheduled Tribes, other backward classes, minorities, and women
- vi. Any other fund notified by the Central Government for CSR purposes

Any amount remaining unspent under point a) above, pursuant to any ongoing project, undertaken by a company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the company within a period of thirty days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to any of the Funds specified in point (b) above within a period of thirty days from the date of completion of the third financial year;

If the Company spends more than the required CSR amount in a financial year, the Committee may recommend to the Board that the excess amount be adjusted against CSR obligations in future years.

The Company shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.

Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

9. CSR IMPLEMENTATION

The Board shall ensure that the CSR Activities are undertaken by the Company either Itself or through any of the following Implementing agencies:

- i. Section 8 companies, registered public trusts, or societies established by the Company or jointly with others;
- ii. Entities established by the Central or State Government (Statutory bodies created under

- an Act of Parliament or State Legislature.
- iii. Other eligible entities with a minimum 3-year track record in similar activities.

Every implementing agency, who intends to undertake any CSR activity, shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar and must have CSR Registration Number.

A company may also collaborate with other companies for undertaking CSR projects or programmes or activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes in accordance with rules.

The Board of a company shall 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/Finance Head or the person responsible for financial management shall certify to the effect.

In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and year wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

10. CSR MONITORING

The implementation of the CSR Policy shall be regularly monitored by the CSR Committee to ensure compliance with the Policy, applicable laws, and the achievement of intended social impact. The Committee will review progress reports, evaluate ongoing projects, and recommend any necessary adjustments to the Board for approval.

11. DISCLOSURE AND REPORTING

The Board report of the Company shall include an annual report on CSR containing the particulars regarding content of CSR Policy, reason for unspent CSR amount, the details of CSR initiatives, Composition of the Committee and activities in prescribed format as set out under Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time,

Further, the Company will also place the composition of its CSR Committee (if any) along with CSR Policy and CSR Projects approved and undertaken by the Company on the website of the Company.

The Company shall submit the CSR report in Form CSR-2 to the Registrar of Companies annually. This report must be filed by March 31 of the year following the financial year to which the report relates, as specified in the applicable rules.

12. DOCUMENTATION REQUIREMENTS FOR CSR COMMITTEE AND BOARD APPROVAL

To maintain transparency, ensure regulatory compliance, and enable effective decision-making, the documents and information outlined in Annexure-3 are required to be maintained and presented/submitted to CSR Committee, Board and Registrar of Companies (ROC).

13. APPROVAL & REVIEW OF CSR POLICY

The Board of the Directors of the Company has approved this Policy on the recommendation of CSR Committee. The Board may amend the Policy as may be required from time to time. This policy shall be reviewed at least once every year if required by applicable laws or regulations, to ensure its continued relevance and effectiveness.

Calculation of profits

1. In computing the net profits of a company in any financial year for the purpose of CSR obligations:
 - a. credit shall be given for the sums specified in sub-section (2), and credit shall not be given for those specified in sub-section (3); and
 - b. the sums specified in sub-section (4) shall be deducted, and those specified in sub-section (5) shall not be deducted.
2. In making the computation aforesaid, credit shall be given for the bounties and subsidies received from any Government, or any public authority constituted or authorised in this behalf, by any Government, unless and except in so far as the Central Government otherwise directs.
3. In making the computation aforesaid, credit shall not be given for the following sums, namely:
 - a. profits, by way of premium on shares or debentures of the company, which are issued or sold by the company unless the company is an investment company as referred to in clause (a) of the Explanation to section 186 of the Act.
 - b. profits on sales by the company of forfeited shares;
 - c. profits of a capital nature including profits from the sale of the undertaking or any of the undertakings of the company or of any part thereof;
 - d. profits from the sale of any immovable property or fixed assets of a capital nature comprised in the undertaking or any of the undertakings of the company, unless the business of the company consists, whether wholly or partly, of buying and selling any such property or assets:
 - e. Provided that where the amount for which any fixed asset is sold exceeds the written-down value thereof, credit shall be given for so much of the excess as is not higher than the difference between the original cost of that fixed asset and its written down value;
 - f. any change in carrying amount of an asset or of a liability recognised in equity reserves including surplus in profit and loss account on measurement of the asset or the liability at fair value.
4. In making the computation aforesaid, the following sums shall be deducted, namely:-
 - a. all the usual working charges;
 - b. Directors' remuneration;
 - c. bonus or commission paid or payable to any member of the company's staff, or to any engineer, technician or person employed or engaged by the company, whether on a whole-time or on a part-time basis;
 - d. any tax notified by the Central Government as being in the nature of a tax on excess or abnormal profits;
 - e. any tax on business profits imposed for special reasons or in special circumstances and notified by the Central Government in this behalf;
 - f. interest on debentures issued by the company;
 - g. interest on mortgages executed by the company and on loans and advances secured by

