August 21, 2026

BSE Limited
Department of Corporate Services,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400 001

Scrip Code: 543396

National Stock Exchange of India Limited
The Listing Department,
Exchange Plaza,
Bandra Kurla Complex,
Mumbai - 400 051

Symbol: PAYTM

Sub: Disclosure under Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 - Business Responsibility and Sustainability Report of the Company for the financial year 2025-26

Dear Sir/ Ma'am,

Pursuant to Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Please find enclosed Business Responsibility and Sustainability Report of the Company for the financial year 2025-26, along with Independent Assurance Statement, issued by SGS India Private Limited, which forms part of Annual Report.

This disclosure will also be hosted on the Company's website viz. https://ir.paytm.com/.

Kindly take the same on record.

Thanking you,
Yours Sincerely,

For One 97 Communications Limited

SUNIL KUMAR BANSAL
Digitally signed by SUNIL KUMAR BANSAL
Date: 2026.08.21 18:58:33 +05'30'

Sunil Kumar Bansal
Company Secretary and Compliance Officer
FCS: 4810

Encl.: As above

Business Responsibility & Sustainability Reporting

SECTION A: GENERAL DISCLOSURES

I. Details of the listed entity

1	Corporate Identity Number (CIN) of the Listed Entity	L72200DL2000PLC108985
2	Name of the Listed Entity	One 97 Communications Limited
3	Year of incorporation	2000
4	Registered office address	136, First Floor, Devika Tower Nehru Place, New Delhi, India-110019
5	Corporate address	One Skymark, Tower-D, Plot No. H-10B, Sector-98, Noida, Uttar Pradesh, India-201304
6	E-mail	compliance.officer@paytm.com
7	Telephone	+91-120-4770770
8	Website	https://paytm.com/
9	Financial year for which reporting is being done	FY 2025-26
10	Name of the Stock Exchange(s) where shares are listed	The Equity shares of OCL are listed and traded on National Stock Exchange of India Limited (NSE) and Bombay Stock Exchange Limited (BSE).
11	Paid-up Capital	₹ 64,00,45,681
12	Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report	Name: Sunil Kumar Bansal Company Secretary and Compliance Officer Telephone Number: +91-120-4770770 Email: compliance.officer@paytm.com
13	Reporting boundary	For FY 2025–26, the reporting boundary has been expanded to include One 97 Communications Limited (OCL) and its wholly owned material subsidiary, Paytm Payments Services Limited (PPSL) — collectively referred to as "Paytm or Company." This is due to the transfer of offline merchant payments business from OCL to PPSL effective from midnight of November 30, 2025. This expanded reporting boundary provides stakeholders with a more comprehensive view of Paytm's core payments business, including key digital solutions such as Soundbox and POS machines. For FY 2024-25, the data is presented for OCL on a standalone basis. The data disclosed for FY 2025 - 26 is not directly comparable with FY 2024 - 25 data due to change in reporting boundary, year-on-year comparisons should be interpreted with due consideration of the change in reporting scope. Key Performance Indicators (KPIs) associated with the Environment & Social pillars across the report are presented on a combined basis for OCL and PPSL, unless otherwise specified. In order to maintain data accuracy and transparency for stakeholders, few of the Governance and Financial disclosures are disclosed separately for OCL and PPSL in distinct tables wherever applicable. Furthermore, Financial figures have been restated for FY 2024 - 25 to reflect the change in reporting from Millions to Crores.

14	Name of assurance provider	SGS India Private Limited
15	Type of assurance obtained	Reasonable Assurance for BRSR Core Indicators, Limited Assurance for BRSR Non-Core (Essential & Leadership) Indicators.

II. Products/services

16. Details of business activities (accounting for 90% of the turnover):

For OCL

S. No	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Payment and Financial Services	**Payment Services** for consumers and merchants, which enable them to send and receive payments both online and in-store. **Financial Services** include distribution of digital gold and digital distribution of credit.	85.19%
2	Marketing Services	**Marketing Services** include ticketing for travel, deals and gift vouchers. It also includes advertising and credit card distribution for merchants.	14.81%

For PPSL

S. No	Description of Main Activity	Description of Business Activity	% of Turnover of the entity[1]
1	Payment	**Payment Services** for merchants, which enable them to receive payments offline, online and in-store.	100.00%

[1]**Note:** The reported figures are based on restated financials of PPSL that incorporate eight months of revenue from the offline merchant payments business under the holding company i.e OCL. Although the offline merchant payments business was transferred from OCL to PPSL effective from midnight of November 30, 2025, the financial figures have been restated for PPSL as per the applicable accounting standards requiring the disclosure of a full year of operations.

17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

S. No	Product/Service	NIC Code	% of total Turnover contributed
1	Key services offered by OCL (including its subsidiaries such as Paytm Insurance Broking Private Limited, Paytm Money Limited and Paytm Payments Services Limited) include mobile recharge, bill payments such as utility bills, education and money transfers on the app, online payment gateways as well as offline payment solutions to merchants either through QR codes, Soundbox or Card Machines. Apart from this, it also offers digital distribution of credit, insurance, mutual funds and equity broking. Other services include ticketing, deals and gift vouchers and advertising services for merchants as well as distribution of credit cards.	63999	100.00%

III. Operations

18. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total
National[1]	0	90	90
International[2]	0	20	20

[1]**Note:** National locations represent Corporate offices, Sales offices and Fleet hubs.

[2]**Note:** International locations represent the number of registered offices of the subsidiaries of OCL.

19. Markets served by the entity:

a. Number of locations

Locations	Number
National (No. of States)	28 States and 8 Union Territories[1]
International (No. of Countries)	13[2]

[1] **Note:** Paytm provides its Payment, Financial and Marketing services across all States and Union Territories of India.

[2] **Note:** International locations in terms of market served represent the number of countries that generated recorded revenue from the export service provided during the FY 2025-26, either by OCL, or by its subsidiaries.

b. What is the contribution of exports as a percentage of the total turnover of the entity?

For OCL, total export is less than 1% of total revenue from operations during FY 2025-26.

For PPSL, there is no contribution from export services as a percentage of the total turnover.

c. A brief on types of customers

Customers: Leverage Paytm app and website for payment services such as seamless money transfers, merchant payments, bill payments and e-commerce transactions. The Company offers payments, marketing and financial services to over 7.55 Crore transacting users (average of FY 2025-26) who benefit from our aforesaid diverse range of services. These services are available on a pan India basis to individuals spanning across various age groups. The Company has a customer centric approach as their active engagement drives innovation in areas of payment and financial services.

Merchants: Our merchants leverage our innovative payment solution services through our QR codes, Soundbox and POS Machines for seamless payment acceptance and to enhance overall customer experience. Our merchant network has grown substantially, reaching 4.90 Crore merchants as of March 2026.

IV. Employees

20. Details as at the end of Financial Year:

a. Employees and workers (including differently abled):

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
	EMPLOYEES					
1.	Permanent (D)[1]	10,587	9,545	90.16%	1,042	9.84%
2.	Other (E)	NIL	NIL	NIL	NIL	NIL
3.	**Total employees (D + E)**	**10,587**	**9,545**	**90.16%**	**1,042**	**9.84%**
	WORKERS[2]					
4.	Permanent (F)	NIL	NIL	NIL	NIL	NIL
5.	Other than Permanent (G)	NIL	NIL	NIL	NIL	NIL
6.	**Total workers (F + G)**	**NIL**	**NIL**	**NIL**	**NIL**	**NIL**

[1]**Note:** Permanent Employees include Full Time Sales and Non-Sales employees.

[2]**Note:** All of Paytm's workforce is categorized as 'Employees' and it does not have any 'Workers'. Hence in all the sections, details sought for the 'Workers' category are not applicable.

b. Differently abled Employees and workers:

S. No.	Particulars	Total (A)	Male		Female	
			No. (B)	% (B / A)	No. (C)	% (C / A)
	DIFFERENTLY ABLED EMPLOYEES					
1.	Permanent (D)[1]	10	10	100.00%	NIL	NIL
2.	Other (E)	NIL	NIL	NIL	NIL	NIL
3.	**Total employees (D + E)**	**10**	**10**	**100.00%**	**NIL**	**NIL**
	DIFFERENTLY ABLED WORKERS					
4.	Permanent (F)	NIL	NIL	NIL	NIL	NIL
5.	Other than Permanent (G)	NIL	NIL	NIL	NIL	NIL
6.	**Total workers (F + G)**	**NIL**	**NIL**	**NIL**	**NIL**	**NIL**

[1]**Note:** The data presented above encompasses individuals who have self-identified as disabled and have provided their disability certificates.

21. Participation/Inclusion/Representation of women

OCL

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	7	2	28.57%
Key Management Personnel[1]	4	1	25.00%

PPSL

	Total (A)	No. and percentage of Females	
		No. (B)	% (B / A)
Board of Directors	6	1	16.67%
Key Management Personnel[1]	4	1	25.00%

Note: Above table represents Paytm's Board of Directors and Key Management Personnel as of March 31, 2026.

[1]**Note:** Key Managerial Personnel (KMP) comprise the Managing Director (MD) & Chief Executive Officer (CEO), Chief Financial Officer (CFO), Company Secretary (CS), and Whole-Time Director, in accordance with the provisions of the Companies Act.

22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2025 - 26 Current Financial Year			FY 2024 - 25 Previous Financial Year			FY 2023 - 24 Prior to Previous Financial Year		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees[1]	50.09%	44.99%	49.67%	99.85%	66.32%	97.47%	86.30%	37.93%	82.58%
Permanent Workers	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

[1]**Note:** Turnover rate for permanent employees includes confirmed Sales and Non-Sales employees (Entity transfers from the Company to other group entities are not included in attrition). Sales and Non-Sales employees on probation are not included since they are yet to be confirmed. The majority of attrition is attributable to the field sales workforce. During FY 2025–26, the turnover rate decreased as new field sales employees were onboarded under a different entity.

V. Holding, Subsidiary and Associate Companies (including joint ventures)

23. (a) Names of holding / subsidiary / associate companies / joint ventures

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Paytm Payments Services Limited	Subsidiary	100.00%	Yes
2	OCL Tech Platforms Limited (formerly known as One 97 Communications India Limited)	Subsidiary	100.00%	No
3	Paytm Cloud Technologies Limited ('PCTL') (formerly known as Paytm Entertainment Limited)	Subsidiary	100.00%	No
4	Paytm Money Limited	Subsidiary	100.00%	No
5	Mobiquest Mobile Technologies Private Limited #	Subsidiary	100.00%	No
6	Urja Money Private Limited ('Urja') ##	Subsidiary	100.00%	No
7	Paytm Services Private Limited	Subsidiary	100.00%	No
8	Paytm Insurance Broking Private Limited	Subsidiary	100.00%	No
9	Foster Payment Networks Private Limited (w.e.f. October 10, 2025)*	Subsidiary	100.00%	No
10	Paytm Intelligence Limited (formerly known as Paytm Emerging Tech Limited and earlier Paytm General Insurance Limited) (w.e.f. October 30, 2025)*	Subsidiary	100.00%	No
11	Paytm Assure Tech Limited (formerly known as Paytm Life Insurance Limited) (w.e.f. October 30, 2025)*	Subsidiary	100.00%	No
12	Paytm Insuretech Private Limited (w.e.f. November 28, 2025)*	Subsidiary	100.00%	No
13	Paytm Financial Services Limited ('PFSL') (w.e.f. November 28, 2025)*	Subsidiary	100.00%	No
14	Admirable Software Limited (w.e.f. December 31, 2025)*	Subsidiary	100.00%	No
15	Fincollect Services Private Limited (w.e.f. January 13, 2026)*	Subsidiary	100.00%	No
16	Paytm Singapore Private Limited (subsidiary of PCTL, w.e.f. June 03, 2025)	Subsidiary	100.00%	No
17	Paytm Company (subsidiary of PCTL, w.e.f. July 17, 2025)	Subsidiary	100.00%	No
18	Paytm Europe Payments S.A. (subsidiary of PCTL, w.e.f. January 12, 2026)	Subsidiary	100.00%	No
19	One97 Communications Nigeria Limited	Subsidiary	100.00%	No
20	One97 Communications FZ-LLC	Subsidiary	100.00%	No
21	One97 Communications Singapore Private Limited ('OCSPL') ###	Subsidiary	100.00%	No
22	One97 USA Inc.	Subsidiary	100.00%	No
23	One97 Communications Rwanda Private Limited (subsidiary of OCSPL)	Subsidiary	100.00%	No
24	One97 Communications Tanzania Private Limited (subsidiary of OCSPL)	Subsidiary	100.00%	No
25	One97 Uganda Limited (subsidiary of OCSPL)	Subsidiary	100.00%	No
26	One97 Ivory Coast SA (subsidiary of OCSPL)	Subsidiary	100.00%	No
27	One97 Benin SA (subsidiary of OCSPL)	Subsidiary	100.00%	No
28	Paytm Labs Inc. (subsidiary of OCSPL)	Subsidiary	100.00%	No
29	One97 Communications Malaysia Sdn. Bhd. (subsidiary of OCSPL)	Subsidiary	100.00%	No

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
30	One Nine Seven Communication Nepal Private Limited (subsidiary of OCSPL)	Subsidiary	100.00%	No
31	One Nine Seven Digital Solutions Limited (subsidiary of OCSPL)	Subsidiary	100.00%	No
32	One Nine Seven Communications Saudi Arabia For Communication and Information Technology (subsidiary of OCSPL)	Subsidiary	100.00%	No
33	One97 Communications Bangladesh Private Limited (subsidiary of OCSPL)	Subsidiary	70.00%	No
34	Little Internet Private Limited ('Little')	Subsidiary	62.53%	No
35	Nearbuy India Private Limited (subsidiary of Little)	Subsidiary	62.53%	No
36	First Games Technology Private Limited ('FG') ^^**	Joint Venture	55.00%	No
37	First Games Singapore Pte. Ltd. (wholly owned subsidiary of FG)	Joint Venture	55.00%	No
38	Bluefield Technology Beijing Co. Ltd. (wholly owned subsidiary of FG)	Joint Venture	55.00%	No
39	Paytm Arab Payments LLC (subsidiary of PCTL, w.e.f. April 30, 2025)	Subsidiary	51.00%	No
40	Paytm Payments Bank Limited #	Associates	48.98%	No
41	Infinity Transoft Solution Private Limited	Associates	26.34%	No
42	Seven Technology LLC (w.e.f. February 13, 2025)	Associates	25.00%	No
43	Dinie Correspondente Bancário e Meios de Pagamento Ltda (w.e.f. February 13, 2025) (subsidiary of Seven Technology LLC)	Associates	25.00%	No
44	Eatgood Technologies Private Limited ('Eatgood')	Associates	24.63%	No
45	3Plate Foods Private Limited (subsidiary of Eatgood)	Associates	24.63%	No
46	Massive Mobility Private Limited (w.e.f. December 24, 2025)	Associates	18.99%	No
47	Paytm Foundation	Controlled Trust	-	No

Previously subsidiaries and associates (at any point since April 1, 2024)

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
1	Wasteland Entertainment Private Limited (till August 27, 2024)	Subsidiary	-	No
2	Orbgen Technologies Private Limited (till August 27, 2024)	Subsidiary	-	No
3	Fincollect Services Private Limited (subsidiary of Urja, till January 13, 2026)	Subsidiary	-	No
4	Xceed IT Solution Private Limited (subsidiary of MQ till February 21, 2025)	Subsidiary	-	No
5	Paytm Insuretech Private Limited (till November 28, 2025)*	Associates	-	No

S. No.	Name of the holding / subsidiary / associate companies / joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)
6	Paytm Intelligence Limited (formerly known as Paytm Emerging Tech Limited and earlier Paytm General Insurance Limited) (till October 30, 2025)*	Associates	-	No
7	Paytm Assure Tech Limited (formerly known as Paytm Life Insurance Limited) (till October 30, 2025)*	Associates	-	No
8	Paytm Financial Services Limited ('PFSL') (till November 28, 2025)*	Associates	-	No
9	Admirable Software Limited (subsidiary of PFSL, till December 31, 2025)*	Associates	-	No
10	Foster Payment Networks Private Limited (subsidiary of PFSL, till October 10, 2025) ^*	Associates	-	No
11	Socomo Technologies Private Limited (till March 28, 2025)	Associates	-	No

Notes:

Including NIL (March 31, 2025: 16.78%) held through Admirable Software Limited.

including NIL (March 31, 2025: 15.87%) held through Admirable Software Limited.

including 43.37% (March 31, 2025: 43.37%) held through OCL Tech Platforms Limited (formerly known as One 97 Communications India Limited.)

including 9.98% (March 31, 2025: 9.98%) held through One 97 Communications India Limited. As per Banking Regulation Act, 1949, voting rights in a banking company are capped at 26% in case the investor holds more than 26% in the bank.

^ Including NIL (March 31, 2025: 4.90%) held through Paytm Payments Bank Limited.

^^ The entity is into the business of online gaming. It is a strategic investment which utilises the company's knowledge and expertise in online space.

^^** The entity converted its fully impaired loan into equity of First Games Technology Private Limited ("FGTPL") on April 16, 2026, increasing its aggregate direct and indirect shareholding (through Paytm Services Private Limited) in FGTPL from 55% to 82.6% on a fully diluted basis; this conversion has no financial impact on the Company.

* During the year ended March 31, 2026, the Company undertook an internal group restructuring, pursuant to which the Company acquired 100% stake in Associates / Step down associates and subsidiaries from the Group entities on respective dates. Consequently, these entities became direct, wholly-owned subsidiaries of the Company.

VI. CSR Details

For OCL

24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes[1]

(ii) Turnover (in ₹): 5,825 Crores

(ii) Net worth (in ₹): 13,113 Crores

[1]**Note:** However, the average net profit of OCL made during three (3) immediately preceding financial years is negative and hence, OCL was not statutorily required to spend any amount on CSR activities for the FY 2025-26.

For PPSL

(i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes

(ii) Turnover (in ₹): 5,334.18 Crores[2]

(iii) Net worth (in ₹): 2,480.14 Crores[2]

[2]**Note:** The reported figures are based on restated financials of PPSL that incorporate eight months of revenue from the offline merchant payments business under the holding company i.e OCL. Although the offline merchant payments business was transferred from OCL to PPSL effective from midnight of November 30, 2025, the financial figures have been restated for PPSL as per the applicable accounting standards requiring the disclosure of a full year of operations.

