

KFIN TECHNOLOGIES LTD ("KFINTECH")

Document Name **Environmental Social & Governance Policy (ESG Policy)**

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SIGNATORIES

Version	Prepared By	Reviewed and confirmed by	Approved by
1.0	Snehal Garde Compliance Team	Anish Kumar Chief Compliance Officer	Board of Directors

VERSION CONTROL

Version	Date	Description	Description of Changes
1.0	May 27, 2026	ESG Policy	New Policy

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1. PURPOSE OF POLICY

KFin Technologies Limited including its subsidiaries, joint ventures and branches (collectively referred to as “Company” or “Kfintech”), is committed to embedding Environmental, Social, and Governance (“ESG”) principles and strive to create long-term value for its stakeholders while contributing to the betterment of society. The Company’s ESG initiatives are aligned with its core values which are integrity, innovation, and responsibility.

This Policy reflects the Company’s dedication to undertake responsible business practices, maintain transparency, and focus on continuous improvement which are aligned with the global standards and stakeholder expectations. This is an overarching Policy which covers all the aspects of ESG and individual policies such as Greenhouse Gas (GHG) Emissions Policy, Energy Efficiency Policy, Waste Management Policy, Water Efficiency Policy, Human Rights Policy and Company’s Code of Conduct policy shall be read in conjunction with this ESG Policy.

2. SCOPE AND APPLICABILITY

This ESG policy applies to

- (a) The Company.
- (b) The Board of Directors, executive management, employees and other stakeholders of the Company.
- (c) All activities, operations and decision-making processes conducted by the Company include but not limited to strategic planning, risk management, financial reporting and stakeholder’s engagement.

3. KEY GUIDELINES FOR ESG POLICIES

This Policy outlines the ESG governance structure, roles and responsibilities, and the reporting and disclosure framework of the Company. It is aligned with the requirements of:

- SEBI’s Business Responsibility and Sustainability Reporting (BRSR) and BRSR Core;
- The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”), and;
- The National Guidelines on Responsible Business Conduct (NGRBC) issued by the Ministry of Corporate Affairs, which serve as the foundational principles for responsible and sustainable business conduct in India.
- The Corporate Social Responsibility (CSR) provisions under Section 135 of the Companies Act, 2013, as administered by the Ministry of Corporate Affairs.

4. ESG GOVERNANCE STRUCTURE

4.1 Board of Directors

The Board of directors shall be responsible to:

- i. Approve ESG strategy, policies, goals and disclosures, including BRSR / BRSR Core placed in the Annual Report as required by LODR Regulation 34(2)(f).
- ii. Oversee integration of material sustainability (ESG) risks and opportunities into the enterprise risk management framework and overall corporate strategy.
- iii. Review assurance plans and outcomes for BRSR Core metrics, and ensure independence/competence of the assurance provider as per SEBI circulars.
- iv. Approve ESG-related disclosures to stock exchanges under LODR Regulation 30 (e.g., new or revised ESG ratings from SEBI-registered ESG Rating Providers).

4.2 Risk Management Committee (“RMC”):

The RMC shall be responsible to:

- i. Formulate and recommend to the Board a detailed Risk Management Policy, including a framework for identifying internal and external risks, specifically including sustainability risks (particularly ESG-related), financial, operational, sectoral, information and cyber security risks, and any other material risks.
- ii. Recommend measures for risk mitigation, including internal controls and Business Continuity Planning (BCP); monitor and oversee implementation of the Risk Management Policy and evaluate the adequacy of risk management systems.
- iii. Review periodic trackers on compliance with the policy and provide updates to the Board.
- iv. Ensure ESG-related risks and controls are embedded in risk registers and are periodically assessed for likelihood, impact and mitigation effectiveness.