- a charge on its fixed or floating assets;
- h. interest on unsecured loans and advances;
- i. expenses on repairs, whether to immovable or to movable property, provided the repairs are not of a capital nature;
- j. outgoings inclusive of contributions made under section 181 of the Act;
- k. depreciation to the extent specified in section 123 of the Act;
the excess of expenditure over income, which had arisen in computing the net profits in accordance with this section in any year, in so far as such excess has not been deducted in any subsequent year preceding the year in respect of which the net profits have to be ascertained;
- l. any compensation or damages to be paid in virtue of any legal liability including a liability arising from a breach of contract;
- m. any sum paid by way of insurance against the risk of meeting any liability such as is referred to in clause (m);
- n. debts considered bad and written off or adjusted during the year of account.

5. In making the computation aforesaid, the following sums shall not be deducted, namely:

- a. income-tax and super-tax payable by the company under the Income-tax Act, 1961 , or any other tax on the income of the company not falling under clauses (d) and (e) of sub-section (4);
- b. any compensation, damages or payments made voluntarily, that is to say, otherwise than in virtue of a liability such as is referred to in clause (m) of sub-section (4);
- c. loss of a capital nature including loss on sale of the undertaking or any of the undertakings of the company or of any part thereof not including any excess of the written-down value of any asset which is sold, discarded, demolished or destroyed over its sale proceeds or its scrap value;
- d. any change in carrying amount of an asset or of a liability recognised in equity reserves including surplus in profit and loss account on measurement of the asset or the liability at fair value.

CSR Activities

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to Swachh Bharat Kosh set-up by the Central Government for promoting 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 centers 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 or 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 arts 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 recognized sports, paralympic sports and Olympic sports;
- viii. Contribution to Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio
- economic development and relief and welfare of the scheduled caste, tribes, other backward classes, minorities and women;
- ix. 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
- x. 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 Defense 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);
- xi. Rural development projects;

- xii. Slum Area development;
- xiii. Disaster management, including relief, rehabilitation and reconstruction activities;
- xiv. Such other activities and projects covered in Schedule VII to the Companies Act, 2013 from time to time.

Annexure-3

The following Documents/information must be submitted to CSR Committee, Board or Registrar of Companies

Stage	Documents/Information Required	Details	Person Responsible
CSR Committee Review & Recommendation to Board	CSR Project Proposal Summary	Project title, objective, CSR activity, geographical area, implementation plans	CEO/ Authorized Person
	Implementing Agency Details	CSR-1 certificate, registration docs, PAN/GST, audited financials (3 years), profile and experience	Implementing Agency, CEO or Authorized Person
	CSR Budgets and Expenditure Statements	Budgeted vs. actual CSR expenditure	Head of Finance & Accounts
Board Approval	CSR Committee's Recommendation Note	Summary note from CSR Committee	Corporate Secretarial Department
	Minutes of CSR Committee Meeting	Approved minutes of meeting	Corporate Secretarial Department
	Fund Availability and Budget Summary	CSR fund availability and approved budgets	Head of Finance & Accounts
	CFO/Finance Head Certification	Certification of allocation/utilization	CFO / Head of Finance
	Justification for Ongoing Projects	Rationale and updated timelines	CEO or Authorized Person
	Details of Surplus/Unspent Amount	Unspent amount and next steps	Head of Finance & Accounts
Filing Form CSR-2 with ROC	Financial Information	Net worth, turnover, net profit for last 3 years	Head of Finance & Accounts
	CSR Committee Details	Members, meetings held, attendance	Corporate Secretarial Department
	Project Details	Funds allocated/spent, locations, implementation mode	CEO or Authorised Person
	Unspent CSR Amounts	Transfers to specified funds	Head of Finance & Accounts

	Shortfall Reasons	Reasons for shortfall and corrective steps	CEO or Authorised Person
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