VII. Transparency and Disclosures Compliances

25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2025 - 26 Current Financial Year			FY 2024 - 25 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes, CSR team interacts with community through ongoing engagement during the implementation of development projects and through various volunteering activities	NIL	NIL	NA	NIL	NIL	NA
Investors (other than shareholders)	NA	NA	NA	NA	NA	NA	NA
Shareholders[2]	Yes, **For OCL** https://paytm.com/document/ir/policies-and-guidelines/Investor-Grievance-Redressal-Policy.pdf	11	0	NA	7	0	NA
Employees and workers[1]	Yes, Paytm has an Employee Redressal Management Policy with defined channels to address employee grievances.	347 (OCL: 335 PPSL: 12)	5	All complaints are closed as on date of the report.	771	54	All complaints have been resolved as of the date of the report.
Customers[1&3]	**For OCL** https://paytm.com/company/terms-and-conditions?company=one97&tab=grievance **For PPSL** https://www.paytmpayments.com/policies?tab=grievance	18,948 (OCL: 10,289 PPSL: 8,659)	1,324	It includes all the consumer complaints received as per Question 3 of Principle 9. Source of complaints for "Others" category: **OCL:** L2 and above grievance redressal channels. **PPSL:** L1 complaints, and above grievance redressal channels All 1,324 complaints have been resolved as of the date of the report	9,941	74	All complaints have been resolved as of the date of the report.

Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in place (Yes/No) (If Yes, then provide web-link for grievance redress policy)	FY 2025 - 26 Current Financial Year			FY 2024 - 25 Previous Financial Year		
		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Value Chain Partners[1]	Yes, the Company has a centralized email ID to receive and track grievances from our value chain partners. It forms part of terms and conditions of the purchase order. Additionally, Paytm has a Whistleblower Policy through which grievances can be raised. **For OCL:** https://paytm.com/document/ir/policies-and-guidelines/Whistle_Blower_Vigil_mechanism_policy_2025.pdf **For PPSL:** https://www.paytmpayments.com/policies?tab=wb	NIL	NIL	NA	NIL	NIL	NA

*NA Stands for 'Not Applicable'

[1]**Note:** The stakeholder complaint data reported for FY 2025-26 includes information from both OCL and PPSL, in line with the reporting boundary and consolidation approach adopted for this report.

[2]**Note:** Complaints reported under the 'Shareholder' category pertain solely to OCL on a standalone basis. As PPSL is a wholly owned subsidiary of OCL and does not have any shareholders other than OCL, no shareholder complaints are reported for PPSL.

[3]**Note:** OCL continues to follow its existing reporting methodology, which includes only L2 and above complaints. PPSL reports customer and merchant complaints in accordance with its own Grievance Redressal Policy, including L1, L2, and L3 complaints for the data starting April 1, 2025. Accordingly, complaint volumes between OCL and PPSL are not directly comparable.

26. Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same approach to adapt or mitigate the risk along-with its financial implications, as per the following format

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Customer Satisfaction[1]	Opportunity	**Opportunity:** Building trust through consistent and dependable consumer and merchant experience remains central to the Company's philosophy. As a leading payment and financial service platform the company focuses on creating intuitive, secure and efficient solutions that support everyday financial interactions for consumers and business.	The Company has instituted robust customer engagement and grievance redressal mechanisms supported by continued service enhancement, periodic feedback assessment, and adherence to applicable regulatory standards, thereby ensuring a consistent and reliable customer experience.	**Positive Implication** Sustained customer satisfaction strengthens customer loyalty, enhances brand reputation, and drives higher transaction volumes and retention, thereby supporting revenue growth and market expansion.
2	Product Innovation	Opportunity	**Opportunity:** In a rapidly evolving digital payments and financial services landscape, product innovation is critical to addressing dynamic customer needs, sustaining competitive advantage, and capturing emerging market opportunities. It enables the Company to enhance customer experience, expand its service portfolio, and reinforce its leadership position within the sector.	The Company invests in technology and product development to deliver innovative, secure, and user friendly solutions across payments, financial services, and merchant offerings, thereby supporting sustained business growth and long term value creation.	**Positive Implication** The company addresses evolving customer needs by introducing digital products and features such as AI-powered merchant acquisition signals, AI-led quality control for risk profiling of merchants, and a home-screen Digital QR feature adoption for accepting payments etc.This has helped the Company in expanding the service offerings, and captures emerging market opportunities. These initiatives support revenue growth, enhance competitive advantage, and drive long-term value creation in a rapidly evolving digital financial landscape.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
3	Regulatory Compliance[1]	Opportunity & Risk	**Opportunity:** Effective management of regulatory compliance is fundamental to mitigating legal risks, fostering stakeholder trust, and safeguarding market reputation. Highlighting this commitment, Paytm Payments Services Limited (PPSL) maintains active membership in the Self-Regulated PSO Association (SRPA)—which was officially recognized by the RBI as the Self-Regulatory Organisation (SRO) for Payment System Operators on November 11, 2025. Through this alignment, PPSL strictly adheres to all evolving industry benchmarks and regulatory mandates. **Risk:** As regulations evolve, the Company must identify applicable requirements and adapt accordingly. Failure to identify and fulfill regulatory requirements can negatively impact the Company's business.	The Company has instituted a robust compliance framework, supported by structured monitoring, timely identification of applicable laws and regulations, internal reviews and audits, and engagement with regulators, thereby ensuring adherence to all applicable regulatory requirements and upholding the highest standards of ethical and lawful business conduct.	**Positive Implication** Mitigating operational disruptions and financial penalties through a proactive approach to regulatory compliance serves as a fundamental pillar for Paytm's financial stability. A critical milestone reinforcing this framework was the Reserve Bank of India (RBI) granting a Certificate of Authorisation to Paytm Payments Services Limited (PPSL) to operate as a 'Payment Aggregator,' effective November 26, 2025. **Negative Implication** Non-compliance with applicable laws and evolving regulatory requirements may result in monetary penalties, legal proceedings, restrictions on business activities, and reputational harm, thereby adversely impacting the Company's financial performance and operational continuity.
4	Corporate Governance and Ethics[1]	Opportunity and Risk	**Opportunity:** Corporate Governance is fundamental to ensuring regulatory compliance, ethical conduct, and transparency in business operations. Strong governance practices reinforce stakeholder trust, safeguard the Company's reputation, and support long term and sustainable value creation. **Risk:** Ineffective corporate governance can lead to regulatory non-compliance, unethical behavior, and a lack of operational transparency. Such failures may reduce stakeholder trust, compromising the Company's reputation, and eroding long-term, sustainable value creation.	The Company upholds the highest standards of governance through a comprehensive Code of Conduct, well defined policies, structured Board and Committee oversight, and robust internal controls, thereby fostering a culture of integrity, accountability, and responsible decision making.	**Positive Implication** Robust corporate governance and ethical business conduct enhance stakeholder trust, strengthen regulatory standing, and mitigate legal and reputational risks, thereby supporting business resilience, investor confidence, and long term and sustainable financial performance. **Negative Implication** Any lapse in governance or ethical conduct may give rise to regulatory penalties, legal proceedings, reputational harm, and erosion of stakeholder trust, thereby adversely impacting the Company's financial performance, investor confidence, and long term business sustainability.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
5	Cybersecurity & Secure Transactions[1]	Opportunity and Risk	**Opportunity:** Regulatory compliance, build customer confidence in secure digital transactions. Adopting Security Scorecard (a continuous security ratings platform) alongside CloudSEK (an AI-driven threat intelligence platform) will further strengthen the Company's overall cybersecurity ecosystem. Complementing the Company's existing security governance, preventive, detective, and response controls, these platforms enhance continuous security monitoring, external threat detection, digital risk protection, and third-party risk management. Collectively, the Company's cybersecurity controls improve resilience against evolving cyber threats, accelerate incident response, safeguard critical information assets, reinforce reactions, and position cybersecurity as a strategic business enabler that supports innovation, sustainable growth, and long-term stakeholder trust. **Risk:** As a major leading digital financial services provider, the Company operates in a dynamic cyber threat environment due to its extensive digital presence, internet-facing assets, and reliance on a broad third-party ecosystem. The large volume of sensitive customer and transaction data it processes increases exposure to threats such as phishing, brand impersonation, fake applications, data leakage, supply chain compromises, misconfigurations, and dark web activities. Continuous monitoring of the external attack surface, digital footprint, and third-party ecosystem is therefore essential to identify and mitigate emerging risks before they can be exploited. Failure to detect and address such threats in a timely manner could result in fraud, data breaches, regulatory non-compliance, financial losses, reputational harm, and disruption to business operations, ultimately impacting customer trust and organizational resilience.	The Company maintains a robust cybersecurity, data privacy, and third-party risk framework aligned with ISO 27001:2022, ISO 27017:2015, and the IT Act 2000. To strengthen cyber resilience, it uses Security Scorecard for continuous monitoring of its external attack surface and vendors, alongside CloudSEK's AI platform to proactively detect threats like phishing, brand impersonation, fake apps, data leaks, and dark web exposure. Supported by advanced controls, risk assessments, and employee awareness, this framework ensures proactive mitigation, enhances incident readiness, and safeguards digital infrastructure and stakeholder data.	**Positive Implication** Continuous security monitoring, proactive threat intelligence, and strong compliance collectively enhance the Company's resilience against evolving cyber risks. Independent security ratings provide measurable insights to identify vulnerabilities and third-party risks early, while supporting regulatory and customer due diligence. Complementing this, proactive detection and takedown of external threats—like phishing, brand impersonation, and data leaks—reduce fraud and improve incident readiness. Together with regulatory compliance, these capabilities protect the Company's brand, reinforce stakeholder trust, and mitigate legal, financial, and reputational risks, ultimately driving sustainable business growth and long-term financial performance. **Negative Implication** Cybersecurity incidents from internal vulnerabilities, external threats, or vendor compromises—such as data breaches, phishing, fake apps, data leaks, attack surface vulnerabilities,service disruptions and dark web exposure—can cause fraud, financial loss, regulatory penalties, and reputational damage. Failure to continuously monitor and mitigate these risks can severely impact the Company's operational resilience, financial performance, and long-term business continuity in a digital environment.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
6	Employee Development & Wellbeing	Opportunity	**Opportunity:** As a technology and innovation-driven organization, our growth is deeply anchored in the capability enhancement, and holistic well-being of our workforce. Providing a safe, inclusive, and supportive work environment, alongside robust continuous learning initiatives, directly enhances employee productivity, boosts morale, and improves retention while driving overall organizational excellence.	The Company invests in structured training and development programmes, health and wellness initiatives, and robust grievance redressal mechanisms, thereby fostering a motivated, skilled, and future ready workforce that supports long term and sustainable business growth.	**Positive Implication** Strategic investments in comprehensive employee development and well-being initiatives significantly enhance workforce capability and retention. This directly reduces recruitment and onboarding costs, drives operational efficiencies and contributes to sustained top-line growth and long-term shareholder value creation.
7	Financial Inclusion and Empowering SMEs	Opportunity	**Opportunity:** As a digital financial services provider, the Company is uniquely positioned to advance financial inclusion by extending access to digital payments, credit, insurance, and allied financial services to underserved consumers, merchants, and Small and Medium Enterprises (SMEs). This presents a significant opportunity to drive economic empowerment, expand market reach, and contribute to inclusive and sustainable economic growth.	The Company continues to invest in innovative payment solutions, digital onboarding, and tailored financial offerings for SMEs and underserved segments, supported by awareness initiatives that strengthen digital and financial literacy across the broader ecosystem.	**Positive Implication** Advancing financial inclusion and empowering Small and Medium Enterprises (SMEs) enables the Company to expand its customer and merchant base, diversify its revenue streams, and strengthen long term business growth, while contributing meaningfully to inclusive and sustainable economic development.
8	Climate Change	Risk	**Risk:** The evolving regulatory requirements, change in temperature, irregular precipitations and extreme weather events may disrupt digital infrastructure and affect operational continuity. Furthermore, transition risks arising from evolving climate regulations, enhanced ESG compliance requirements, and shifting stakeholder expectations may result in increased compliance costs, strategic realignments, and potential reputational implications.	Climate change can be addressed through regular monitoring of Greenhouse Gas emission. Additionally, the Company provides ESG training to its value chain partners to increase awareness on topics like climate change and energy management. The Company has also planned to execute Climate related projects.	**Negative Implication** Extreme climate events may disrupt operational continuity leading to potential revenue loss and increased recovery and infrastructure costs. Additionally, evolving regulatory requirements like carbon-related compliances, increase operational expenditures.

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
9	Circular Economy and Waste Management	Opportunity and Risk	**Opportunity:** Implementing the waste collection plans aligned with the Central Pollution Control Board's (CPCB) Extended Producer Responsibility (EPR) rule, the Company ensures ethical disposal of wastes like Electronic waste, Battery waste etc. Additionally, as a digital financial service Company, our innovative products promote paper reduction. **Risk:** The Company's operations generate electronic waste, and battery waste, arising from devices such as Soundboxes, POS machines. Inadequate management of such waste may give rise to regulatory non compliance, increased operational costs, and reputational risks, particularly under the evolving Extended Producer Responsibility (EPR) framework.	The Company has instituted a structured takeback mechanism, whereby devices that are non-functional or returned upon discontinuation of services are routed back to its warehouses. The returned devices are duly inspected and refurbished, wherever feasible, for redeployment. Devices that cannot be refurbished are channeled to authorized CPCB registered recyclers for responsible processing and recycling, in alignment with applicable CPCB amended EPR Rules.	**Positive Implication** Conversely, the adoption of device refurbishment, takeback mechanisms, and partnerships with authorized recyclers, enables the Company to optimize resource utilization and reduce operational costs. **Negative Implication** Inadequate management of E-waste, battery waste, may result in regulatory non-compliance, increased disposal costs, and reputational risks, thereby adversely impacting the Company's financial performance.

Note: OCL periodically undertakes ESG Materiality Assessment to identify and prioritize ESG material topics. This includes an assessment of key ESG impacts, risks and opportunities for the organization followed by consultations with key stakeholders to incorporate their feedback.

[1]**Note:** The prioritized ESG material topics disclosed in this report are integrated into One 97 Communications Limited's (OCL's) Risk Management framework and are periodically reviewed as part of OCL's risk management process.

SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Policy and management processes									
1. a. Whether your entity's policy/ policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
c. Web Link of the Policies, if available	**OCL** https://ir.paytm.com/policies-and-guidelines **PPSL** https://www.paytmpayments.com/policies?tab=dei Refer Table 1 for policy details								
2. Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes
4. Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle.	All policies have been developed with thorough consideration of industry's best practices, regulatory mandates, and extensive consultation with pertinent stakeholders. Additionally, the Company adheres to the ISO 27001:2022 standards, ensuring compliance with information security protocols.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	Refer table 2 for specific targets and performance.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.									
Governance, leadership and oversight									
7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure)	Paytm's BRSR for the Financial Year 2025-26, reflects our continued commitment to building a responsible, resilient, and purpose driven enterprise. Guided by our vision of advancing financial inclusion and digital empowerment, we continue to deliver innovative payment and financial services that contribute meaningfully to the broader economy. The year under review has witnessed steady progress in embedding Environmental, Social, and Governance (ESG) considerations into the core of our business strategy. Our ESG Committee, functioning under the guidance of the CSR Committee and the Board of Directors, continues to provide strategic direction and oversight on our sustainability agenda, ensuring that ESG priorities are meaningfully reflected across our policies, practices, and operations.								

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
	On the environmental front, we remain focused on responsible waste management aligned with the Extended Producer Responsibility framework, and the adoption of globally recognized standards of energy efficiency. Our continued association with the United Nations Environment Programme (UNEP) further reaffirms our commitment to environmental stewardship. On the social front, our endeavors remain anchored in the well being of our people and the communities we serve, supported by meaningful CSR interventions in education, digital literacy, healthcare, and inclusion, and reinforced by our commitment to fostering a safe, inclusive, and equitable workplace for the employees. On the governance front, our practices continue to be guided by the highest standards of integrity, transparency, and ethical conduct, underpinned by a comprehensive Code of Conduct, structured grievance redressal and whistleblower mechanisms, and a robust information security and data privacy framework. As we look ahead, we remain committed to deepening our ESG journey, strengthening our governance frameworks, and creating long term value for all our stakeholders. Paytm extends sincere gratitude to employees, customers, merchants, regulators, partners, and shareholders for their unwavering trust and support. Together, we shall continue to build a more inclusive, responsible, and sustainable future.								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Yes, the CSR Committee of the Board is responsible for overseeing the ESG related initiatives at OCL, while the ESG Committee at OCL focuses on implementation and monitoring of these initiatives.								
9. Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes/No). If yes, provide details.	**Composition of CSR Committee:** 1: Mr. Gopalasamudram S Sundararajan, Independent Director, Chairman ; DIN No: 00361030 2: Ms. Manisha Raj Raisinghani, Independent Director, Member; DIN No. 06798956 3: Mr. Vijay Shekhar Sharma, Chairman, MD & CEO, Member ; DIN No: 00466521								

10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									Frequency (Annually (A)/ Half yearly (H)/ Quarterly (Q)/ Any other – please specify)								
	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
Performance against Above policies and follow up action	Committee of Board									Q	A	Q	Q	Q	A	A	A	Q
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Committee of Board									Q	A	Q	Q	Q	A	A	A	Q

		P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
11.	Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide the name of the agency.	Yes, Paytm has undertaken a Reasonable Assurance on BRSR Core KPI's and Limited Assurance on Essential & Leadership indicators of Principle 1-9 with SGS India Private Limited. However, the Company has not undertaken independent assessment/evaluation of its policies by an external agency.								

12. If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:

Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
The entity does not consider the principles material to its business (Yes/No)	Not Applicable since answer to question (1) above is Yes								
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/ No)									
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)									

TABLE 1: Policies Aligned to NGRBC Principles

Principle	Paytm Policy
Principle 1	1. Code of Conduct for Board of Directors and the Senior Management Team for OCL 2. Code of Conduct for OCL & PPSL 3. Anti-Bribery and Anti-Corruption Policy for OCL & PPSL 4. Conflict of Interest Policy for OCL & PPSL 5. Code of Conduct to regulate monitor and report trading by designated persons and their immediate relatives for OCL 6. Code of practices and procedures for fair disclosure of unpublished price sensitive information for OCL 7. Risk Assessment and Management Policy for OCL 8. Policy on Familiarization Programme for Independent Directors, Role, Responsibility and Rights of Independent Directors for OCL 9. Policy on Related Party Transactions for OCL
Principle 2	1. ESG Policy for OCL[1]
Principle 3	1. Equal Opportunity for Persons with Disabilities for OCL & PPSL 2. Diversity, Equity and Inclusion Policy for PPSL 3. Vigil Mechanism/Whistle Blower Policy for OCL & PPSL 4. Employee Learning & Development Policy for OCL & PPSL[1] 5. Employee Grievance Redressal Policy for OCL & PPSL[1] 6. Consequence Management Policy for OCL & PPSL[1] 7. Grievance Mechanism Policy for PPSL 8. ESG Policy for OCL[1]
Principle 4	1. Stakeholder Engagement Policy for OCL [1] 2. Policy on Material Events and Information for OCL
Principle 5	1. Policy on Prevention of Sexual Harassment of Women at Workplace (POSH) for OCL & PPSL 2. Code of Conduct for OCL & PPSL 3. Employee Grievance Redressal Policy for OCL & PPSL[1] 4. Equal Opportunity for Persons with Disabilities for OCL & PPSL
Principle 6	1. ESG Policy for OCL[1] 2. Risk Assessment and Management Policy for OCL

Principle	Paytm Policy
Principle 7	1. Code of Conduct for OCL & PPSL
Principle 8	1. Corporate Social Responsibility Policy for OCL & PPSL
Principle 9	1. Acceptable Usage Policy for OCL 2. Privacy Policy for OCL & PPSL 3. Information Security Policy for OCL 4. Cyber Risk Insurance Policy for OCL[1] 5. Customer Grievance Redressal Policy for OCL & PPSL 6. KYC/AML Policy for PPSL[1]

[1]**Note:** Policies are available in Paytm's intranet and with respective departments for internal stakeholders.