5. ESG COMMITMENTS

5.1 ENVIRONMENTAL RESPONSIBILITY

a. Resource Efficiency: At KFin, we are dedicated to maximizing resource efficiency and promoting the responsible utilization of critical natural resources such as energy, water, and more. Our commitment to sustainability drives us to embrace eco-friendly practices, which not only minimizes waste but also significantly reduce our carbon footprint. The detailed policies on Energy Efficiency and Water Efficiency have been framed by KFinTech and can be referred at <https://investor.kfintech.com/wp-content/uploads/2023/08/Energy-Efficiency-Policy.pdf> & <https://investor.kfintech.com/wp-content/uploads/2023/08/Water-Efficiency-Policy.pdf>.

b. Waste Management: KFINTECH prioritizes environmental protection and waste reduction by implementing actions that reflect its commitment to streamline activities and minimize waste, ensuring a sustainable and eco- friendly approach. KFintech demonstrates a high level of commitment to protecting the environment by implementing efficient waste management practices. The detailed policy on Waste Management Policy can be referred at <https://investor.kfintech.com/wp-content/uploads/2023/08/Waste-Management-Policy.pdf>

c. Carbon Footprint Reduction: With carefully planned GHG Emission Policy, KFintech works towards cleaner operations and creates a positive impact on the stakeholders and the environment. KFintech continuously strives to reduce carbon footprint and source clean and efficient energy. KFintech fosters environmental awareness and responsibility amongst its employees, customers, suppliers, and other stakeholders. KFintech’s detailed policy to GHG emissions can be referred at <https://investor.kfintech.com/wp-content/uploads/2023/08/GHG-Emission-Policy.pdf> .

d. Compliance: KFintech is committed to comply with all applicable environmental laws, regulations, and best practices relevant to its operations.

5.2 SOCIAL RESPONSIBILITY

a. Respectful Workplace: At KFintech, the team believes in prioritizing the well-being of its employees, as they are the driving force behind its success. KFintech is dedicated to providing a work environment that not only promotes professional growth but also ensures the safety, happiness, and inclusivity of every team member.

b. Diversity and Inclusion: KFintech celebrates diversity and recognizes that the employees bring unique perspectives to the table. The company actively encourages and values these differences, as they contribute to innovation and growth.

c. Safety First: Safety is non-negotiable at KFintech. The company maintains a workplace that is safe and secure, to ensure that the employees are able to carry out their duties without any concerns for their physical well-being. Rigorous safety protocols and regular training ensures a hazard-free environment.

d. Zero Tolerance for Discrimination: KFintech firmly stands against all forms of discrimination. Every employee is treated with respect, dignity, and fairness, regardless of their race, gender, religion, age, disability, or sexual orientation. Discrimination has no place within the organization.

e. Harassment-Free Zone: Harassment of any kind is strictly prohibited. KFintech’s policies and reporting mechanisms empower employees to speak up without fear of retaliation. KFintech is committed to promptly address and resolve any reported issues The Code of Conduct and Business Ethics Policy can be referred at <https://investor.kfintech.com/wp-content/uploads/2023/10/Code-of-Conduct-and-Business-Ethics.pdf>

f. Equal Opportunities: KFintech believes in providing equal opportunities to all the team members. Career advancement of the team members is based on their skills, performance, and potential, ensuring a level playing field.

e. Training and Development: KFintech is dedicated to fostering a culture of continuous learning and development that aligns with its vision and mission. It aims to enhance organizational capabilities, including skills, knowledge, and attitude, to drive growth and success. KFintech prioritizes continuous learning, linking training activities to strategic objectives, and providing growth opportunities for employees. By investing in training, it not only supports individual development but also strengthens employee retention and succession planning.

f. Work-Life Balance: KFintech understands the importance of a healthy work-life balance. Our policies and flexible work arrangements allow our team members to thrive both professionally and personally.

g. Human Rights: KFintech believes in the power of business to protect and promote human rights, KFintech is committed to long-term protection of human rights and strive to create a workspace that respects and upholds the rights of all individuals. It adheres to applicable local and national laws and regulations while integrating the principles outlined by international human rights guidelines. The policy related to the Human Rights Policy can be accessed at https://investor.kfintech.com/wp-content/uploads/2023/08/KFintech_Human-Rights-Policy.pdf.

h. Community Engagement: KFintech firmly believes that its success should not only benefit the Company as whole, but also the communities it serves. That's why KFintech is committed to giving back, actively engaging with local communities, to make a positive impact on their social and economic development. The dedication to responsible business practices and philanthropic initiatives like Sankalp which focuses on four main pillars such that empowering education (especially for tribal students), environmental sustainability, community development, and health/wellbeing reflects KFintech's desire to contribute to growth and well-being.

