



August 05, 2025

**BSE Limited**

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

**National Stock Exchange of India Limited**

The Listing Department,  
Exchange Plaza,  
Bandra Kurla Complex,  
Mumbai - 400 051

Scrip Code: 543396

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 2024-25**

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 2024-25, along with Independent Assurance Statement, issued by TUV 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**  
**Company Secretary and Compliance Officer**  
*Encl.: As above*

One 97 Communications Limited

[compliance.officer@paytm.com](mailto:compliance.officer@paytm.com)

[www.paytm.com](http://www.paytm.com)

Corporate Office - One Skymark, Tower-D, Plot No. H-10B, Sector-98, Noida-201304

T: +91120 4770770 F: +91120 4770771 CIN: L72200DL2000PLC108985

Registered Office - 136, First Floor, Devika Tower, Nehru Place, New Delhi-110019

# Business Responsibility & Sustainability Reporting



## SECTION A: GENERAL DISCLOSURES

### I. Details of the Company

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	<a href="mailto:compliance.officer@paytm.com">compliance.officer@paytm.com</a>
7	Telephone	+91-120-4770770
8	Website	<a href="http://www.paytm.com">www.paytm.com</a>
9	Financial year for which reporting is being done	FY 2024-25
10	Name of the Stock Exchange(s) where shares are listed	The Equity shares of the Company are listed and traded on National Stock Exchange of India Limited (NSE) and Bombay Stock Exchange Limited (BSE)
11	Paid-up Capital	₹63,78,45,483
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: <a href="mailto:compliance.officer@paytm.com">compliance.officer@paytm.com</a>
13	Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together).	Standalone
14	Name of assurance provider	TUV India Private Limited
15	Type of assurance obtained	BRSR Core Indicators - Reasonable Assurance BRSR Essential Indicators (Principle 1 - 9) - Limited Assurance

### II. Products/services

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

S. No	Description of Main Activity	Description of Business Activity	% of Turnover of the entity
1	Payment and Financial Services	<b>Payment Services</b> for consumers and merchants, which enables them to send and receive payments both online and in-store. <b>Financial Services</b> include digital distribution of credit, insurance, mutual funds distribution and equity broking for consumers and merchants.	81.6%
2	Marketing Services	<b>Marketing Services</b> include ticketing for travel, deals and gift vouchers. It also includes advertising and credit card distribution for merchants.	18.4%

**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 the Company (including its subsidiary) 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, the Company also offers digital distribution of credit, insurance, mutual funds distribution 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%

**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*	0	68	68
International#	0	15	15

\*Note: National locations represent corporate office, regional offices and fleet hubs.

#Note: International locations represent the number of registered offices of the subsidiaries of the Company.

**19. Markets served by the entity:****a. Number of locations**

Locations	Number
National (No. of States)	The Company provides services in all states in India
International (No. of Countries)*	16

\*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 2024-25, either by the Company, or by its subsidiaries.

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

Less than 1%

**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 7.29 Crore transacting users (average of FY 2024-25) 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.

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 4.40 crore merchants as of March 2025.

## 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)*	14,656	13,619	92.92%	1,037	7.08%
2.	Other than Permanent (E)	NIL	NIL	NIL	NIL	NIL
3.	Total employees (D + E)	14,656	13,619	92.92%	1,037	7.08%
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

\*Permanent Employees include Full Time Sales and Non-Sales employees.

**Note:** Higher ratio of male employees is reflective of majority of employees being in field sales which has a higher ratio of male employees.

Definition according to SEBI Guideline on BRSR Page 3: ([https://www.sebi.gov.in/sebi\\_data/commondocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure2\\_p.PDF](https://www.sebi.gov.in/sebi_data/commondocs/may-2021/Business%20responsibility%20and%20sustainability%20reporting%20by%20listed%20entitiesAnnexure2_p.PDF))

#### 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) #	9	9	100%	NIL	NIL
2.	Other than Permanent (E)	NIL	NIL	NIL	NIL	NIL
3.	Total differently abled employees (D + E)	9	9	100%	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 differently abled workers (F + G)	NIL	NIL	NIL	NIL	NIL

**#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

	Total (A)	No. and Percentage of females	
		No. (B)	% (B / A)
Board of Directors*	8	1	12.50%
Key Management Personnel	3	0	0

\*Note: [Details of Board of Directors](#)

## 22. Turnover rate for permanent employees and workers

(Disclose trends for the past 3 years)

	FY 2024-25 Current Financial Year			FY 2023-24 Previous Financial Year			FY 2022-23 Prior to Previous Financial Year		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees#	99.85%	66.32%	97.47%	86.30%	37.93%	82.58%	67.70%	35.34%	64.59%
Permanent Workers	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

**\*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.

As indicated in our Annual Report of FY 2023-24, in FY 2024-25, we are focused on optimizing our cost structure, leveraging AI capabilities, and focusing on our core business including creating a leaner organization structure. Higher turnover rate in FY 2024-25 is on account of conscious effort to create a leaner and more efficient organization.