TABLE 2: Progress on Targets

S. No.	Material Topic	Targets	Performance
1	Product Innovation	Enable paper slips saving through Paytm's digital payment infrastructure.	Paytm has enabled paper slips saving worth 33.15 million pounds in FY 2025-26
2	Climate Change	Foster institutional partnerships to support air quality programs.	OCL has allocated Rs. 2.02 Crores to UNEP (United National Environment Programme) under the Air Quality Action Forum (AQAF) project focusing on operationalization of partnerships, technical support activities and enhanced stakeholder engagements.[1]
3	Waste Management	100% compliance with EPR (Extended Producer Responsibility) obligations	The company is compliant to EPR obligations during FY 2025-26.
		Ensure that the E-Waste generated from Paytm's operations is recycled through authorized vendors.	During FY 2025-26 Paytm has recycled 383.56 MT of E-Waste through authorised recyclers.
4	Corporate Governance & Ethics	Stronger Corporate Governance: Uphold multi-layer governance mechanism for robust Corporate Governance.	OCL has a dedicated ESG Committee focusing on implementing and monitoring of ESG initiatives. This committee reports to the CSR committee of the Board.
		Ensure Paytm employees are covered under mandatory compliance training.	96% of the employees have completed mandatory compliance training during FY 2025-26.[2]
5	Cyber Security	Drive ongoing compliance and actively maintain ISO 27001:2022 (Information Security Management System) certification through continuous monitoring, improvement, and adherence to required controls and standards.	The Company has maintained its ISO 27001:2022 certification through continuous monitoring, improvement, and adherence to required controls and standards.
		Ensure zero data breaches resulting in disclosure of personal data of customers.	There were no data breaches during FY 2025-26.
6	Employee Development and Wellbeing	Drive employee upskilling and development by ensuring at least 40% of the workforce is actively covered under structured training programs each year.	81.35% of employees have undertaken skill upgradation training during FY 2025-26.

[1]**Note:** Project funding was allocated to Paytm Foundation during FY 2024–25. Implementation commenced in FY 2025–26 and will continue through 2027.

[2]**Note:** As on date of the report 99.91% of employees have completed the compliance training under OCL and PPSL.

SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally and ethically responsible.

PRINCIPLE 1

Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.

Essential Indicators

1. Percentage coverage by training and awareness programmes on any of the Principles during the financial year:

OCL

Segment	Total number of training and awareness programmes held[2]	Topics /principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	6	During the year, the Board of Directors (BoD) underwent Annual governance familiarization program which includes topics like: Code of Conduct policy relevant to directors, Conflict of Interest, Anti-Bribery and Corruption (ABAC), Confidentiality, Insider Trading, ESG and other policies available on the website.	100.00%
Key Managerial Personnel	6	During the year, the Key Managerial Personnel (KMP), underwent training on: Code of Conduct, Anti-Bribery and Corruption (ABAC), Data Privacy, Prevention of Sexual Harassment (POSH), Cybersecurity & Acceptable Device Usage and Insider Trading.	100.00%
Employees other than BoD and KMPs[1]	6	For employees other than the Board of Directors and Key Managerial Personnel, we conduct regular sessions focused on organizational risk mitigation and safety. These sessions aim to raise awareness on various topics, including the Company Code of Conduct, Anti-Bribery and Corruption (ABAC), Acceptable Device Usage, Data Privacy, Cybersecurity and Prevention of Sexual Harassment (POSH).	99.52%[3]
Workers	NA	NA	NA

PPSL

Segment	Total number of training and awareness programmes held[2]	Topics /principles covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors	6	During the year, the Board of Directors underwent training on: Code of Conduct, Anti-Bribery and Corruption (ABAC), Data Privacy, Prevention of Sexual Harassment (POSH), Cybersecurity, Acceptable Device Usage.	83.33%[4]
Key Managerial Personnel	7	During the year, the Key Managerial Personnel, underwent training on: Code of Conduct, Anti-Bribery and Corruption (ABAC), Data Privacy, Prevention of Sexual Harassment (POSH), Cybersecurity, Acceptable Device Usage, Anti-Money Laundering (AML)	100.00%
Employees other than BoD and KMPs[1]	7	For employees other than the Board of Directors (BoD) and Key Managerial Personnel (KMPs), we conduct regular sessions focused on organizational risk mitigation and safety. These sessions aim to raise awareness on various topics, including the Company Code of Conduct, Anti-Bribery and Corruption (ABAC), Acceptable Device Usage, Data Privacy, Cybersecurity, Prevention of Sexual Harassment (POSH), Anti-Money Laundering (AML)	94.23%[3]
Workers	NA	NA	NA

[1]**Note:** The completion status is based on employee records as of 31st Mar'26.

[2]**Note:** The total number of training and awareness programmes held is the count of topics covered at each level.

[3]**Note:** As on date of the report 99.91% of employees have completed the compliance training under OCL and PPSL.

[4]**Note:** Out of 6 Board of Directors, 5 of the Board members have completed the training.

2. **Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):**

Monetary					
Particulars	**NGRBC Principle**	**Name of the regulatory/ enforcement agencies/ judicial institutions**	**Amount (In ₹)**	**Brief of the Case**	**Has an appeal been preferred? (Yes/No)**
Penalty/ Fine	Principle 1	Joint Commissioner, Central Goods & Services Tax, Noida	₹ 2,74,604	Joint Commissioner, Central Goods & Services Tax, Noida issued a Demand Order on December 15, 2025, imposing a GST demand of ₹ 12,88,965 (Rupees Twelve Lakhs Eighty Eight Thousand Nine Hundred and Sixty Five only) and penalty of ₹ 2,74,604 (Rupees Two Lakhs Seventy Four Thousand Six Hundred and Four only) on the company under Section 74 of the Goods and Services Tax Act, 2017 for the tax period FY 2019-20. Violation: Alleged Excess input tax credit availment by the company and wrong Inter Head of GST Liability.	No

Monetary					
Particu-lars	**NGRBC Principle**	**Name of the regulatory/ enforcement agencies/ judicial institutions**	**Amount (In ₹)**	**Brief of the Case**	**Has an appeal been preferred? (Yes/No)**
Penalty/ Fine	Principle 1	Joint Commissioner, Central Goods & Services Tax, Noida	₹ 20,000	Joint Commissioner, Central Goods & Services Tax, Noida issued a Demand Order on December 4, 2025, imposing a GST demand of ₹ 14,46,451 (Rupees Fourteen Lakhs Forty Six Thousand Four Hundred and Fifty One only) and penalty of ₹ 20,000 (Rupees Twenty Thousand only) on the company under Section 73 of the Goods and Services Tax Act, 2017 for the tax period FY 2021-22. Violation: Demand In Relation to RCM (Reverse Charge Mechanism), Alleged Excess input tax credit availment by the company and Interest on non payment to creditor within 180 days.	No
	Principle 1	Assistant Commissioner, Central Goods & Services Tax, Tamil Nadu	₹ 20,000	Assistant Commissioner, Central Goods & Services Tax, Tamil Nadu issued a Demand Order on December 26, 2025, imposing a GST demand of ₹ 46,634 (Rupees Forty Six Thousand Six Hundred and Thirty Four only) and penalty of ₹ 20,000 (Rupees Twenty Thousand only) on the company under section 73 of the Goods and Services Tax Act, 2017 for the tax period FY 2021-22. Violation: Alleged Excess input tax credit availment by the company.	No
	Principle 1	Excise and Taxation Officer, Gurgaon	₹ 2,36,423	Excise and Taxation Officer, Gurgaon issued a Demand Order on March 20, 2026, imposing a GST demand of ₹ 2,36,423 (Rupees Two Lakhs Thirty Six Thousand Four Hundred and Twenty Three only) and penalty of ₹ 2,36,423 (Rupees Two Lakhs Thirty Six Thousand Four Hundred and Twenty Three only) on the company. Violation: Alleged Excess input tax credit availment by the company.	No
	Principle 1	Government Labour Officer and Minimum Wages Inspector, Ahmedabad.	₹ 12,000	Government Labour Officer and Minimum Wages Inspector, Ahmedabad, imposed a fine of ₹ 12,000 (Rupees Twelve Thousand only) on September 15, 2025. Violation: Convicted under Section 275 of the BNSS for the offence under Section 22(A) of the Minimum Wages Act.	No
Penalty/ Fine	Principle 1	Office of the Commissioner of Central Goods & Service Tax, Appeals – 1, Delhi.	Penalty amount on One 97 Communications Limited: ₹ 59,69,889 Penalty amount on CEO: ₹ 59,69,889	Penalty Demand Order dated February 03, 2025 was issued alleging non-compliance under Section 74 of the Central Goods and Services Tax Act, 2017 in relation to the tax periods FY 2020-21, FY 2021-22 and FY 2022-23, primarily concerning the alleged non-compliance in issuance of tax invoices by the company to its customers. Subsequently, the said Demand Order was modified and the penalty demand on the company was reduced from ₹ 1,19,39,778 (Rupees One Crore Nineteen Lakhs Thirty-Nine Thousand Seven Hundred Seventy-Eight only) to ₹ 59,69,889 (Rupees Fifty-Nine Lakhs Sixty-Nine Thousand Eight Hundred Eighty-Nine only). Further, the penalty demand on the CEO was also reduced from ₹ 59,94,889 (Rupees Fifty-Nine Lakhs Ninety-Four Thousand Eight Hundred Eighty-Nine only) to ₹ 59,69,889 (Rupees Fifty-Nine Lakhs Sixty-Nine Thousand Eight Hundred Eighty-Nine only).	Yes

Monetary					
Particu-lars	**NGRBC Principle**	**Name of the regulatory/ enforcement agencies/ judicial institutions**	**Amount (In ₹)**	**Brief of the Case**	**Has an appeal been preferred? (Yes/No)**
Penalty/ Fine				OCL and Mr. Vijay Shekhar Sharma have challenged the said orders by way of separate appeals filed with GSTAT (Goods and Services Tax Appellate Tribunal) on June 27, 2026. The matter is pending before GSTAT.	
Settlement	Principle 1	Securities and Exchange Board of India ("SEBI")	Settlement Amount paid by One 97 Communications Limited : ₹ 1,11,15,000 Settlement Amount paid by Mr. Vijay Shekhar Sharma: ₹ 1,11,15,000 Settlement Amount paid by Mr. Ajay Shekhar Sharma: ₹ 57,11,425	During the FY 2023- 24, the One 97 Communication Limited, received a Show Cause Notice ("SCN") from the SEBI, inter alia, challenging the grant of ₹ 2,10,00,000 (Rupees Two Crores Ten Lakhs only) ESOPs to Mr. Vijay Shekhar Sharma, Chairman, Managing Director & CEO, of the OCL and grant of ₹ 2,26,582 (Rupees Two Lakhs Twenty Six Thousand Five Hundred Eighty Two only) ESOPs to Mr. Ajay Shekhar Sharma, relative of Mr. Vijay Shekhar Sharma, being in compliance with SEBI SBEB Regulations. In furtherance to this, the OCL, Mr. Vijay Shekhar Sharma & Mr. Ajay Shekhar Sharma (Applicants) initiated the settlement proceedings with SEBI in terms of SEBI (Settlement Proceedings) Regulations, 2018 ('the Settlement Regulations'). Also, Mr. Vijay Shekhar Sharma and Mr. Ajay Shekhar Sharma have informed the listed entity that they have voluntarily forgone their respective unexercised ESOPs i.e. ₹ 2,10,00,000 (Rupees Two Crores Ten Lakhs only) and ₹ 2,22,862 (Rupees Two Lakhs Twenty Two Thousand Eight Hundred Sixty Two only) ESOPs granted to them under One 97 Employees Stock Option Scheme 2019, and subsequently, on May 8, 2025, as per the SEBI Settlement Order, the OCL and Mr. Vijay Shekhar Sharma and Mr. Ajay Shekhar Sharma have settled the matter with SEBI without admitting or denying the findings of fact and conclusions of law, in accordance with SEBI (Settlement Proceedings) Regulations, 2018. The necessary settlement amount was paid. The necessary Stock Exchange disclosure along with the Settlement Order was also filed with Stock Exchanges on May 8, 2025. Additionally, the details of Mr. Ajay Shekhar Sharma, who is a relative of Mr. Vijay Shekhar Sharma, Chairman, Managing Director & CEO of the company, have also been provided herein.	No
Com-pounding fee	Principle 1	Reserve Bank of India ("RBI")	₹ 18,76,000	Pursuant to Section 13 read with Section 15 of the Foreign Exchange Management Act, 1999 ("FEMA"), RBI vide its order dated February 2, 2026 has compounded the contravention under Regulation 5(1) read with Regulation 13 of FEMA 120/RB-2004. The RBI has imposed a compounding fee of ₹ 18.76 lakhs (Rupees Eighteen Lakhs Seventy Six Thousand) in respect of transactions where the underlying transaction value was a sum of approximately ₹ 33 Crores (Rupees Thirty Three Crores).	No

Note: The above Penalties/Fines, Settlement & Compounding Fees pertains to OCL.

Non-Monetary				
Particulars	**NGRBC Principle**	**Name of the regulatory/ enforcement agencies/ judicial institutions**	**Brief of the Case**	**Has an appeal been preferred? (Yes/No)**
Imprisonment	Principle 1-9	NIL	No Case	NIL
Punishment	Principle 1-9	NIL	No Case	NIL

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
Penalty Demand Order dated February 03, 2025 was issued alleging non-compliance under Section 74 of the Central Goods and Services Tax Act, 2017 in relation to the tax periods FY 2020-21, FY 2021-22 and FY 2022-23, primarily concerning the alleged non-compliance in issuance of tax invoices by the company to its customers. Subsequently, the said Demand Order was modified and the penalty demand on the company was reduced from ₹1,19,39,778 (Rupees One Crore Nineteen Lakhs Thirty-Nine Thousand Seven Hundred Seventy-Eight only) to ₹59,69,889 (Rupees Fifty-Nine Lakhs Sixty-Nine Thousand Eight Hundred Eighty-Nine only). Further, the penalty demand on the CEO was also reduced from ₹59,94,889 (Rupees Fifty-Nine Lakhs Ninety-Four Thousand Eight Hundred Eighty-Nine only) to ₹59,69,889 (Rupees Fifty-Nine Lakhs Sixty-Nine Thousand Eight Hundred Eighty-Nine only). OCL and Mr. Vijay Shekhar Sharma have challenged the said orders by way of separate appeals filed with GSTAT (Goods and Services Tax Appellate Tribunal) on June 27, 2026. The matter is pending before GSTAT.	Office of the Commissioner of Central Goods & Service Tax, Appeals – 1, Delhi.

Note: The details of the instances disclosed in the above table pertains to OCL.

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

Yes, the Company has instituted a comprehensive Anti-Bribery and Anti-Corruption Policy. The Policy underscores Paytm's commitment to conducting business with the highest standards of integrity, transparency, and ethical conduct, and reflects a zero-tolerance approach towards bribery and corruption in any form, whether undertaken directly or indirectly through third parties.

The Policy is applicable to One 97 Communications Limited, its subsidiaries including PPSL and affiliates that have adopted it, and extends to all internal and external stakeholders, including directors, employees, vendors, consultants, intermediaries, and business partners.

The key principles enshrined in the Policy are as follows:

- Prohibition of bribery, facilitation payments, and any form of corrupt practice;
- Clear guidelines governing gifts, hospitality, sponsorships, and charitable contributions, with prescribed approval thresholds;
- Express prohibition on political contributions;
- Mandatory due diligence and incorporation of ABAC clauses in third-party contractual arrangements;
- Maintenance of accurate books of account and robust internal financial controls;
- Periodic training and annual compliance declarations by internal stakeholders;
- A confidential Whistleblower / Vigil Mechanism, independently administered, to enable the reporting of suspected violations without fear of retaliation; and
- Strict disciplinary action, including termination and legal recourse, in the event of any breach.

The Policy is subject to periodic review to ensure its continued alignment with applicable laws and regulations.

The Anti-Bribery and Anti-Corruption Policy, 2025, may be accessed at the following links

1. Anti-Bribery and Anti-Corruption Policy for OCL
2. Anti-Bribery and Anti-Corruption Policy for PPSL

5. **Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:**

Particulars	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Directors	NIL	NIL
KMPs	NIL	NIL
Employees	NIL	NIL
Workers	NA	NA

6. **Details of complaints with regard to conflict of interest:**

Particulars	FY 2025 - 26 Current Financial Year		FY 2024 - 25 Previous Financial Year	
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	NIL			
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	NIL			

7. **Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest**

   NIL

8. **Number of days of accounts payables ((Accounts payable *365) / Cost of goods/services procured) in the following format:**

For OCL

Particulars	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Number of days of accounts payables	53.09	62.40

For PPSL[1]

Particulars	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Number of days of accounts payables	51.57	41.96

[1]**Note:** The reported figures are based on restated financials of PPSL that incorporate eight months of revenue from the offline merchant payment business under the holding company i.e OCL. Although the offline merchant payment business was transferred from OCL to PPSL effective from midnight of November 30, 2025, the financial figures have been restated for PPSL as per the applicable accounting standards requiring the disclosure of a full year of operations.

9. **Open-ness of business**

Provide details of concentration of purchases and sales with trading houses, dealers and related parties along-with loans and advances & investments, with related parties, in the following format:

For OCL

Parameter	Metrics	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	NA	NA
	b. Number of trading houses where purchases are made from	NA	NA
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NA	NA
Concentration of Sales	a. Sales to dealers/ distributors as % of total sales	NA	NA
	b. Number of dealers /distributors to whom sales are made	NA	NA
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	NA	NA
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.01%	0.04%
	b. Sales (Sales to related parties / Total Sales)	3.29%	2.09%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)[1]	92.15%	84.33%
	d. Investments (Investments in related parties / Total Investments made)[2]	46.49%	21.80%

[1]**Note:** Loans and Advances are only to the subsidiaries/Joint Venture of OCL.

