Groww Asset Management Limited
Corporate Social Responsibility (CSR) Policy

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Groww Asset Management Limited ("Groww AMC"/ "Company") is the investment manager of Groww Mutual Fund and it manages various funds of Groww Mutual Fund. Our CSR vision is to lead with purpose - driving inclusive growth and leaving a lasting, positive impact on the people and places we serve.

1. CSR Objective and Scope

We believe that when knowledge, community, and sustainability come together, they have the power to shape a better tomorrow. Our CSR efforts are driven by this belief as we strive to create inclusive and sustainable communities by promoting education, including research and development, skill development, and healthcare; enabling access to essential services through technology and infrastructure; supporting environmental conservation; and fostering social and economic empowerment.

This Policy has been formulated and recommended by the Corporate Social Responsibility Committee (CSR Committee) and adopted by the Board of Directors at its meeting held on October 23, 2025. The Board may, upon recommendation of the CSR Committee, amend or modify this CSR Policy as and when necessary.

2. Aligning to Regulatory Compliances

The CSR policy is aligned to the requirements of Section 135 of the Companies Act, 2013, along with the Companies (Corporate Social Responsibility Policy) Rules 2014, and is aligned with the activities specified in Schedule VII of the Act, as amended from time to time. The Policy also adheres to any other circulars, clarifications, or guidelines issued by the Ministry of Corporate Affairs (MCA) relating to Corporate Social Responsibility.

3. CSR Spends, Treatment of Unpent Amount

In accordance with Section 135(5) and (6) of the Companies Act, 2013, the Company shall spend at least 2% of the average net profits of the three immediately preceding financial years on CSR activities, excluding activities undertaken in the normal course of business. Any unspent amount relating to an ongoing project shall be transferred to the Unspent CSR Account within 30 days from the end of the financial year and utilized within three financial years. Unspent amounts not related to ongoing projects shall be transferred to a fund specified in Schedule VII within six months from the end of the financial year.

4. Annual Action Plan and Reporting

The CSR Committee shall prepare and recommend an Annual Action Plan to the Board, outlining the list of approved CSR projects, implementation timelines, budgets, monitoring mechanisms, and impact assessment (where applicable). The progress of CSR initiatives will be reviewed regularly, along with mode of execution, fund utilization modalities, implementation timelines, monitoring and reporting mechanisms and any applicable need or impact assessments.

The Board of Directors shall ensure that the funds disbursed are used for the approved purposes and in the approved manner

5. Implementing Mechanism

Our CSR initiatives would be implemented in collaboration with NGOs, trusts, societies, Section 8 companies, reputed institutions, and other partner organizations that have relevant expertise in the focus areas.

6. Monitoring Mechanism

The CSR Committee is responsible for formulating and recommending the CSR Policy and Annual Action Plan and proposing the CSR budget as required under the Act. The committee will establish a structured mechanism, to regularly track the progress of CSR projects. Each initiative will have defined objectives, timelines, and measurable outcomes. Periodic reviews will be conducted to assess implementation status, ensure alignment with approved plans, and address any gaps. Updates will be shared with the Board for oversight and guidance.

7. Impact Assessment

The Company will carry out impact assessments for applicable CSR projects. These may be conducted by implementing partners, such as NGOs or institutions involved in the project, and will help assess the outcomes and effectiveness of the initiatives. The insights gathered will be included in the Annual Report and will inform future CSR strategy and planning.

8. Overall

We want to put to good use the opportunity we have to serve by creating meaningful, lasting impact. Through our CSR efforts, we strive to bring real, positive change and contribute value to the communities we are connected with.

9. Version Control

Version	**CSR Committee Approved Date**	**Board of Directors Approved Date**
v1	October 14, 2025	October 23, 2025