Additionally, field sales teams comprising the majority of our confirmed employee base have a higher turnover ratio. Turnover rate of non-sales teams is 54.34% compared to turnover rate of 116.83% for field sales teams.

## 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	One 97 Communications India Limited	Subsidiary	100.00%	No
2	Mobiquest Mobile Technologies Private Limited ('MQ') #	Subsidiary	82.49%	No
3	Urja Money Private Limited ('Urja') ##	Subsidiary	83.34%	No
4	Little Internet Private Limited ('Little')	Subsidiary	62.53%	No
5	Paytm Cloud Technologies Limited (formerly known as Paytm Entertainment Limited) ('PCTL')	Subsidiary	100.00%	No
6	Paytm Money Limited	Subsidiary	100.00%	No
7	Paytm Services Private Limited	Subsidiary	100.00%	No
8	Paytm Payments Services Limited	Subsidiary	100.00%	No
9	Paytm Insurance Broking Private Limited	Subsidiary	100.00%	No
10	One97 Communications Nigeria Limited	Subsidiary	100.00%	No
11	One97 Communications FZ-LLC	Subsidiary	100.00%	No
12	One97 Communications Singapore Private Limited ('OCSPL') ###	Subsidiary	100.00%	No
13	One97 USA Inc.	Subsidiary	100.00%	No
14	One97 Communications Rwanda Private Limited (subsidiary of OCSPL)	Subsidiary	100.00%	No
15	One97 Communications Tanzania Private Limited (subsidiary of OCSPL)	Subsidiary	100.00%	No
16	One97 Communications Bangladesh Private Limited (subsidiary of OCSPL)	Subsidiary	70.00%	No
17	One97 Uganda Limited (subsidiary of OCSPL)	Subsidiary	100.00%	No
18	One97 Ivory Coast SA (subsidiary of OCSPL)	Subsidiary	100.00%	No
19	One97 Benin SA (subsidiary of OCSPL)	Subsidiary	100.00%	No
20	Paytm Labs Inc. (subsidiary of OCSPL)	Subsidiary	100.00%	No
21	One97 Communications Malaysia Sdn. Bhd. (subsidiary of OCSPL)	Subsidiary	100.00%	No
22	One Nine Seven Communication Nepal Private Limited (subsidiary of OCSPL)	Subsidiary	100.00%	No
23	One Nine Seven Digital Solutions Limited (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)
24	One Nine Seven Communications Saudi Arabia For Communication and Information Technology (subsidiary of OCSPL)	Subsidiary	100.00%	No
25	Fincollect Services Private Limited (subsidiary of Urja)	Subsidiary	83.34%	No
26	Nearbuy India Private Limited (subsidiary of Little)	Subsidiary	62.53%	No
27	Paytm Payments Bank Limited ####	Associate	49.00%	No
28	Paytm Insuretech Private Limited	Associate	32.45%	No
29	Paytm Emerging Tech Limited (formerly known as Paytm General Insurance Limited)	Associate	49.00%	No
30	Paytm Life Insurance Limited	Associate	49.00%	No
31	Paytm Financials Services Limited ('PFSL')	Associate	48.78%	No
32	Foster Payment Networks Private Limited (subsidiary of PFSL) ^	Associate	48.80%	No
33	Admirable Software Limited (subsidiary of PFSL)	Associate	48.78%	No
34	Infinity Transoft Solution Private Limited	Associate	26.19%	No
35	Eatgood Technologies Private Limited	Associate	23.24%	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	Seven Technology LLC (w.e.f. February 13, 2025)	Associate	25.00%	No
40	Dinie Correspondente Bancário e Meios de Pagamento Ltda (w.e.f. February 13, 2025) (subsidiary of Seven Technology LLC)	Associate	25.00%	No
41	Wasteland Entertainment Private Limited (till August 27, 2024)	Subsidiary	-	No
42	Orbgen Technologies Private Limited (till August 27, 2024)	Subsidiary	-	No
43	Xceed IT Solution Private Limited (subsidiary of MQ) (till February 21, 2025)	Subsidiary	-	No
44	Socomo Technologies Private Limited (till March 28, 2025)	Associate	-	No

**Notes:**

# Including 16.78% (March 31, 2024: 16.78%) held through Admirable Software Limited.

## Including 15.87% (March 31, 2024: 15.87%) held through Admirable Software Limited.

### Including 43.37% (March 31, 2024: 43.37%) held through One 97 Communications India Limited

#### Including 9.98% (March 31, 2024: 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 4.90% (March 31, 2024: 4.90%) held through Paytm Payments Bank Limited.

**VI. CSR Details**

**24. i. Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No):** Yes\*

**ii. Turnover (in ₹):** ₹55,047.59 millions

**iii. Net worth (in ₹):** ₹1,28,742.75 millions

\*However, the average net profit of the Company made during three (3) immediately preceding financial years is negative and hence, the Company was not statutorily required to spend any amount on CSR activities for the FY 2024-25.