[2]**Note:** Investments are made in the group companies.

For PPSL[1]

Parameter	Metrics	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Concentration of Purchases	a. Purchases from trading houses as % of total purchases	NA	NA
	b. Number of trading houses where purchases are made from	NA	NA
	c. Purchases from top 10 trading houses as % of total purchases from trading houses	NA	NA
Concentration of Sales	a. Sales to dealers/ distributors as % of total sales	NA	NA
	b. Number of dealers /distributors to whom sales are made	NA	NA
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	NA	NA
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	NA	NA
	b. Sales (Sales to related parties / Total Sales)	6.29%	2.19 %
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	NA	NA
	d. Investments (Investments in related parties / Total Investments made)	NA	NA

[1]**Note:** The reported figures are based on restated financials of PPSL that incorporate eight months of revenue from the offline merchant payments business under the holding company i.e OCL. Although the offline merchant payments business was transferred from OCL to PPSL effective from midnight of November 30, 2025, the financial figures have been restated for PPSL as per the applicable accounting standards requiring the disclosure of a full year of operations.

Leadership Indicators

1. Awareness programmes conducted for value chain partners on any of the Principles during the financial year:

Total number of awareness programmes held	Topics / principles covered under the training	% age of value chain partners covered (by value of business done with such partners) under the awareness programmes
2	**Environment:** • Energy and Fuel usage • Greenhouse Gas Management • Water and Waste Management • Environmental Compliance **Social:** • Workforce Profile • Diversity Equity & Inclusion • Health & Safety • Grievance Mechanisms • Labour & Human Rights Safeguards **Governance:** • Code of Conduct & Business Ethics • Anti-bribery & anti-corruption • Whistleblower/grievance channels • Data security & privacy • Third-party risk management	Awareness and training programs on sustainability were conducted for all suppliers comprising 2% or more of the OCL's & PPSL's purchases (by value) in each case.

2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If yes, provide details of the same

Yes, OCL adopts a strong and proactive approach to manage conflicts of interest as part of its corporate governance framework. Paytm's Code of Conduct establishes clear guidelines for identifying, disclosing and addressing potential conflicts at the level of the Board of Directors and Senior Management, ensuring that all decisions are taken with objectivity, impartiality and transparency.

Leaders must ensure that personal or financial interests and external affiliations do not conflict, or appear to conflict, with their responsibilities. Any actual or potential conflicts must be disclosed promptly. Where conflicts arise, individuals must inform the Board, and seek necessary approvals as per legal requirements and OCL's policies.

Code of Conduct for Directors and Senior Management is available on OCL's website at:

https://paytm.com/document/ir/policies-and-guidelines/Code-of-Conduct-for-Board-and-Senior-Management_26.03

PRINCIPLE 2

Businesses should provide goods and services in a manner that is sustainable and safe

Essential Indicators

1. **Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

For OCL

Particulars	FY 2025 – 26 Current Financial Year	FY 2024 – 25 Previous Financial Year	Details of improvements in environmental and social impacts
R&D	0.00%	0.00%	
Capex	94.88%	78.20%	Measures undertaken by Paytm including transition to software solutions, enhanced data management and adoption of Electronic Data Capture (EDC) devices, Soundbox etc have resulted in paper savings.

For PPSL[1]

Particulars	FY 2025 – 26 Current Financial Year	FY 2024 – 25 Previous Financial Year	Details of improvements in environmental and social impacts
R&D	0.00%	NA	
Capex	98.00%	NA	Measures undertaken by Paytm including transition to software solutions, enhanced data management and adoption of Electronic Data Capture (EDC) devices, Soundbox etc have resulted in paper savings.

[1]**Note:** The reported figures are based on restated financials of PPSL that incorporate eight months of revenue from the offline merchant payments business under the holding company i.e OCL. Although the offline merchant payments business was transferred from OCL to PPSL effective from midnight of November 30, 2025, the financial figures have been restated for PPSL as per the applicable accounting standards requiring the disclosure of a full year of operations.

2. a. **Does the entity have procedures in place for sustainable sourcing? (Yes/No)**

   Wherever feasible, the entity tries to incorporate sustainable sourcing in its operations.

   b. **If yes, what percentage of inputs were sourced sustainably?**

   The Company has a robust Purchase Policy, which ensures that inputs are sourced responsibly. Our vendor selection process is guided by a structured validation, promoting transparency and accountability. We are committed to continuously enhancing traceability across our value chain and ensuring that sustainable practices are embedded in our procurement activities.

3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for**

   (a) Plastics (including packaging)

   (b) E-waste

   (c) Hazardous waste and

   (d) other waste.

   The Company has adopted a structured device refurbishment initiative, through a third-party, for its Soundboxes and EDC machines. Devices returned by merchants are sent to dedicated refurbishment centers, where they are inspected and refurbished for redeployment. This extends product life and helps in reducing E-Waste disposal.

   Additionally, devices and components that cannot be refurbished, are handed over to authorized recyclers in compliance with the E-Waste (Management) Rules and Hazardous Waste (Management) Rules.

4. **Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.**

Yes, the Extended Producer Responsibility (EPR) obligations under the E Waste (Management) Rules, 2022 and the Battery Waste Management Rules, 2022 and Plastic Waste Management (Amendment) Rules, 2026 are applicable to the Company. The Company's waste collection and disposal framework has been formulated and implemented in alignment with the EPR Plan duly submitted to and registered with the Central Pollution Control Board (CPCB), thereby ensuring full compliance with the prescribed regulatory requirements for responsible management of E-waste and battery waste generated in the course of its operations.

Leadership Indicators

1. **Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment was conducted	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes/ No) If yes, provide the web-link.
NIL	NIL	NIL	NIL	NIL	NIL

2. **If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.**

Name of Product / Service	Description of the risk/ concern	Action Taken
NIL	NIL	NIL

3. **Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).**

Indicate input material	Recycled or re-used input material to total material	
	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
NIL	NA	NA

4. **Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:**

Particulars	FY 2025 - 26 Current Financial Year			FY 2024 - 25 Previous Financial Year		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (Including packaging)	NA	NA	NA	NA	NA	13.045 MT[2]
E-waste	911.18 MT[1]	381.97 MT	NA	1,157.73 MT	221.11 MT	NA
Hazardous waste	NA	NA	NA	NA	NA	NA
Other waste	NA	NA	NA	NA	NA	NA

[1]**Note:** In addition to the total E-waste reused, 292.17 MT of returned devices were revamped and redeployed to merchants in FY 2025-26,as they had not yet reached the end of their operational lifespan.

[2]**Note:** This refers to plastic waste from the body of soundboxes and EDCs at certain sites, which was safely disposed through authorized vendors.

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

Indicate product category	Reclaimed products and their packaging materials as % of total products sold in respective category
NA	NA

Note: We are into technology enabled financial services business in which we lease Soundboxes and other devices like EDCs to our merchants. If the devices are not working or the merchant has discontinued the service, then the devices are returned back to the warehouse. In both cases, we check all returned devices and refurbish those which can be reused. Devices that cannot be refurbished are sent to authorised recyclers for processing.

PRINCIPLE 3

Businesses should respect and promote the well-being of all employees, including those in their value chains

Essential Indicators

1. a. Details of measures for the well-being of employees:

Category	% of employees covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities[1]	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	9,545	9,545	100.00%	9,545	100.00%	NIL	NIL	9,545	100.00%	NA	NA
Female	1,042	1,042	100.00%	1,042	100.00%	1,042	100.00%	NIL	NIL	1,042	100.00%
Total	**10,587**	**10.587**	**100.00%**	**10,587**	**100.00%**	**1,042**	**9.84%**	**9,545**	**90.16%**	**1,042**	**9.84%**
Other than permanent employees											
Male	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Female	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Total	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

[1]**Note:** The Child day-care facility extends an enhanced employee benefit to support our eligible employees with small children so that each of us can work towards our career aspirations without compromising on childcare. Further, childcare benefit policy reflects our commitment towards enabling workforce diversity. This is in compliance with the Maternity Benefit Act,1961 as well as the relevant guidelines laid out by the Government. This policy also extends to single parents of either gender, parents from a same gender couple, parents of either gender with a child clinically diagnosed with special needs (Physical or Mental disability). The children clinically diagnosed with special needs (Physical or Mental disability) are entitled to be admitted into a day-care centre that provides care for children with special needs. The Company doesn't have a Day-care facility on all its premises. We have tie-ups with nationally renowned third-party day care providers/ aggregators. The list of available centres has been communicated to employees and the payment is provided directly to the vendors.

b. Details of measures for the well-being of workers:

Category	% of workers covered by										
	Total (A)	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent workers											
Male	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Other than Permanent workers											
Male	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

c. **Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format –**

Particulars	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Cost incurred on well-being measures as a % of total revenue of the company	0.29%[1]	0.43%

[1]**Note:** The above accounts for cost incurred on insurances, day care facilities, maternity benefits and paternity benefits. Additionally, we have also invested in multiple employee engagement activities under the well-being initiatives such as Team and Business outings to focus on team engagements, Rewards & Recognition programs and celebration activities having a cumulative cost of ₹ 9.0 Crores in FY 2025-26 which is over and above the percentages reported above.

2. Details of retirement benefits, for Current Financial Year and Previous Financial Year.

Benefits	FY 2025 - 26 Current Financial Year			FY 2024 - 25 Previous Financial Year		
	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)	No. of employees covered as a % of total employees	No. of workers covered as a % of total workers	Deducted and deposited with the authority (Y/N/N.A.)
PF	99.87%[1]	NIL	Yes	99.88%[3]	NIL	Yes
Gratuity	100.00%	NIL	NA	100.00%	NIL	NA
ESI	1.79% [2]	NIL	Yes	15.60%[4]	NIL	Yes
Others – Please Specify	NA	NA	NA	NA	NA	NA

Note:

For FY 2025-26:

[1]14 out of 10,587 Employees have voluntarily opted out from PF

[2]All 190 employees eligible for cover under ESIC were covered

For FY 2024-25:

[3]18 out of 14,656 Employees have voluntarily opted out from PF

[4]All 2,286 employees eligible for cover under ESIC were covered

3. Accessibility of workplaces

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard

Yes, the Company has implemented infrastructural provisions to ensure a supportive and barrier-free environment, which include wheelchair accessibility across the corporate office and major sales offices. Additionally, these facilities are equipped with ramps and dedicated specially-designed washrooms to ensure seamless accessibility and comfort for differently-abled employees in Skymark office.

4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web link to the policy.

Yes, Paytm has established and implemented an Equal Employment Opportunity Policy for Persons with Disabilities in line with the Rights of Persons with Disabilities Act, 2016.

The Company is committed to fostering an inclusive workplace through:

- Merit-based, non-discriminatory practices across hiring, development, and benefits
- Accessible physical and digital infrastructure aligned with prescribed standards
- Inclusive recruitment processes with necessary flexibility for candidates with disabilities
- Dedicated governance, including a Liaison Officer to drive compliance and inclusion

- Robust record-keeping and a multi-level grievance redressal mechanism
- Ongoing awareness and training, supported by clear policy communication

These measures reinforce Paytm's commitment to equity, accessibility, and respect for persons with disabilities.

Link: https://paytm.com/document/ir/policies-and-guidelines/Equal-opportunities-for-Employees.pdf

5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent employees		Permanent workers	
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	97.18%	66.31%	NA	NA
Female	94.29%	55.77%	NA	NA
Total	96.77%	64.02%	NA	NA

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and workers? If yes, give details of the mechanism in brief.

Particulars	Yes/No (If Yes, then give details of the mechanism in brief)
Permanent Workers	NA
Other than Permanent Workers	NA
Permanent Employees	Yes[1]
Other than Permanent Employees	NA

[1]**Note:** The Company operates a robust employee grievance redressal mechanism managed through the Consequence Management Policy, ensuring a readily accessible platform for prompt grievance resolution. Any grievances raised are addressed promptly without tolerance for any form of retaliation against employees. Reporting channels are clearly defined, allowing employees to voice concerns regarding work, culture, or team-related issues to their reporting manager, skip manager, HR Business Partner, HOD, or CHRO, following defined stages outlined in the policy. Furthermore, specific helpdesk IDs are provided for queries related to PF, payroll, etc.

Our Anti-Bribery and Whistle-Blower mechanism offers a formal platform to report grievances on various matters. The Compliance Officer ensures annual mandatory training for internal stakeholders to enhance policy compliance. Employees are briefed on the grievance mechanism through a dedicated module, enabling them to report concerns related to bribery or corruption using our vigil mechanism, facilitated by Navex Global to ensure confidentiality of complainants' identities.

Paytm maintains a POSH Policy and an Internal Complaints Committee (IC) in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013. Our policy is available on the Company's website, and the ICC, predominantly composed of women Members, is responsible for investigating complaints. Regular sensitization sessions on preventing sexual harassment are conducted through workshops, group meetings, online modules, and awareness programs.

Whistle Blower Mechanism (for OCL):

https://paytm.com/document/ir/policies-and-guidelines/Whistle_Blower_Vigil_mechanism_policy.pdf

Whistle Blower Mechanism (for PPSL):

https://www.paytmpayments.com/policies?tab=wb

POSH Policy (for OCL):

https://paytm.com/document/ir/policies-and-guidelines/POSH_Policy_V2.0_2026

POSH Policy (for PPSL):

https://www.paytmpayments.com/policies?tab=posh

7. Membership of employees and workers in association(s) or Unions recognized by the listed entity:

Category	FY 2025 – 26 Current Financial Year			FY 2024 – 25 Previous Financial Year		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)
Total Permanent Employees						
Male	9,545	NIL	NIL	13,619	NIL	NIL
Female	1,042	NIL	NIL	1,037	NIL	NIL
Total Permanent Workers						
Male	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA

8. Details of training given to employees and workers:

Category	FY 2025 - 26 Current Financial Year					FY 2024 - 25 Previous Financial Year				
	Total (A)	On Health and safety measures[1]		On Skill upgradation[2]		Total (D)	On Health and safety measures		On Skill upgradation	
		No.(B)	% (B / A)	No.(C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
Employees										
Male	9,545	469	4.91%	7,725	80.93%	13,619	498	3.66%	9,580	70.34%
Female	1042	114	10.94%	887	85.12%	1,037	85	8.20%	652	62.87%
Total	**10,587**	**583**	**5.51%**	**8,612**	**81.35%**	**14,656**	**583**	**3.98%**	**10,232**	**69.81%**
Workers										
Male	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Total	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

[1]**Note:** Health and safety training are rolled out to all the employees. The percentage mentioned above regarding health and safety measures reflects the actual participation rate in these trainings.

[2]**Note:** The headcount (HC) data pertains to all individuals (active & in-active) who were upskilled throughout the year i.e. until March 31, 2026.

9. Details of performance and career development reviews of employees and workers.

Category	FY 2025 - 26 Current Financial Year			FY 2024 - 25 Previous Financial Year		
	Total (A)	No. (B)	% (B / A)	Total (C)	No.(D)	% (D / C)
Employees						
Male	9,545	9,545	100.00%	13,619	13,619	100.00%
Female	1,042	1,042	100.00%	1,037	1,037	100.00%
Total[1]	**10,587**	**10,587**	**100.00%**	**14,656**	**14,656**	**100.00%**
Workers						
Male	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA
Total	NA	NA	NA	NA	NA	NA

[1]**Note:** 100% of employees have received performance and career development reviews. Frontline sales staff undergo real-time performance reviews on a monthly basis as part of their career progression plan. This approach allows for continuous feedback and advancement opportunities throughout the year.

10. Health and safety management system:

a) Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?

Yes, the Company has implemented a formal Occupational Health and Safety Management System, although the occupational health and safety risks associated with its business operations are minimal.

Paytm has instituted a comprehensive set of health and safety measures to ensure the safety, well being, and welfare of its employees. The measures include the following:

- Paytm has implemented robust physical and electronic security arrangements at all its offices, including manned guarding services and Electronic access control systems at Corporate office.
- All offices are covered under Closed Circuit Television (CCTV) surveillance, smoke detection and fire fighting systems.
- Paytm conducts periodic emergency and disaster management drills, including fire & safety drills. These emergency evacuation drills are conducted bi-annually at the Skymark office and annually at sales offices.
- Paytm's Corporate & Sales offices are equipped with centralized Heating, Ventilation, and Air Conditioning (HVAC) systems fitted with air filters, along with adequate provisions for the circulation of fresh air across all premises.
- A centralized helpline has been established to enable employees to promptly report any work related hazards or concerns to the Administration department.
- Paytm ensures the availability of safe drinking water, well maintained and hygienic premises, across all its offices.
- The Administration team undertakes periodic inspection, maintenance, and certification of critical electromechanical equipment, including, HVAC systems, fire & safety systems, and Uninterruptible Power Supply (UPS) units.
- Dedicated wellness rooms have been set up at the Company's offices in Skymark, Noida and Bangalore to attend to employees experiencing medical concerns.
- Health camps for employees are organized at regular intervals by the Human Resources team.
- Awareness sessions on nutrition, health, and overall well being are periodically conducted for the benefit of employees.
- Cardiopulmonary Resuscitation (CPR) training is imparted to the members of Skymark office of the Company's Emergency Response Team (ERT).

Through the aforementioned measures, Paytm reaffirms its commitment to providing a safe, secure, and conducive working environment for all its employees.

b) What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

The Company has instituted a structured framework for the identification and assessment of work related hazards, encompassing both routine and non routine activities, with a view to effectively mitigating associated risks. The key measures undertaken include the following:

- Comprehensive security checks are carried out at the Company's premises, encompassing physical security arrangements such as manned guarding services, Access Control Systems, Closed Circuit Television (CCTV) surveillance, and the upkeep of fire fighting systems.
- A well established Disaster Management Plan has been put in place, pursuant to which Paytm conducts annual emergency mock drills to ensure preparedness across its offices.
- The Heating, Ventilation, and Air Conditioning (HVAC) systems installed across Paytm's Corporate & Sales offices are subjected to regular inspection to ensure their optimal functioning.
- The structural and operational safety of the Paytm's premises is ensured through the periodic maintenance of electromechanical systems, including, Uninterruptible Power Supply (UPS) units.
- Adequate emphasis is placed on maintaining office hygiene and cleanliness, thereby fostering a safe and conducive working environment.

- Security personnel deployed across all offices are duly trained in the operation of fire safety equipment and emergency response protocols.
- Periodic safety advisories are circulated to employees, addressing various aspects including, traffic advisory, fire safety, and general security precautions.