5.3 GOVERNANCE

a. Ethical Conduct: Maintain highest standards of integrity, transparency, and accountability in the business dealings.

b. Board Oversight: Ensure active Board and senior management involvement in ESG strategy, risk management, and reporting.

c. Risk Management: Integrate ESG risks into enterprise risk management processes to proactively address potential impacts.

d. Compliance and Reporting: Comply with all applicable laws and regulatory requirements, including SEBI disclosures and transparently report the ESG performance.

e. Stakeholder Engagement: Engage constructively with investors, clients, employees, regulators, and other stakeholders to promote sustainable development and trust.

f. Anti-corruption and Anti Bribery: Adhere with the principles of integrity, ethics, and responsibility. KFintech has zero tolerance approach to acts of bribery and corruption.

6. ESG REPORTING & DISCLOSURE FRAMEWORK

a. BRSR in Annual Report: KFintech annually discloses its Environmental, Social and Governance (ESG) performance through the Business Responsibility and Sustainability Report (BRSR), which forms part of the Company's Annual Report, in compliance with the requirements applicable to the top 1000 listed entities under Regulation 34(2)(f) of the SEBI (LODR) Regulations, 2015

b. BRSR Core & Assurance: The Company reports BRSR Core Key Performance Indicators (KPIs) strictly in accordance with the formats and standards prescribed by SEBI. In line with SEBI's phased assurance framework, we obtain limited assurance (or assessment, as applicable) from an independent, SEBI-compliant assurance provider. The Company also maintains robust audit trails, systematic data management, and appropriate governance over all ESG dataset.

c. ESG Rating Disclosures (LODR Reg. 30): The Company discloses to stock exchanges any new or revised ESG Rating assigned by SEBI-registered ESG Rating Providers, in accordance with the material disclosure requirements under Regulation 30 of the SEBI LODR Regulations. (Supported by SEBI's ESG Rating Provider framework, which mandates such disclosures as material events.)

d. Mode of Disclosure: The Company ensures that all mandatory ESG-related disclosures BRSR, BRSR Core, ESG ratings, and assurance reports—are published on the Company's website, appropriately included in the Annual Report, and filed with stock exchanges (including XBRL submissions, wherever required by SEBI).

7. IMPLEMENTATION AND MONITORING

KFintech shall ensure that:

- The ESG governance structure is integrated within its overall corporate governance framework, ensuring board-level oversight and management-level implementation.

- The ESG objectives and performance indicators are integrated into business planning and reviewed periodically.
- Training, awareness programs, and communication channels support employee engagement on ESG matters.
- Ensure regular internal audits and external assurance compliance and continuous improvement.

8. POLICIES THAT GUIDES ESG COMMITMENTS

At KFINTECH the following policies guide the ESG commitments.

- Greenhouse Gas (GHG) Emissions Policy.
- Energy Efficiency Policy.
- Waste Management Policy.
- Water Efficiency Policy.
- Human Rights Policy.
- Code of Conduct.
- Whistle Blower Policy.
- Prevention of Sexual Harassment (PoSH).

9. REVIEW OF THE POLICY

This Policy shall be reviewed annually or as necessary to reflect evolving best practices, business strategies, and stakeholder expectations. Amendments to the policy shall be approved by the Board of Directors. The feedback from stakeholders and assessments of governance practices shall inform ongoing improvements in the Company's governance framework.

End of Document