Through the aforementioned measures, Paytm reaffirms its commitment to ensuring a safe and secure working environment for its employees and stakeholders, while proactively mitigating work-related hazards and risks.

c) Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)

Yes, the Company has instituted a robust and well structured process to enable employees to report work related hazards and to remove themselves from situations involving such risks. A centralized Helpline Number and a dedicated email channel have been put in place, through which employees may report any hazard or risk encountered in the course of their work. The said Helpline Number is prominently displayed across all offices of the Company to ensure ease of access and visibility.

In addition, Emergency Response Teams (ERT) have been constituted and stationed at the Corporate Office and major Sales Offices to provide immediate assistance and support in the event of any emergency or hazardous situation.

d) Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)

Yes, the Company extends comprehensive health insurance coverage to its employees, thereby ensuring access to medical services in accordance with the terms of the policy. In addition, periodic health check up camps are organized at Paytm's offices across India, enabling employees to avail preventive healthcare services with ease and convenience.

The Company further conducts regular webinars and awareness sessions, featuring eminent medical practitioners from reputed hospitals, with a view to fostering greater health consciousness and well being among its employees.

11. Details of safety related incidents, in the following format:

Safety Incident/Number	Category	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked	Employees	NIL	NIL
	Workers	NA	NA
Total recordable work-related injuries	Employees	NIL	NIL
	Workers	NA	NA
No. of fatalities	Employees	NIL	NIL
	Workers	NA	NA
High consequence work-related injury or ill health (excluding fatalities)	Employees	NIL	NIL
	Workers	NA	NA

12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

The Company has implemented a comprehensive set of measures to ensure a safe, secure, and healthy workplace environment for its employees. The measures are as follows:

- Paytm has implemented robust physical and electronic security arrangements at all its offices, including manned guarding services, and Electronic Access Control Systems at Corporate office.
- Alarms, equipped with fire and smoke sensors, have been installed to facilitate early detection of fire and security threats.
- Fire extinguishers are made available across all offices to enable immediate response to fire incidents, and the said equipment is subject to regular maintenance and servicing.
- Comprehensive training and awareness programmes on best practices and fire fighting are imparted to security personnel and employees. The Company also conducts periodic mock drills, fire drills, and physical verification of fire safety equipment, in addition to maintaining well documented evacuation plans for Corporate and Sales offices.

- Automatic fire suppression systems have been installed in data and server rooms at select offices to safeguard critical infrastructure.
- Important contact numbers, fire brigade, police station, and ambulance services, are prominently displayed across the Company's office premises.
- Public address systems have been installed at Corporate office premises to facilitate effective communication during emergencies.
- Emergency evacuation plans, floor layouts, and designated exit pathways are clearly displayed on each floor of the corporate offices. .
- CCTV cameras have been deployed for the surveillance and recording of all activities, including the detection of any acts of sabotage or untoward incidents.
- First Aid Boxes are made available across all offices, and regular first aid training is imparted to employees and security personnel.
- Employees' dependents are covered under the Company's Mediclaim policy, thereby extending medical coverage to their immediate family members.
- Complimentary shuttle services are provided to employees of the Skymark office Noida, to facilitate commute between the nearest metro station and the office, thereby promoting convenience and mitigating transportation related risks.
- Paytm ensures the cleanliness and hygiene of the dining areas to maintain a healthy and conducive environment for its employees.
- Dedicated wellness rooms have been established at the Skymark, Noida and Bangalore offices to attend to employees experiencing medical concerns.
- Sanitary Product Disposal Machines have been installed at the Corporate Office and major Sales Offices.

13. Number of Complaints on the following made by employees and workers:

	FY 2025 - 26 Current Financial Year			FY 2024 - 25 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	NIL	NIL	NA	NIL	NIL	NA
Health & Safety	NIL	NIL	NA	NIL	NIL	NA

14. Assessments for the year:

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Health and safety practices Working Conditions	The Company strives to maintain a safe and hygienic workplace to ensure the health and wellbeing of its employees. 100% of the offices were assessed on health and safety practices and workplace conditions during FY 2025-26.

15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

Paytm remains firmly committed to providing a safe, secure, and healthy working environment for its employees. In line with this commitment, comprehensive Environment, Health, and Safety (EHS) assessments were undertaken at the Company's Corporate offices, Sales Offices, and Fleet Hubs.

Leadership Indicators

1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N).

Yes, the Company extends comprehensive support to the families of deceased employees as part of its employee welfare framework. All permanent employees are covered under the Group Term Life (GTL) Insurance Policy, which provides financial security to the family of the employee in the unfortunate event of their demise. In addition, assistance for the settlement of Provident Fund (PF) and Gratuity dues is extended to the family of the deceased employee on a priority basis, ensuring timely disbursement of statutory benefits.

Furthermore, in accordance with the Company's Employee Stock Option Plan (ESOP), any unvested ESOPs held by an active employee shall stand immediately vested upon the demise of such employee, thereby ensuring that the rightful benefits accrue to the family of the deceased.

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

The Company has instituted adequate mechanisms to ensure that all requisite statutory dues, as applicable to its transactions with value chain partners, are duly deducted and deposited in accordance with the prescribed regulations. Additionally, Paytm obtains the necessary certificates and supporting documentation from its contractors evidencing the timely payment of statutory dues, including contributions towards Provident Fund (PF), Employees' State Insurance Corporation (ESIC), and other applicable levies in respect of contractual employees and workers.

The Company further expects its value chain partners to adhere to ethical business practices in all their dealings and to uphold the highest standards of fair conduct, integrity, and regulatory compliance. Accordingly, suitable provisions have been duly incorporated in the Company's contractual arrangements with its value chain partners to give effect to these expectations.

3. Provide the number of employees / workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

Particulars	Total no. of affected employees/ workers		No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment	
	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Employees	NIL	NIL	NIL	NIL
Workers	NA	NA	NA	NA

4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

No, the Company does not currently offer a formal, standalone transition assistance programme. However, the Company duly acknowledges the wealth of experience, institutional knowledge, and expertise that retiring employees bring to the organization.

In addition, eligible employees are entitled to receive gratuity upon superannuation, in accordance with the provisions of the Payment of Gratuity Act, 1972, and other applicable statutory benefits prescribed under law.

5. Details on assessment of value chain partners

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	ESG Assessment for value chain partners were conducted for the suppliers/vendors comprising 2% or more of the OCL's & PPSL's purchases (by value) in each case.
Working Conditions	

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

There were no significant adverse impacts or concerns with respect to Health & Safety practices and workplace conditions of value chain partners.

PRINCIPLE 4

Businesses should respect the interests of and be responsive to all its stakeholders

Essential Indicators

1. **Describe the processes for identifying key stakeholder groups of the entity.**

   The Company places significant emphasis on transparent communication and active collaboration with its stakeholders, recognizing that meaningful engagement is fundamental to long-term value creation. To institutionalize this approach, OCL has formulated a comprehensive Stakeholder Engagement Policy, which establishes the purpose, scope, identification criteria, engagement mechanisms, and communication protocols designed to enhance transparency, responsiveness, and accountability across all interactions.

   The Policy serves the following core objectives:

   - To establish consistent standards and protocols for engaging with stakeholders across OCL's operational boundaries and material subsidiaries;
   - To identify risks and opportunities arising from stakeholders' material concerns;
   - To cultivate a sound understanding of stakeholder requirements, interests, and expectations; and
   - To build relationships of trust that reflect OCL's commitment to its valued stakeholders.

   The process of stakeholder identification, prioritization, and engagement is closely aligned with the Policy. Stakeholders are identified on the basis of the following criteria:

   - **Direct or indirect association with business activities:** Individuals or groups directly or indirectly linked to the Company's products, services, and operations, including employees, customers, merchants, and vendors/suppliers.
   - **Responsibility-based stakeholders:** Stakeholders toward whom the Company holds legal, regulatory, commercial, operational, or ethical responsibilities, including government bodies and regulatory authorities.
   - **Influence on decision-making:** Stakeholders with the capacity to influence or impact the Company's strategic or operational decisions, including the Board of Directors, investors, and shareholders.
   - **Contribution to brand and ecosystem value:** Stakeholders who contribute to building and sustaining Paytm's brand and broader ecosystem, including media, partners, and other ecosystem participants.

   The stakeholder identification process is reviewed periodically, to ensure continued alignment with evolving stakeholder expectations, business priorities, and regulatory requirements. Through this structured and dynamic approach, Paytm ensures that its stakeholder engagement remains meaningful, inclusive, and aligned with the objective of sustainable and long-term value creation.

2. **List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.**

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Employees	No	• Learning Management System & Emails	Monthly / As required	• Awareness of critical topics is conducted to mitigate risk & build awareness • Support with avenues for self-development at work to excel in their roles • Training program
		• Emails	Monthly / As required	• Organizational policy and process updates
		• Newsletter	Monthly / As required	• Employee recognition and business and other updates
		• Meeting with Line Managers	Half yearly / As required	• Employee performance review and career development
		• Video conferencing or Physical meeting	Quarterly / As required	• Town Hall
Customers	No	• Customer Help Desk through Paytm App with a bot channel	As per requests raised by customers	• To address customer concerns • Support customers on queries and requests related to various offered products
Merchants	No	• Merchant Help Desk through Paytm for Business app with Bot and Interactive Voice Response (IVR) channel	As required	• Resolving queries; • Support on queries related to Soundboxes and POS devices
Vendors / Suppliers	No	• Emails	As required	• Resolve queries and operational challenges
Partners	No	• Press releases and stock exchange filings • Quarterly earnings calls • Annual shareholder meetings • Investor conferences and meetings	Monthly	• Providing business and financial performance updates to stakeholders. • Updates on Material events/ information • Resolving queries and assessing performance
NGO Partners & Communities	Yes	• Project Update Meetings / Field Visits	As required	• Projects Implementation according to community needs

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/ No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Shareholders / Investors	No	• Press releases and stock exchange filings; • Quarterly earnings calls; • Annual shareholder meetings; • Investor conferences and meetings	Quarterly or as and when applicable, whichever is earlier	• Providing business and financial performance updates to stakeholders. • Updates on Material events/ information • Resolving queries and operational challenges; • Providing relevant information and helping stakeholders understand the Company's performance and strategy; • Updating on recent market developments
Government Bodies	No	• Industry bodies/ Committees • Face-to-face meetings; Presentations	Ongoing Basis	• Engagement and collaboration on industry wide issues • Meetings and discussions with relevant Ministries, Departments, and Committees constituted by the Government on existing and proposed regulations/orders/ directives and advisories under various acts, as and when required
Media	No	• Emails / Telephone / Face-to-face meetings	Monthly	• Sustained brand communication through press releases, social posts, and Stock Exchange filings; • Announcements including partnerships, product launches, business updates; • Engaging with industry stories and resolving queries with spokesperson statements
Board and Committee Members	No	• Board meetings • Committee meetings • Emails	Quarterly or as and when applicable, whichever is earlier	• Business updates • Updates on material events/ information • Regulatory/Statutory approvals • Training

Leadership Indicators

1. **Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.**

   OCL adopts a strategic and structured approach to the identification, prioritization, and engagement of its stakeholders, in alignment with its comprehensive Stakeholder Engagement Policy. The Policy fosters transparency and accountability by clearly delineating the objectives, scope, engagement mechanisms, and communication channels that govern effective stakeholder interactions. Paytm maintains continuous engagement with its stakeholders through regular interactions across multiple touchpoints.

   The ESG Committee, functioning under the overall guidance of the Corporate Social Responsibility (CSR) Committee, plays a pivotal role in strengthening OCL's ESG governance framework. The Committee is entrusted with the following responsibilities:

   - Providing strategic direction and oversight in respect of OCL's ESG agenda;
   - Reviewing, approving, and guiding ESG initiatives and policies; and
   - Monitoring ESG performance and ensuring the effective implementation of related initiatives.

   The ESG Committee periodically apprises the CSR Committee and the Board of Directors of the progress made on ESG initiatives, key developments, and emerging priorities. This structured governance mechanism facilitates robust oversight and ensures that ESG considerations are meaningfully embedded within the Company's business strategy and operations.

2. **Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes/No). If so, provide details of instances as to how the input received from stakeholders on these topics were incorporated into policies and activities of the entity.**

   OCL undertakes a materiality assessment on a periodic basis with a view to identifying and prioritizing key environmental and social topics that are of strategic relevance to its business and stakeholders.

   As part of this exercise, the Company actively engages with both internal and external stakeholders to seek their feedback, perspectives, and concerns. The insights gathered through these consultations are duly considered and incorporated in the prioritization of the Company's material ESG issues.

   The material issues identified serve as the foundation for shaping OCL's overall ESG Strategy. Accordingly, OCL adopts appropriate initiatives aimed at effectively addressing the material issues, thereby reinforcing its commitment to responsible and sustainable business conduct.

   Following are key initiatives undertaken based on engagement with internal and external stakeholders:

   - ESG Strategy has been established by OCL with action plans for short, medium and long term.
   - Organization wide training and awareness on ESG aspects for employees, as well as ESG training for the Board of Directors.
   - ESG training and awareness sessions for critical vendors along with vendor assessment on ESG parameters.
   - Paytm is in the process of establishing an Environment and Occupational Health & Safety Management System for its corporate office in alignment with ISO 14001 and ISO 45001 Standard.
   - Beyond business as usual, the Company is also involved in giving back to the community by conducting various employee volunteering activities and implementing various CSR activities.

3. **Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.**

   The Company remains firmly committed to engaging with and addressing the needs of vulnerable and marginalized communities through structured Corporate Social Responsibility (CSR) initiatives and strategic partnerships with not-for-profit organizations across India. Paytm’s approach is anchored in effective project execution, transparent utilization of funds, and continuous monitoring to ensure meaningful and measurable impact. Guided by the Board-approved Corporate Social Responsibility (CSR) Policy, Paytm continues to extend support to underserved communities across the country through a range of focused initiatives, as outlined below:

Key Initiatives Undertaken:

- **Education Support:** Distributed school books, winter uniforms, footwear, and stationery to 200 underprivileged children in Delhi, thereby reducing barriers to education and enabling continued learning.
- **Infrastructure Development:** Enhanced learning environments at Shankara Vidya Kendra NGO, Delhi, through the construction of sanitation facilities and training spaces, thereby ensuring safety, hygiene, and improved access to education.
- **Support for Persons with Disabilities:** In collaboration with Anchal Charitable Trust, facilitated the screening and distribution of 80 assistive aids and appliances to Persons with Disabilities (PWDs), enabling enhanced mobility and independence.
- **Digital Education and Capacity Building:** Partnered with Bapuji Rural Enlightenment and Development Society (BREDS) to establish computer laboratories in two Government schools in Vizianagaram, Andhra Pradesh, with a view to advancing digital literacy among students.
- **Higher Education Support:** Partnered with the Shiksha Seva Foundation to extend scholarships to 24 engineering students at the Scaler School of Technology, Bengaluru.
- **Wisdom on Wheels Initiative:** Donated a mobile digital bus equipped with laptops and learning tools to Veer Surendra Sai University of Technology (VSSUT) University, Sambalpur, in furtherance of digital literacy and financial awareness.
- **Access to Safe Drinking Water:** Donated water coolers fitted with RO facilities to the Government Institute of Medical Sciences (GIMS), Greater Noida, contributing to improved health and hygiene standards.

In addition, employee volunteering initiatives have played a pivotal role in community engagement during the year, with over 2,040 volunteering hours contributed and 1,912 beneficiaries positively impacted, including children, women, and the elderly. These efforts encompassed clean-up drives, food distribution, and various community engagement activities.

Collectively, these initiatives reflect Paytm's enduring commitment to inclusive development and to creating a positive and lasting impact on marginalized communities across the country.

PRINCIPLE 5

Businesses should respect and promote human rights

Essential Indicators

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

Category	FY 2025 – 26 Current Financial Year			FY 2024 - 25 Previous Financial Year		
	Total (A)	No. of employees/ workers covered (B)	% (B / A)	Total (C)	No. of employees/ workers covered (D)	% (D / C)
Employees						
Permanent[1]	10,587	10,181	96.17%	14,656	14,656	100.00%
Other than permanent	NA	NA	NA	NA	NA	NA
Total Employees	**10,587**	**10,181**	**96.17%**	**14,656**	**14,656**	**100.00%**
Workers						
Permanent	NA	NA	NA	NA	NA	NA
Other than permanent	NA	NA	NA	NA	NA	NA
Total Workers	NA	NA	NA	NA	NA	NA

[1]**Note:** Topics related to human rights are covered under the Company's Code of Conduct (CoC). It forms as part of mandatory compliance training. The completion status is based on employee records as of March 31, 2026.

2. Details of minimum wages paid to employees and workers, in the following format:

Category	FY 2025 – 26 Current Financial Year					FY 2024 - 25 Previous Financial Year				
	Total (A)	Equal to Minimum Wage		More than Minimum Wage		Total (D)	Equal to Minimum Wage		More than Minimum Wage	
		No.(B)	% (B /A)	No. (C)	% (C/ A)		No. (E)	% (E/ D)	No. (F)	% (F / D)
Employees										
Permanent	10,587	NIL	NIL	10,587	100.00%	14,656	NIL	NIL	14,656	100.00%
Male	9,545	NIL	NIL	9,545	100.00%	13,619	NIL	NIL	13,619	100.00%
Female	1,042	NIL	NIL	1,042	100.00%	1,037	NIL	NIL	1,037	100.00%
Other than Permanent	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Male	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Female	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Workers										
Permanent	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Male	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Other than Permanent	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Male	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Female	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

3. Details of remuneration/salary/wages

a. Median remuneration / wages:

OCL

Category	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category[1]	Number	Median remuneration/ salary/ wages of respective category[1]
Board of Directors (BoD)	5	0.37	2	0.71
Key Managerial Personnel	3	4	1	2.4
Employees other than BoD and KMP[2]	3,026	0.12	521	0.14
Workers	NA			

PPSL

Category	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category[1]	Number	Median remuneration/ salary/ wages of respective category[1]
Board of Directors (BoD)[3]	5	0.43	1	0.00
Key Managerial Personnel[4]	3	0.85	1	0.02
Employees other than BoD and KMP[2]	6,514	0.08	520	0.07
Workers	NA	NA	NA	NA

Note:

[1]Figures are in Rs. Crores

[2]This is as per the CTC of employees who were active as on March 31, 2026.

[3]Mr. Vijay Shekhar Sharma is a member of Board for both OCL and PPSL, while Mr. Madhur Deora and Ms. Rakhi Singh serves as a Director for PPSL. Despite their concurrent board roles, remuneration for all three individuals is disbursed entirely by OCL.

[4]The median remuneration for Key Managerial Personnel of the PPSL entity has been calculated based on the date of joining of the individuals.

b. Gross wages paid to females as a % of total wages paid by the entity, in the following format:

Particulars	FY 2025 – 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Gross wages paid to females as % of total wages[1]	10.92%	10.54%

[1]**Note:** The disclosure has been done on the basis of the salaries (CTC) paid to females. The Company has no workers and hence have no wages paid.

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes, the Company has instituted multiple focal points and committees that collectively serve to address human rights related issues arising out of its operations. These include the Internal Complaints Committee (IC) constituted under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, for matters pertaining to sexual harassment. The company has a structured Grievance Escalation Matrix for the redressal of general workplace related concerns. Additionally, a disciplinary committee prevails to examine the cases of internal misconduct, including violations of the Code of Conduct. Further, an independent Risk & Vigilance team oversees and addresses concerns relating to ethical conduct, compliance, and integrity within the organization.

5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

The Company has instituted robust internal mechanisms for the redressal of grievances pertaining to human rights, spanning the domains of employee experience, ethics, workplace safety, and legal compliance. The mechanisms are as follows:

- **Employee Grievance Redressal Policy:**

  The Company has implemented a structured three tier grievance redressal framework, which enables employees to raise their concerns at multiple levels. In the first level, the grievance is to be brought to the attention of the reporting manager, followed by two successive levels of escalation, supported by a dedicated escalation helpline. In the event that the grievance pertains to the reporting manager, the concerned employee may directly approach the second level of escalation.

- **Whistleblower and Vigil Mechanism:**

  The Company has put in place a comprehensive Whistleblower and Vigil Mechanism, which provides a dedicated helpline number, a web portal, and a mobile application for the reporting of unethical conduct or any other matter of concern. In addition, protected disclosures may be submitted to the General Counsel either by postal mail or by electronic mail. Where the disclosure pertains to the General Counsel, the same may be addressed to the Chairperson of the Audit Committee. Where the disclosure pertains to the Chairperson of the Audit Committee, it may be addressed to the Board of Directors.

- **POSH Policy and Internal Committee (IC):**

  In line with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, an aggrieved woman may submit a complaint of sexual harassment at the workplace to the Internal Committee (IC). Upon receipt of such complaint, an enquiry is conducted in accordance with the prescribed procedure, and the IC submits its report containing the findings and recommendations to both the Complainant and the Respondent. Upon the parties' acknowledgement of the findings, the report is forwarded to the Human Resources department, which initiates appropriate action within the prescribed timelines. A formal appellate process is also available to the parties.

- **Risk and Vigilance Team:**

  The Company has constituted an independent Risk and Vigilance team, to whom employees may raise concerns relating to ethical conduct and integrity. Such concerns are duly investigated and acted upon by the Disciplinary Committee, in accordance with the Company's Consequence Management Policy.

- **Disciplinary Committee:**

  The Company prevails a Disciplinary Committee to oversee cases of internal misconduct, including violations of the Code of Conduct. The committee reviews reported escalations with strict objectivity and confidentiality, ensuring that all concerned individuals are provided a fair opportunity to justify their position. Investigations and subsequent consequence management actions are managed systematically under a defined Standard Operating Procedure (SOP) to uphold organizational accountability.

The aforementioned mechanisms are underpinned by the foundational principles of confidentiality, non retaliation, and timely redressal, thereby reinforcing the Company's unwavering commitment to ethical conduct and human rights compliant practices across its operations.

6. Number of Complaints on the following made by employees and workers:

Particulars	FY 2025 – 26 Current Financial Year			FY 2024 - 25 Previous Financial Year		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Sexual Harassment	6 (OCL: 6, PPSL: 0)	0	NIL	2	0	NIL
Discrimination at workplace	165 (OCL:160, PPSL: 5)	2	All complaints have been resolved on the date of the report.	148	3	All complaints have been resolved on the date of the report.
Child Labour	NIL	NIL	NIL	NIL	NIL	NIL
Forced Labour / Involuntary Labour	Nil	NIL	NIL	NIL	NIL	NIL
Wages	167 (OCL:160, PPSL:7)	3	All Complaints are closed as on date of the report.	55	2	All complaints are resolved as of date of the report
Other human rights related issues	9 (OCL: 9, PPSL: 0)	0	NIL	0	0	NIL

7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:

Particulars	FY 2025 – 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) [1]	6	2
Complaints on POSH as a % of female employees / workers	0.66%	0.15%
Complaints on POSH upheld[1]	6	0

[1]**Note:** The POSH complaints reported in the above table belong to OCL.There were no POSH complaints under PPSL during FY 2025-26.

8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

The Company's Human Resource policies and Code of Conduct are designed to foster diversity and equality in the workplace and ensure adherence to all applicable local labor laws.

Zero Tolerance for Harassment and Discrimination

Paytm maintains zero tolerance toward harassment and discrimination. Under its Code of Conduct, Paytm and its affiliates provide equal opportunities to all employees and applicants, regardless of race, caste, religion, colour, ancestry, marital status, work experience, gender, sexual orientation, age, nationality, ethnic origin, or disability. Stakeholders raising complaints in good faith are protected from retaliation, irrespective of the outcome.

The Prevention of Sexual Harassment (POSH) Policy, framed under the POSH Act, 2013, prohibits workplace sexual harassment and provides a structured redressal procedure. Where allegations are substantiated by the Internal Complaints Committee (IC), disciplinary measures such as transfer, withholding of promotion, suspension, or termination may be imposed, without prejudice to the complainant's legal remedies.

Whistleblower Mechanism

Paytm's Whistleblower mechanism enables employees and stakeholders to report violations of the Anti-Bribery and Anti-Corruption (ABAC) Policy, including bribery, suspected corruption, behavioral misconduct, and discrimination. Complaints raised internally are promptly routed to this mechanism, with the complainant's identity kept strictly confidential.

To strengthen this framework, Paytm has deployed a web portal that permits anonymous complaints and supports protected disclosures via dedicated web links, a toll-free number, and an application interface, with details available on the Company's intranet. All complaints are investigated promptly and in full compliance with applicable regulations. Upon conclusion, a report with recommended actions is submitted to the Disciplinary Committee, whose approval is required for any disciplinary action, guided by the prevailing Consequence Management Policy.

9. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

Yes, human rights requirements form an integral part of our business agreements and contracts. Paytm ensures that its business agreements with external stakeholders incorporate appropriate clauses requiring adherence to applicable laws and ethical standards.

All third party engagements are subject to appropriate due diligence. Through these measures, Paytm ensures that respect for human rights remains an integral part of its commercial relationships and overall business conduct.

10. Assessments for the year:

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	100.00%
Forced/involuntary labour	100.00%
Sexual harassment	100.00%
Discrimination at workplace	100.00%
Wages	100.00%
Others – please specify	NA

Note: The Company internally monitors compliance with all relevant laws and policies pertaining to these issues at 100% of its offices.

11. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 10 above.

There were no corrective actions undertaken during FY 2025-26 as there were no significant risks/concerns arising from the assessment.

Leadership Indicators

1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.

There have been no significant human rights related concerns or grievances. However, the Company has proactively strengthened its internal protocols to address and mitigate potential human rights risks across its business activities and the value chain.

2. Details of the scope and coverage of any Human rights due-diligence conducted?

The Company conducts periodic surveys to gather structured feedback from its workforce on a range of subjects, including human rights. The survey is administered for key stakeholders including employees through surveys conducted via digital tool to seek feedback on various human rights issues including Diversity and Inclusion, Working Conditions, Ethical Conduct, Learning & Development etc.

The insights gathered through this exercise enable Paytm to promote human rights issues, identify areas for improvement, and reinforce its commitment to fostering a fair, inclusive, and respectful workplace.

Additionally, Paytm ensures that it internally monitors compliance with all relevant laws and policies pertaining to these issues at all its offices.

3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes, the Company has ensured wheelchair accessibility at its corporate office as well as at its major Sales offices, in furtherance of its commitment to fostering an inclusive and accessible workplace for all employees and visitors, including persons with disabilities.

4. Details on assessment of value chain partners:

Particulars	% of value chain partners (by value of business done with such partners) that were assessed
Sexual Harassment	ESG Assessment of value chain partners were conducted for the suppliers/vendors comprising 2% or more of the OCL's & PPSL's purchases (by value) in each case.
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others – please specify	

5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.

There were no significant adverse effects on the parameters listed in the above question

PRINCIPLE 6

Businesses should respect and make efforts to protect and restore the environment[1]

Essential Indicators

1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

Parameter	FY 2025 – 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
From renewable sources (in GJ)		
Total electricity consumption (A)	NA	NA
Total fuel consumption (B)	NA	NA
Energy consumption through other sources (C)	NA	NA
Total energy consumed from renewable sources (A+B+C)	**NA**	**NA**
For non-renewable resources (in GJ)		
Total electricity consumption (D)	9,874.69	8,993.70[2]
Total fuel consumption (E)	185.02[1]	197.68[2]
Energy consumption through other sources (F)	NA	NA
Total energy consumed from non- renewable sources (D+E+F)	**10,059.71**	**9,191.38**
Total energy consumed (A+B+C+D+E+F)	**10,059.71**	**9,191.38**
Energy intensity per rupee of turnover (Total energy consumed / Revenue from operations)	0.00000012 GJ/₹[3]	0.00000017 GJ/₹
Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total energy consumed/Revenue from operations adjusted for PPP)	0.0000024 GJ/$ PPP[4]	0.0000034 GJ/$ PPP
Energy intensity in terms of physical output	NA	NA
Energy intensity (optional) – the relevant metric may be selected by the entity	0.95 GJ/FTE[5]	0.62 GJ/FTE

Notes:

[1]For FY 2025-26, the data for electricity consumption has been reported for 87 office locations occupied by the Company (excluding 2 co-working offices and 1 call center). The data for fuel consumption has been reported for DG sets of 6 locations and Company owned vehicles.

[2]For FY 2024-25, the data for electricity consumption has been reported for 66 offices (including Corporate offices, Sales offices and fleet hubs) operated by the Company (excluding 2 co-working offices). The data for fuel consumption has been reported for DG sets of 6 sites and Company owned vehicles. Figures of FY 2024-25 have been updated on account of change in calculation methodology.

[3]For the purpose of calculating energy intensity per rupee of turnover for FY 2025-26, the turnover includes actual operational revenue of OCL and PPSL.

[4]The PPP factor has been sourced from the IMF database for 2026 to calculate the Energy intensity per rupee of turnover adjusted for PPP.

[5]For the purpose of calculating energy intensity per full time employee, the year end headcount data (as on March 31, 2026) has been considered.

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, we have undertaken Reasonable Assurance on BRSR core KPIs and Limited Assurance on BRSR non-core KPIs (Principle 1-9) with SGS India Private Limited.

2. **Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.**

   Not Applicable.

3. **Provide details of the following disclosures related to water, in the following format.**

Parameter	FY 2025 – 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Water withdrawal by source (in kilolitres)		
(i) Surface water	NA	NA
(ii) Groundwater	29,869.70[1,2]	32,503.81
(iii) Third party water	NA	NA
(iv) Seawater / desalinated water	NA	NA
(vi) Packaged Drinking Water (KL)	23,158.52[2]	2,407.25
Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)	**53,028.21**	**34,911.06**
Total volume of water consumption (in kilolitres)	**53,028.21**	**34,911.06**
Water intensity per rupee of turnover (Total water consumption/ Revenue from operations)	0.00000063 KL/₹[3]	0.00000063 KL/₹
Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total water consumption / Revenue from operations adjusted for PPP)	0.000013 KL/$ PPP[4]	0.000013 KL/$ PPP
Water intensity in terms of physical output	NA	NA
Water intensity (optional) – the relevant metric may be selected by the entity	5.01 KL/FTE[5]	2.38 KL/FTE

Notes:

[1]Groundwater data is available for the Skymark office location. For all other offices, water consumption is calculated by multiplying Paytm's occupancy at each office location by an assumed consumption rate of 45 liters per person per day, as prescribed by the Central Ground Water Authority (CGWA). This figure excludes packaged drinking water, which has been reported separately.

[2]Data on packaged drinking water is for 82 office locations, while the remaining 8 office locations utilize direct RO systems which have been reported under Groundwater withdrawal.

[3]For the purpose of calculating water intensity per rupee of turnover for FY 2025-26, the turnover includes actual operational revenue of OCL and PPSL.

[4]The PPP factor has been sourced from the IMF database for 2026 to calculate the Water intensity per rupee of turnover adjusted for PPP.

[5]For the purpose of calculating water intensity per full time employee, the year end headcount data (as on March 31, 2026) has been considered.

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, we have undertaken Reasonable Assurance on BRSR core KPIs and Limited Assurance on BRSR non-core KPIs (Principle 1-9) with SGS India Private Limited.

4. Provide the following details related to water discharged:

Parameter	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Water discharge by destination and level of treatment (in kilolitres)		
(i) To Surface water		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(ii) To Groundwater		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iii) To Seawater		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iv) Sent to third-parties		
- No treatment	NA	NA
- With treatment – please specify level of treatment	20,641.18[1]	18,228.72[1]
(v) Others	NA	
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
Total water discharged (in kilolitres)	**20,641.18[1]**	**18,228.72[1]**

[1]**Note:** Amount of water discharged through Sewage Treatment Plant (STP) has been reported for two office locations including Bangalore and Skymark, Noida. To calculate the water discharge for Skymark, Noida location, total discharge of water from all corporate towers were considered to derive the STP water discharge per square foot of the area (Sq. ft.). To derive the actual water discharge for Paytm office, the water discharge per square foot is multiplied with the total area occupied by Paytm in the Skymark Building, for Bangalore office actual water discharged through STP has been considered.

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, we have undertaken Reasonable Assurance on BRSR core KPIs and Limited Assurance on BRSR non-core KPIs (Principle 1-9) with SGS India Private Limited.

5. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

Not Applicable

6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

Parameter	Unit	FY 2025 - 26[1] Current Financial Year	FY 2024 - 25 Previous Financial Year
NOx	MT	0.030	0.175
SOx	MT	0.004	0.003
Particulate matter (PM)	MT	0.016	0.035
Persistent organic pollutants (POP)	MT	NIL	NIL
Volatile organic compounds (VOC)	MT	NIL	NIL
Hazardous air pollutants (HAP)	MT	NIL	NIL
Others – please Specify (CO)	MT	0.015	0.015

[1]**Note:** Total emissions (MT) were estimated based on the gas flow rates recorded in the monitoring reports, adjusted for pollutant concentration levels and the total running hours of the DG sets during the reporting year.

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, we have undertaken Reasonable Assurance on BRSR core KPIs and Limited Assurance on BRSR non-core KPIs (Principle 1-9) with SGS India Private Limited.

7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

Parameter	Unit	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Total Scope 1 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)[1]	Metric tonnes of CO_2 equivalent	250.89	173.19
Total Scope 2 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)[2]	Metric tonnes of CO_2 equivalent	1,947.51	1,817.46
Total Scope 1 and Scope 2 emission intensity per rupee of turnover (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)[3]	$MtCO_2e$/ ₹	0.000000026	0.000000036
Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	$MtCO_2e$/$	0.00000053	0.00000075
Total Scope 1 and Scope 2 emission intensity in terms of physical output	$MtCO_2e$/MT	NA	NA
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	$MtCO_2e$/FTE	0.21	0.14

Notes:

[1]Scope 1 emissions have been calculated using the emissions factors published by the DEFRA GHG conversion factors and USEPA.

[2]Scope 2 emissions have been calculated using the emission factors published by the Central Electricity Authority of India.

[3]For the purpose of calculating emission intensity per rupee of turnover for FY 2025-26, the turnover includes actual operational revenue of OCL and PPSL.

[4]The PPP factor has been sourced from the IMF database for 2026 to calculate the total scope 1 and scope 2 emission intensity per rupee of turnover adjusted for PPP.

[5]For the purpose of calculating emission intensity per full time employee, the year end headcount data (as on March 31, 2026) has been considered.

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, we have undertaken Reasonable Assurance on BRSR core KPIs and Limited Assurance on BRSR non-core KPIs (Principle 1-9) with SGS India Private Limited.

8. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.

Paytm has undertaken several energy conservation initiatives as part of its commitment to environmental sustainability. These include the establishment of Paytm's Corporate Office within a Platinum LEED (Leadership in Energy and Environmental Design) certified campus, which adheres to globally recognized standards of energy efficiency and environmental performance. Further, LED lighting fixtures have been installed across the major offices of the Company, thereby contributing to a significant reduction in energy consumption and the Company's overall carbon footprint.

9. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Total Waste generated (in metric tonnes)		
Plastic waste (A)[1]	0.072	0.02
E-waste (B)[2]	1,294.74	1,385.23
Bio-medical waste (C)	NIL	NIL
Construction and demolition waste (D)	NIL	NIL
Battery waste (E)	98.69	54.38
Radioactive waste (F)	NA	NA
Other Hazardous waste. Please specify, if any. (G)	NA	NA
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector)	58.07	46.27
Total (A+B + C + D + E + F + G + H)	**1,451.57**	**1,485.90**
Waste intensity per rupee of turnover (Total waste generated/ Revenue from operations)[3]	0.000000017 MT/₹	0.000000027 MT/₹
Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total waste generated / Revenue from operations adjusted for PPP)[4]	0.00000035 MT/$ PPP	0.00000056 MT/$ PPP
Waste intensity in terms of physical output (kg/ton)	NA	NA
Waste intensity (optional) – the relevant metric may be selected by the entity[5]	0.14 MT/FTE	0.10 MT/FTE
For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)		
Category of waste		
(i) Recycled	462.08	279.55
(ii) Re-used	911.18	1,157.73
(iii) Other recovery operations[6]	20.17	2.34
Total	**1,393.43**	**1,439.62**
For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)		
Category of waste		
(i) Incineration	NIL	NIL
(ii) Landfilling	NIL	NIL
(iii) Other disposal operations	58.14	46.29
Total	**58.14**	**46.29**

Notes:

[1]Plastic waste data is available for two office locations: Bangalore and Skymark, Noida.

[2]The reported e-waste comprises waste from office operations, along with soundboxes and EDCs (Electronic Data Capture devices) collected from merchants for refurbishment, reuse, or recycling.

[3]For the purpose of calculating emission intensity per rupee of turnover for FY 2025-26, the turnover includes actual operational revenue of OCL and PPSL

[4]The PPP factor has been sourced from the IMF database for 2026 to calculate the waste intensity per rupee of turnover adjusted for PPP.

[5]The year end headcount data (as on March 31, 2026) has been considered for calculating the waste intensity per Full Time Employee (FTE).

[6]Other recovery options include battery waste that is sent back as part of a buy back program.

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, we have undertaken Reasonable Assurance on BRSR core KPIs and Limited Assurance on BRSR non-core KPIs (principle 1-9) with SGS India Private Limited.

10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.

The nature of the Company's business does not entail the use of hazardous or toxic chemicals. However, Paytm has instituted comprehensive systems for the responsible management of waste across all its locations in India, with a particular emphasis on the prudent handling of electronic waste.

Paytm's commitment to environmental responsibility extends to the disposal of e-waste and battery waste in strict compliance with the guidelines prescribed by the Central Pollution Control Board (CPCB). In line with the same, Paytm adheres to a comprehensive E-Waste Standard Operating Procedure (SOP), which ensures the appropriate and lawful disposal of e-waste arising from its business activities. To uphold these standards, Paytm engages exclusively with CPCB authorized e-waste vendors, thereby ensuring responsible and compliant e-waste management practices across its operations.

In respect of other categories of waste, Paytm has implemented a structured segregation and storage system, classifying waste into dry waste and wet waste. Paytm partners with Government authorized waste management agencies, equipped with dedicated sorting and processing facilities, to ensure that all waste generated at its premises is managed and disposed of in an environmentally responsible manner.

11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:

S. No.	Location of operations/ offices	Type of operations	Whether the conditions of environmental approval / clearance are being complied with? (Y/N) If no, the reasons thereof and corrective action taken, if any.
1	NIL	NIL	There are no offices and/or operating sites in or around ecologically sensitive areas where environmental approvals are required.

12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

Name and brief details of project	EIA Notification No.	Date	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
NA	NA	NA	NA	NA	NA

13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

Yes, the Company is in compliance with all applicable environmental laws.

S. No	Specify the law / regulation/ guidelines which was not complied with	Provide details of the non- compliance	Any fines / penalties / action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
NA	NA	NA	NA	NA

Leadership Indicators

1. **Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):**

   For each facility / plant located in areas of water stress, provide the following information:

   (i) Name of the area: Not Applicable

   (ii) Nature of operations: Not Applicable

   (iii) Water withdrawal, consumption and discharge in the following format:

Parameter	FY 2025 – 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Water withdrawal by source (in kilolitres)		
(i) Surface water	NA	NA
(ii) Groundwater	NA	NA
(iii) Third party water	NA	NA
(iv) Seawater / desalinated water	NA	NA
(v) Others	NA	NA
Total volume of water withdrawal (in kilolitres)	**NA**	**NA**
Total volume of water consumption (in kilolitres)	**NA**	**NA**
Water intensity per rupee of turnover (Water consumed / turnover)	NA	NA
Water intensity (optional) – the relevant metric may be selected by the entity (kilolitres/ton)	NA	NA

Parameter	FY 2025 – 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Water discharge by destination and level of treatment (in kilolitres)		
(i) Into Surface water	NA	NA
- No treatment	NA	NA
- With treatment- please specify level of treatment	NA	NA
(ii) Into Groundwater	NA	NA
- No treatment	NA	NA
- With treatment- please specify level of treatment	NA	NA
(iii) Into Seawater	NA	NA
- No treatment	NA	NA
- With treatment- please specify level of treatment	NA	NA
(iv) Sent to third-parties	NA	NA
- No treatment	NA	NA
- With treatment- please specify level of treatment	NA	NA
(v) Others	NA	NA
- No treatment	NA	NA
- With treatment- please specify level of treatment	NA	NA
Total water discharged (in kilolitres)	**NA**	**NA**

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, we have undertaken Reasonable Assurance on BRSR core KPIs and Limited Assurance on BRSR non-core KPIs (Principle 1-9) with SGS India Private Limited.

2. Please provide details of total Scope 3 emissions & its intensity, in the following format:

Parameter	Unit	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Total Scope 3 emissions (Break-up of the GHG into CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, if available)	Metric tonnes of CO_2 equivalent	49,800.14[1]	34,289.52
Total Scope 3 emissions per rupee of turnover	MtCO2e/₹	0.00000059[2]	0.00000062[2]
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	$MtCO_2e$/FTE	4.70[3]	2.34

Notes:

[1]Total Scope 3 emissions has been calculated by considering five (5) major categories which are mentioned below: Purchased goods & Services, Fuel & Energy Activities, Waste Generated, Employee Commute and Business Travel.

[2]For the purpose of calculating emission intensity per rupee of turnover for FY 2025-26, the turnover includes actual operational revenue of OCL and PPSL.

[3]The year end headcount data (as on March 31, 2026) has been considered for calculating the waste intensity per Full Time Employee (FTE).

Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

Yes, we have undertaken Reasonable Assurance on BRSR core KPIs and Limited Assurance on BRSR non-core KPIs (Principle 1-9) with SGS India Private Limited.

3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not Applicable

4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

Sr. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Paytm Soundbox	Paytm Soundbox provides instant audio confirmation for the amount received. It also has our All-in-One QR Code, enabling merchants to accept payments from multiple instruments like Debit & Credit Cards and UPI. The feature is available in 11 languages (English, Hindi, Kannada, Telugu, Tamil, Malayalam, Punjabi, Marathi, Gujarati, Bengali, Odia), which facilitated its usage across the country	In FY 2025-26, a total of 37,698.24 million Sound-box-based transactions have been completed through Paytm-enabled Soundboxes. This has enabled saving paper slips worth 33.15 million pounds in the last one year. (Considering each paper slip 5.7cm*10 cm, having 70 GSM paper).

5. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

Yes, Paytm maintains a formal Business Continuity and Disaster Recovery Strategy. It is governed by the Governance Risk Compliance (GRC) team, reflecting management's firm commitment to protecting operations, meeting RBI and ISO 22301 expectations. Recognizing its role as a leading financial services provider, Paytm has built its infrastructure across multiple AWS Availability Zones in Mumbai, with real-time backups replicated to a separate recovery region, so that services continue uninterrupted even if one zone fails. Recovery targets are set as per the regulatory standards and resilience is validated through mandatory bi-annual disaster-recovery drills, giving the Board sustained assurance of operational continuity.

6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.

The Company has conducted ESG assessment for its value chain partners which includes suppliers/vendors who contribute to 2% and above of the Company's purchase (by value) respectively. There were no significant adverse impacts to the environment arising from the value chain partners.

7. **Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.**

   The Company has conducted an environmental assessment covering its value chain partners, comprising suppliers/ vendors who individually account for 2% or more of Paytm's total purchases by value. The assessment evaluated key environmental parameters, including energy monitoring and management, water and waste management, and greenhouse gas accounting.

8. **How many Green Credits have been generated or procured:**

   a. By the listed entity – NIL

   b. By the top ten (in terms of value of purchases and sales, respectively) value chain partners - NIL

PRINCIPLE 7

Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

Essential Indicators

1. a. **Number of affiliations with trade and industry chambers/ associations.**

   Paytm holds memberships with Twelve (12) trade and industry bodies at the national level.

   b. **List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.**

S. No	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	Confederation of Indian Industry (CII)	National
2	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
3	Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
4	National Association of Software and Services Companies (NASSCOM)	National
5	Fintech Association for Consumer Empowerment (FACE)	National
6	SRO-FT Development Foundation (also known as India Fintech Foundation)	National
7	Internet and Mobile Association of India (IAMAI) /Fintech Convergence Council (FCC)/Payments Council of India (PCI)	National
8	Unified Fintech Forum (UFF)	National
9	Self-Regulated PSO Association (SRPA)	National
10	Public Affair Forum of India (PAFI)	National

Note: This is an indicative list of trade and industry chamber/association

2. **Provide details of corrective action taken or underway on any issues related to anti- competitive conduct by the entity, based on adverse orders from regulatory authorities.**

Name of authority	Brief of the case	Corrective action taken
There were no incidents of anti-competitive behavior involving the Company during FY 2025-26.		

Leadership Indicators

1. Details of public policy positions advocated by the entity:

S. No.	Public Policy advocated	Method resorted for such advocacy	Whether information available in public domain? (Yes/No)	Frequency of review by Board (Annually / Half yearly/ Quarterly/ Others - please specify)	Web Link, if available
1	Inclusion of Non Banks under the Financial Inclusion Fund (FIF) scheme of NABARD	Note submitted to industry bodies	No	NA	NA
2	Extension of Payments Infrastructure Development Fund (PIDF) scheme	Note submitted to industry bodies	No	NA	NA

PRINCIPLE 8

Businesses should promote inclusive growth and equitable development

Essential Indicators

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes/No)	Results communicated in public domain (Yes / No)	Relevant Web link
NA	NA	NA	NA	NA	NA

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

S. No.	Name of Project for which R&R is ongoing	State	District	No. of Project Affected Families (PAFs)	% of PAFs covered by R&R	Amounts paid to PAFs in the FY (In ₹)
NIL						

3. Describe the mechanisms to receive and redress grievances of the community.

Paytm actively engages with communities as part of its Corporate Social Responsibility (CSR) and community development programmes. As part of these efforts, the team maintains regular interactions with implementing agencies or organisations and communities to implement the projects and thereby ensuring that the Company's initiatives remain responsive to the needs of the communities it serves.

4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

Particulars	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Directly sourced from MSMEs/ small producers	14.09%	10.00%
Directly from within India	84.66%	79.00%

5. **Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost**

Location	FY 2025 - 26 Current Financial Year	FY 2024 - 25 Previous Financial Year
Rural	0.00%	0.00%
Semi-urban	0.19%	0.21%
Urban	59.14%	57.48%
Metropolitan	40.67%	42.31%

Note: The percentages are calculated on the basis of CTC for the employees active as on March 31, 2026 (for FY26) and March 31, 2025 (for FY25).

RBI Classification on the website was done on the basis of District. Paytm has used office locations of the employees to map according to rural, urban, semi-urban and metropolitan.

For ease of calculation, Paytm has considered the maximum count of location (rural/semi-urban/urban/metropolitan) to map cities against each category. RBI website has different categories (rural/semi-urban/urban/metropolitan) for the same district.

Leadership Indicators

1. **Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):**

Details of negative social impact identified	Corrective action taken
NA	

2. **Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:**

OCL

S. No.	State	Aspirational District	Amount spent (In ₹)
1	**Delhi** Donation of books, winter uniform and other stationary to underprivileged students of Government schools	No	10.00 Lakhs
2	**Delhi** Infrastructure Development for Education and Training at Shankara Vidya Kendra	No	25.00 Lakhs
3	**Jaipur, Rajasthan** Scholarship Program for engineering students at Malaviya National Institute of Technology (MNIT)[1]	No	10.00 Lakhs

[1]**Note:** The amount has been disbursed to Paytm Foundation in November 2025, it will be disbursed to MNIT in FY 2026-27.

PPSL

S. No.	State	Aspirational District	Amount spent (In ₹)
1	**Delhi** (Partnered with Anchal Charitable Trust for Screening and Distribution of 80 Assistive Aids and Appliances for Persons with Disabilities)	No	12.08 Lakhs
2.	**Andhra Pradesh** (Partnered with BREDS NGO for Setting up well-equipped computer labs in two government schools to improve digital literacy)	Yes	11.10 Lakhs

S. No.	State	Aspirational District	Amount spent (In ₹)
3.	**Karnataka** (Partnered with Shiksha Seva Foundation for supporting the fees of 24 engineering students at Scaler School of Engineering)	No	25.00 Lakhs
4.	**Odisha** (Donation of a mobile bus to Veer Surendra Sai University of Technology (VSSUT) equipped with laptops, screen, printer, and other digital tools to University for digital skilling and financial literacy of underprivileged students in Sambalpur)	No	55.00 Lakhs
5.	**Uttar Pradesh** (Preventing Health by donating water cooler with RO facilities for patients and staff of Government Institute of Medical Sciences (GIMS), Greater Noida.)	No	2.00 Lakhs

3. **(a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)**

Paytm does not have a preferential procurement policy addressing the above parameters.

(b) From which marginalized /vulnerable groups do you procure?

Not Applicable.

(c) What percentage of total procurement (by value) does it constitute?

Not Applicable

4. **Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:**

S. No.	Intellectual Property based on traditional knowledge	Owned/ Acquired (Yes/No)	Benefit shared (Yes/ No)	Basis of calculating benefit share1.
		NA		

5. **Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.**

S. No.	Name of the Authority	Brief of the case	Corrective action taken
		NA	

6. **Details of beneficiaries of CSR Projects.**

OCL

S. No.	CSR Project/Programme	Number of Persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
1	Donation of school books, school winter uniform and other stationary	200	100.00%
2	Infrastructure Development for Education and Training at Shankara Vidya Kendra	100 Annually	100.00%

PPSL

S. No.	CSR Project/Programme	Number of Persons benefitted from CSR projects	% of beneficiaries from vulnerable and marginalized groups
1	Screening and Distribution of 80 assistive Aids and Appliances for Persons with Disabilities	80	100.00%
2	Setting up well-equipped computer labs in two government schools, along with capacity building for teachers and training of students in Andhra Pradesh.	300+	100.00%
3	Supporting for the fees of 24 engineering students at Scaler School of Engineering	24	100.00%
4	Donation of a mobile bus equipped with laptops, screen, printer, and other digital tools to VSSUT University for digital skilling and financial literacy of underprivileged students in Sambalpur	200 annually	100.00%
5	Preventing Health by donating water cooler with RO facilities for patients and staff of Government Institute of Medical Sciences (GIMS), Greater Noida by Paytm Foundation	2,000 per day	100.00%

PRINCIPLE 9

Businesses should engage with and provide value to their consumers in a responsible manner

Essential Indicators

1. **Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

   Paytm values the trust extended by its customers and merchants and remains committed to delivering a superior service experience. This grievance policy has been formulated to ensure prompt, efficient, fair, and respectful resolution of all concerns raised by merchants and customers.

   The Company endeavors to provide a seamless transaction experience across the Paytm and Paytm for Business applications. In-app support channels are available to both customers and merchants, and the grievance redressal framework set out below has been structured to facilitate timely resolution.

   OCL

   Incident Handling Framework

   OCL has categorized its incident handling process according to the nature of services offered:

   - **Merchant Loan Services –** Queries pertaining to Merchant Loans and Business Loans.
   - **Consumer Services –** Queries relating to UPI, Recharge and Utilities, Education, Profile, Gold, Credit Card Bill Payment, Transit, Deals, and Credit Cards.
   - **Consumer Lending Services –** Queries pertaining to Personal Loans, Paytm Postpaid.

   Service Levels

   Level 1 – Complaint Registration

   - **Merchant Loan Services:** Complaints may be registered via mobile at https://b.paytm.me/help-support
   - **Consumer Services and Consumer Lending Services:** Complaints may be registered via mobile at https://m.paytm.me/CustomerSupport

Resolution Timelines:

- Consumer Services and Consumer Lending Services: An initial response is generally issued within 2 hours of receipt of the complaint, with the objective of resolution within 2 business days. In the event of any delay, the complainant shall be proactively updated.
- Merchant Loan Services: An initial response is generally issued within 24 hours, with resolution timelines dependent upon the nature of the complaint.

Level 2 – Escalation of Grievances

Should a complaint remain unresolved at Level 1, the complainant may escalate the matter to the Level 2 grievance management team. Escalation is permitted only where a valid Level 1 ticket exists, which may be accessed through the "View Tickets" section under Help & Support within the application.

- **Merchant Loan Services:** grievance.businessloan@paytm.com
- **Consumer Services:** customer.resolution@paytm.com
- **Consumer Lending Services:** grievance-redressal_loandistribution@paytm.com

Resolution Timelines: An initial response is generally provided within 24 hours of escalation, with the objective of closing all Level 2 complaints within 2 business days. Any anticipated delays shall be proactively communicated to the complainant.

Note: Matters escalated to Level 2 must first have been raised at Level 1, and escalation is permissible only where the issue remains unresolved within the stipulated resolution timeline. Complaints that bypass the prescribed levels shall be redirected accordingly.

Prior to raising a complaint, customers and merchants are encouraged to consult the Help Pages within the Paytm application, where several common concerns are addressed.

PPSL

Redressal Mechanism for Merchants and Customers

Level 1: Complaint Registration

Service Categories

a. Offline Payments

Applicable for queries related to: Soundbox Device, Paytm All-in-one QR Code, Point Of Sale Machine, Payments & Settlement, Subscription, Merchant Profile & General Queries.

b. Online Payments

Applicable to queries related to Payment Gateway, Payment Links, Payments & Settlement, Subscription, Router, and Merchant Profile.

Complainants may register grievances through the following channels:

- **Offline Payments:** Complainants can register their complaint through the Paytm for Business App help and support by accessing the following link via mobile: https://b.paytm.me/gethelp. Alternatively, a complainant may register their complaint by calling 0120-4440440.
- **Online Payments:** Complainant can register their complaints via email (pg.support@paytmpayments.com). Merchants can raise a ticket through the PPSL Unified Merchant Dashboard under the "Need Help" section by accessing the following link; https://dashboard.paytmpayments.com/next/need-help.
- **Complainants for both Offline & Online Payments** can also send a written complaint via Post/ Courier to the below address. The Nodal Officer, Customer Grievance Redressal and Dispute Management, Paytm Payments Services Limited, One Skymark, Floor 11, Tower-D, Plot No. H-10B, Sector-98, Noida-201304.
- **Complainants for both Offline & Online Payments** can also visit the below premises for any complaints: Paytm Payments Services Limited, One Skymark, Ground Floor, Tower-D, Plot No. H-10B, Sector-98, Noida-201304.

Resolution Timelines:

- **Failed or Unsuccessful Transactions:** Resolution shall be provided within 5 working days. A "failed transaction" refers to a transaction that has not been fully completed for reasons not attributable to the customer, including disruption of communication links, session timeouts, or non-credit to the beneficiary's account.
- **All Other Complaints:** Resolution shall be provided within 10 working days from the date of receipt of the complaint by PPSL.
- Resolution time does not include time taken by the Complainant to provide required information/ documentation. Resolution time may also extend to 30 days for delivery requests destined for Tier 3 cities and beyond due to inherent logistics and courier constraints in these regions

Level 2: Grievance Officer

In the event that a resolution is not provided within the stipulated timeline at Level 1, or the Complainant is dissatisfied with the resolution offered, the matter may be escalated to the Nodal Officer.

The Nodal Officer shall ensure that an effective resolution is delivered within 15 working days from the date of escalation.

Nodal Officer Details:

- Name: Ms. Deepa Pandey, Principal Nodal Officer
- Email: nodal.officer@paytmpayments.com

Note: The resolution time does not include any period during which the matter is pending with the Complainant for the provision of requisite information or documentation.

Where a case or transaction involves a third party or falls outside the purview of the entity, the turnaround time shall be subject to the timelines of the relevant Partner Banks, Network Providers, or other intermediaries. The total resolution time shall comprise such external turnaround time in addition to the entity's internal resolution time.

In exceptional circumstances where the entity is unable to arrive at a conclusion within 15 working days, PPSL shall communicate the reasons for the delay along with an indication of when a final response may be expected, which shall in any event be within 30 business days from the date of receipt of the complaint.

Complainants are required to approach Level 2 with the Service Request Number from the preceding level on which a response was either not received or was not satisfactory. This requirement is intended to ensure timely and accurate resolution.

Acknowledgement and Tracking of Complaints

The entity generates an automated ticket (Service Request Number) at each level to enable the Complainant to track the status of the grievance. Paytm endeavors to acknowledge all complaints promptly upon receipt.

Level 3 - Lodging Complaint with RBI Ombudsman

If any Complainant is not satisfied with response/ resolution of PPSL, he/she can reach to Ombudsman with his/ her complaint or resort to other legal avenues for grievance redressal under Integrated Ombudsman Scheme as issued by RBI.

a. Link to log a complaint : https://cms.rbi.org.in

b. Address for physical complaint letter : Reserve Bank of India, 4th Floor, Sector 17, Chandigarh - 160017

c. For any guidance in filing of a complaint or any other support one can connect to toll-free number : 14448

d. For further information, please refer to the RBI Ombudsman Guidelines: https://rbidocs.rbi.org.in/rdocs/content/pdfs/RBIOS2021_121121.pdf

Important Note

If a complaint is escalated to Level 2 or Level 3, it must have first been raised at the preceding level(s). Escalations should only be initiated after the resolution timelines at the previous level have elapsed.

2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

Particulars	As a percentage to total turnover[1]
Environmental and social parameters relevant to the product	Soundbox - 14.17% POS Machine - 3.62%
Safe and responsible usage	Soundbox - 14.17% POS Machine - 3.62%
Recycling and/or safe disposal	Soundbox - 14.17% POS Machine - 3.62%

[1]**Note:** The reported figures are based on restated financials of PPSL that incorporate eight months of revenue from the offline merchant payments business under the holding company i.e OCL. Although the offline merchant payments business was transferred from OCL to PPSL effective from midnight of November 30, 2025, the financial figures have been restated for PPSL as per the applicable accounting standards requiring the disclosure of a full year of operations.

3. Number of consumer complaints in respect of the following:

	FY 2025 – 26 Current Financial Year			FY 2024 - 25 Previous Financial Year		
	Received during the year	Pending resolution at end of year	Remark	Received during the year	Pending resolution at end of year	Remark
Data privacy	40	0	All complaints are resolved as on date of the report	49	15	All complaints have been resolved as on the date of the report
Advertising	NIL	NIL	NA	NIL	NIL	NA
Cyber-security	NIL	NIL	NA	NIL	NIL	NA
Delivery of essential services	NIL	NIL	NIL	NIL	NIL	NIL
Restrictive Trade Practices	NA	NA	NA	NA	NA	NA
Unfair Trade Practices	NA	NA	NA	NA	NA	NA
Others[1]	18,908 (OCL:10,249 PPSL: 8,659)	1,324	Source of complaints: OCL: L2 and above grievance redressal channels. PPSL: L1 complaints and above grievance redressal channels All 1,324 complaints have been resolved as of the date of the report.	9,892	59	Source of complaints: RBI, BO, GRO, Nodal, Grievance (Level 2 mechanism). All complaints have been resolved as of the date of the report

[1]**Note:** OCL continues to follow its existing reporting methodology, which includes only L2 and above complaints. PPSL reports customer and merchant complaints in accordance with its own Grievance Redressal Policy, including L1, L2, and L3 complaints for the data starting April 1, 2025. Accordingly, complaint volumes between OCL and PPSL are not directly comparable.

4. Details of instances of product recalls on account of safety issues:

S. No	Number	Reason for Recall
Voluntary Recall	NIL	NIL
Forced Recall	NIL	NIL

5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.

Yes, the Company has put in place a structured framework to manage cyber security and data privacy risks, supported by formally adopted policies that govern the protection of information assets and the responsible handling of personal data across its operations.

Recognizing that trust is fundamental to its business, Paytm treats the security of digital infrastructure and the confidentiality of stakeholder data as core operational priorities. The framework is built on a combination of technology controls, defined processes, employee accountability and independent oversight, and is periodically reviewed to keep pace with the evolving threat landscape and regulatory expectations.

Key features of the framework include:

- **Defined Governance:** Clear ownership and accountability for information security and privacy, with designated officers responsible for policy implementation, monitoring and grievance redressal.
- **Risk-based Approach:** Periodic risk assessments, vulnerability testing and audits are carried out to identify, evaluate and address cyber security and privacy risks in a timely manner.
- **Technology and Access Controls:** Deployment of measures such as encryption of sensitive data, multi-factor authentication, role-based access on a need-to-know basis, endpoint security, network monitoring and data leakage prevention tools.
- **Privacy by Design:** Personal data is collected only to the extent necessary for delivering products and services, processed lawfully with appropriate consent, and retained in line with legal and business requirements. Stakeholders are provided rights over their data, including access, correction and withdrawal of consent.
- **Acceptable Use of Systems:** Clearly defined standards govern the use of IT assets, devices, email, internet and third-party platforms, with prohibitions on activities that may compromise security or confidentiality.
- **Incident Response:** A structured incident management mechanism enables timely detection, reporting, escalation and resolution of security incidents and data breaches, including notifications to affected stakeholders and regulators where required.
- **Awareness and Capability Building:** Regular training, communications and awareness initiatives equip employees and relevant third parties to recognize threats such as phishing and social engineering and to handle sensitive information responsibly.
- **Alignment with Standards:** Practices are benchmarked against applicable laws and recognized standards covering information security and payment data protection, with periodic internal and external assurance reviews.

Web-links to the relevant policies:

1. Information Security Policy: https://paytm.com/document/ir/policies-and-guidelines/Information_Security_Policy.pdf
2. Acceptable Usage Policy: https://paytm.com/document/ir/policies-and-guidelines/Acceptable_Usage_Policy.pdf
3. Privacy Policy: https://paytm.com/company/privacy-policy

6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.

During FY 2025-26, no incidents have been reported, requiring corrective actions in cyber security, or product recalls occurred, nor were there penalties from regulatory authorities regarding product/service safety.

7. Provide the following information relating to data breaches:

a. Number of instances of data breaches:
No cases of data breach were found

b. Percentage of data breaches involving personally identifiable information of customers:
The Company did not witness any instances of data breaches during the FY 2025 -26.

c. Impact, if any, of the data breaches:
Not Applicable

Leadership Indicators

1. **Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).**

   Information on the Company's products and services is available on the website, Company blog, and social media channels (Facebook, Twitter, Instagram). These platforms are regularly updated to keep consumers informed about our offerings.

   - Our Website: https://paytm.com/
   - Paytm Blogs: https://paytm.com/blog/
   - Paytm For Business Blogs: https://business.paytm.com/blog/category/merchant-experience/
   - Paytm Application (Google Play store) - https://play.google.com/store/apps/details?id=net.one97.paytm
   - Paytm Application for Business (Google Play Store) - https://play.google.com/store/apps/details?id=com.paytm.business
   - Paytm Application (App store)- https://apps.apple.com/in/app/paytm-secure-upi-payments/id473941634
   - Paytm Application for Business (App store) - https://apps.apple.com/in/app/paytm-for-business/id1351301966
   - Facebook: https://www.facebook.com/Paytm/
   - OCL - Instagram page: @Paytm
   - PPSL - Instagram: Paytmforbusiness (@paytmbusiness) · Noida
   - LinkedIn page: https://www.linkedin.com/company/paytm/
   - OCL - Twitter page: @Paytm
   - PPSL - Twitter/X: https://x.com/PaytmBusiness
   - OCL - YouTube page: https://www.youtube.com/paytm
   - PPSL - YouTube: https://www.youtube.com/channel/UC3pT4dMwybOcIle-Mo9AXCQ

2. **Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.**

   Paytm maintains sustained engagement with its customers through a diverse array of communication channels. These initiatives are designed to educate customers and promote vigilance against cyber fraud. They also encourage the responsible usage of the financial services offered by the Company, including digital payments, mobile recharges, utility bill payments, ticketing, and other financial services. In addition, they serve to keep customers apprised of the latest developments within the industry.

   In addition, the Company is undertaking the following initiatives to educate merchants regarding the responsible usage of its products and services:

   - **In-App Notifications:** Timely alerts are disseminated to users through the application, covering safe usage practices, fraud prevention measures, and regulatory updates.
   - **Blog and Website Updates:** Articles and advisory guides are regularly published on the Company's blog and website, addressing matters such as UPI safety, secure payment practices, and consumer advisories.
   - **Social Media Campaigns:** Awareness content pertaining to safe digital payments is disseminated across leading social media platforms, including Facebook, Instagram, Twitter/X, and YouTube.
   - **FAQs and Help Centre:** A comprehensive FAQ section is maintained on the application and website to guide users on responsible product usage and dispute resolution mechanisms.
   - **Press Statements and Consumer Advisories:** Periodic press communications are issued to highlight safety measures and to alert consumers to emerging risks within the digital payments ecosystem.

   Through the effective utilization of these platforms, Paytm reaffirms its commitment to safeguarding customer interests and promoting awareness in an increasingly dynamic digital environment.

3. Mechanisms in place to inform consumers of any risk of disruption/ discontinuation of essential services.

To ensure the customers are immediately informed of any service disruptions, Paytm promptly sends out app notifications, post updates on social media, publish blogs and engage directly, keeping the users well-prepared and informed at all times.

4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

Yes, we duly acknowledge the importance of providing our customers with adequate, clear, and transparent information pertaining to our products. In line with this commitment, Paytm strictly adheres to all applicable local regulations, including the guidelines prescribed by the Bureau of Indian Standards (BIS) and the Legal Metrology norms governing Maximum Retail Price (MRP) declarations and product packaging.

The packaging carries the requisite consumer precautionary symbols and disclosures, including guidelines for safe handling, recycling, and e-waste disposal. Comprehensive consumer grievance redressal information has also been provided, comprising the registered complaint address, along with the dedicated email ID (soundbox.support@paytmpayments.com), helpdesk number (0120-4440440), and the official website (https://www.paytmpayments.com/).

The aforementioned disclosures collectively demonstrate the Company's full compliance with the labelling, packaging, and consumer-information requirements stipulated under the BIS and Legal Metrology frameworks.

Yes, Paytm conducts customer satisfaction surveys for every query, request, or complaint raised by customers. A survey is triggered at the end of each interaction on the customer service flow to gather feedback on the resolution experience. This helps us assess and enhance customer satisfaction across our major products/services

Independent Reasonable and Limited Assurance Statement

To,
The Board of Directors,
One 97 Communications Limited

Nature of Assurance

SGS India Private Limited (hereinafter referred to as 'SGS India') was engaged by One 97 Communications Limited (OCL) (the 'Company') to conduct an independent assurance of the Company's Business Responsibility and Sustainability Reporting (BRSR) (the 'Report') for the reporting period of April 1, 2025, to March 31, 2026. SGS India has conducted a Reasonable level of Assurance for the BRSR core Indicators and a Limited level of Assurance for the remaining BRSR parameters, including Essential and Leadership indicators and all disclosures made thereunder. This assurance engagement was conducted in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised) and ISAE 3410.

Reporting Framework

The Report has been prepared following

1. Master Circular for compliance with the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 by listed entities. (Circular: HO/49/14/14(7)2025-CFD POD2/I/3762/2026; Last updated on Jan 30, 2026)
2. Greenhouse Gas Protocol Standard.

Intended Users of this Assurance Statement

This Assurance Statement is provided with the intention of informing all OCL's internal and external Stakeholders.

Responsibilities

The information in the report and its presentation is the responsibility of the management of the Company. SGS India has not been involved in the preparation of any of the material included in the report.

Our responsibility is to express an opinion on the text, data, and statements within the defined scope of assurance, aiming to inform the management of the Company, and in alignment with the agreed terms of reference. We do not accept or assume any responsibility beyond this specific scope. The Statement shall not be used for interpreting the overall performance of the Company, except for the aspects explicitly mentioned within the scope.

Assurance Standard

SGS has conducted a Reasonable level of Assurance for BRSR core parameters under 9 ESG Attributes and Limited level assurance for the remaining BRSR parameters, including all Essential & Leadership indicators as specified under BRSR standards and amendments made as on date. This engagement was performed in accordance with the International Standard on Assurance Engagement (ISAE) 3000 (revised) and ISAE 3410 (Assurance Engagements other than Audits or Reviews of Historical Financial Information).

Our evidence-gathering procedures were designed to obtain a 'Reasonable' level of assurance (for BRSR Core Indicators), which is a high level of assurance & a 'Limited' level of assurance (for BRSR Non-Core Indicators), which is a medium level of assurance in accordance with ISAE 3000(revised) standard, but is not absolute certainty. It involves obtaining sufficient appropriate evidence to support the conclusion that the information presented in the report is fairly stated and is free from material misstatements.

Statement of Independence and Competence

The SGS Group of companies is the world leader in inspection, testing, and assurance, operating in more than 140 countries and providing services including management systems and service certification; quality, environmental, social, and ethical auditing and training; and environmental, social, and sustainability report assurance. SGS India affirms our independence from One 97 Communications Limited (OCL), being free from bias and conflicts of interest with the organization, its subsidiaries, and stakeholders.

The assurance team was assembled based on their knowledge, experience, and qualifications for this assignment, and comprised auditors registered with ISO 26000, ISO 20121, ISO 50001, SA8000, RBA, QMS, EMS, SMS, GPMS, CFP, WFP, GHG Verification, and GHG Validation Lead Auditors, and experience on the SRA Assurance.

Scope of Assurance

The assurance process involved assessing the quality, accuracy, and reliability of BRSR Indicators (KPIs) within the report for the period April 1, 2025, to March 31, 2026. The reporting scope and boundaries include 1 Head office (Noida) and 89 other offices spread across different states in India.

Note: The verification boundary includes One 97 Communications Limited (OCL) and its wholly owned subsidiary, Paytm Payments Services Limited (PPSL).

Assurance Methodology

The assurance comprised a combination of desktop review, interaction with the key personnel engaged in the process of developing the report, on-site visits, and remote verification of data. Specifically, SGS India undertook the following activities:

- Assessment of the suitability of the applicable criteria in terms of their comprehensiveness, reliability, and accuracy.
- Interaction with key personnel responsible for collecting, consolidating, and calculating the BRSR core and non-core KPI's, and assessing the internal control mechanisms in place to ensure data quality.
- Application of analytical procedures and verification of documents on a sample basis for the compilation and reporting of the KPIs.
- Assessing the aggregation process of data at the Head Office level.
- Critical review of the report regarding the plausibility and consistency of qualitative and quantitative information related to the KPIs.

Limitations

SGS India did not come across any limitation to the agreed scope of the assurance engagement. SGS India verified data on a sample basis; the responsibility for the authenticity of the data entirely lies with the Company. The assurance scope excluded forward-looking statements, product- or service-related information, external information sources, and expert opinions. SGS India has not been involved in the evaluation or assessment of any financial data/performance of the company. Our opinion on financial indicators is based on the third-party financial reports audited by the Company. SGS India does not take any responsibility for the financial data reported in the audited financial reports of the Company.

The assurance scope excludes:

- Disclosures other than those mentioned in the assurance scope.
- Data reviews outside the operational sites as mentioned in the reporting boundary.
- Validation of any data and information other than those presented in “Findings and Conclusions.”
- The assurance engagement considers an uncertainty of ±5% based on the materiality threshold for Assumption/ estimation/measurement errors and omissions.
- The Company’s statements that describe the expression of opinion, belief, aspiration, expectation, aim to future intention provided by the Company, and assertions related to Intellectual Property Rights and other competitive issues.
- Mapping of the Report with reporting frameworks other than those mentioned in the Reporting Criteria above.

Findings and Conclusions

BRSR Core Indicators:

Based on the procedures we have performed and the evidence we have obtained, we are satisfied that the information presented by the Company in its report, on the Core Indicators (Annexure A) is complete, accurate, reliable, fairly stated in all material respects, and is prepared in line with the BRSR requirements.

BRSR Non-Core Indicators:

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the data reported (Annexure B) in the BRSR report are not prepared, in all material respects, in accordance with the reporting criteria.

Annexure A

The list of BRSR Core Indicators that were verified within this assurance engagement is given below:

Sr. No.	BRSR Core Attribute	BRSR Core Indicator
1	Greenhouse gas (GHG) footprint	• Total scope 1 emissions • Total scope 2 emissions • GHG emission intensity (scope 1 +2)
2	Water footprint	• Total water consumption • Water consumption intensity • Water discharge by destination and levels of treatment
3	Energy footprint	• Total energy consumed • % of energy consumed from renewable sources • Energy intensity
4	Embracing circularity	• Plastic waste • E-waste • Bio medical waste • Construction and demolition waste • Battery waste • Radioactive waste • Other hazardous waste • Other non-hazardous waste • Total waste generated • Waste intensity • Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations. • For each category of waste generated, the total waste disposed off by the nature of the disposal method
5	Employee well-being and safety	• Spending on measures towards the well-being of employees as a % of the total revenue of the Company • Details of safety-related incidents for employees
6	Enabling gender diversity in business	• Gross wages paid to females as % of wages paid. • Complaints on POSH
7	Enabling inclusive development	• Input material sourced from MSMEs/ small producers as % of total purchases. • Job creation in smaller towns: Wages paid to people employed in smaller towns as % of total wage cost
8	Fairness in engaging with customers and suppliers	• Instances involving loss/breach of data of customers as a percentage of total data breaches or cybersecurity events. • Number of days of accounts payable
9	Openness of business	• Concentration of purchases & sales done with trading houses, dealers, and related parties • Loans and advances & investments with related parties

Annexure B

The BRSR (Core and Non-Core) indicators that were subject to verification under this assurance engagement are detailed below:

Section A (Limited Assurance)	General Disclosures	
Section B (Limited Assurance)	Management and process disclosures	
Section C	**Limited Assurance - Essential and Leadership (Non-Core) Indicators**	**Reasonable Assurance - Core Indicators**
Principle 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.	1,2,3,4,5,6,7	8,9
Principle 2: Businesses should provide goods and services in a manner that is sustainable and safe.	1,2,3,4,5	-
Principle 3: Businesses should respect and promote the well-being of all employees, including those in their value chains.	1,2,3,4,5,6,7,8,9,10,12,13, 14,15	1(C),11
Principle 4: Businesses should respect the interests of and be responsive to all its stakeholders.	1,2,3	-
Principle 5: Businesses should respect and promote human rights.	1,2,3,4,5,6,8,9,10,11	3 (b),7
Principle 6: Businesses should respect and make efforts to protect and restore the environment.	1,2,3,4,5,6,8,10,11,12,13	1,3,4,7,9
Principle 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.	1,2	-
Principle 8: Businesses should promote inclusive growth and equitable development.	1,2,3,4,5,6	4,5
Principle 9: Businesses should engage with and provide value to their consumers in a responsible manner	1,2,3,4,5,6	7

For and on behalf of SGS India Private Limited

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