## 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 2024-25 Current Financial Year			FY 2023-24 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	NA*	NA	NA	NA	NA	NA	NA
Investors (other than shareholders)	NA	NA	NA	NA	NA	NA	NA
Shareholders	Yes, <a href="https://paytm.com/document/ir/policies-and-guidelines/Investor-Grievance-Redressal-Policy.pdf">https://paytm.com/document/ir/policies-and-guidelines/Investor-Grievance-Redressal-Policy.pdf</a>	7	0	NA	5	0	NA
Employees and workers	Yes, <a href="https://paytm.com/document/ir/policies-and-guidelines/Anti_Bribery_Anti_Corruption_Policy.pdf">https://paytm.com/document/ir/policies-and-guidelines/Anti_Bribery_Anti_Corruption_Policy.pdf</a> <a href="https://paytm.com/document/ir/policies-and-guidelines/Whistle_Blower_Vigil_mechanism_policy.pdf">https://paytm.com/document/ir/policies-and-guidelines/Whistle_Blower_Vigil_mechanism_policy.pdf</a>	771	54	All 54 complaints have been resolved as of the date of the report.	1,032	49	All 49 complaints have been resolved.
Customers	Yes, <a href="https://paytm.com/Company/terms-and-conditions?Company=one97&amp;tab=grievance">https://paytm.com/Company/terms-and-conditions?Company=one97&amp;tab=grievance</a>	9,941	74	All 74 complaints have been resolved as of the date of the report.	13,852	53	All 53 complaints have been resolved.
Value Chain Partners	Yes, we have a centralised email ID to receive and track grievances received from our value chain partners. It forms part of terms and conditions of the purchase order.	NIL	NIL	NIL	NIL	NIL	NIL

\*NA Stands for 'Not Applicable'

## 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 Issues 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	Opportunity	<b>Opportunity:</b> Customer satisfaction is a key element of business. Taking into consideration the customer feedback enhances business operations and improves customer relationship with the Company. Additionally, this positively affects the financials of the Company and increases customer trust in the brand.	NA	Positive
2	Product Innovation	Opportunity	<b>Opportunity:</b> Product innovation is essential for maintaining customer satisfaction, staying competitive in the market, and driving continuous improvement. Investing in research and development initiatives allows Company to anticipate and meet evolving customer needs, leading to sustained business growth and market success.	NA	Positive
3	Regulatory Compliance	Opportunity/ Risk	<b>Opportunity:</b> Effective management of Regulatory compliance mitigates legal risks, enhances trust among stakeholders, and safeguards Company's reputation in the marketplace.  <b>Risk:</b> 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.	Timely identification of applicable laws and regulations, streamlines compliance processes, aids in monitoring and managing compliance activities, and provides a structured reporting process to uphold regulatory standards, thereby facilitating better decision-making.	Positive/ Negative
4	Corporate Governance and Ethics	Opportunity	<b>Opportunity:</b> Corporate Governance and Ethics are essential for reducing legal risks, building stakeholder trust, and safeguarding the reputation of the Company.	NA	Positive
5	Cybersecurity and Secure Transactions	Opportunity/ Risk	<b>Opportunity:</b> Cybersecurity and secure transactions present an opportunity for the Company to build trust and attract more customers. Strong security infrastructure also enables compliance with regulations and supports innovation in user-friendly financial services.  <b>Risk:</b> Unauthorized access to Company's information systems or failure to safeguard stakeholder's data will lead to data breaches and legal non-compliances. This may disrupt operations, loss of merchant's/customer's trust and lead to substantial regulatory penalties.	Enhance the cybersecurity strategy, framework, processes, policies, and controls to strengthen overall cyber resilience. The Company continues to invest in advanced technologies to address the evolving cyber threat landscape. The Company provides training and workshops focused on cybersecurity and secure transactions to its employees.	Positive/ Negative



S. No.	Material Issues 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 and Wellbeing	Opportunity	<b>Opportunity:</b> Ensuring a safe, healthy, and supportive work environment is vital for fostering employee well-being, promoting human rights, and facilitating effective recruitment, retention of talent, and productivity. Additionally, investing in employee development programs strengthen organizational capabilities and ensure a skilled and motivated workforce for sustainable growth.	NA	Positive
7	Management of Key Stakeholders	Opportunity	<b>Opportunity:</b> Effective management of key stakeholders is essential for seamless business operations, achieved by providing adequate disclosures, ensuring transparency and treating all stakeholders fairly. This is facilitated through various communication channels such as emails, one-on-one meetings and grievance resolution mechanisms.	NA	Positive
8	Financial Inclusion and Empowering SMEs	Opportunity	<b>Opportunity:</b> Effective financial inclusion initiatives are critical for promoting economic empowerment, expanding market access and fostering financial stability. By implementing strategies to enhance financial inclusion, Company address the needs of underserved communities, empower SME's, mitigate financial risks and contribute to sustainable economic development.	NA	Positive
9	Community Engagement	Opportunity	<b>Opportunity:</b> We encompass various initiatives aimed at positively impacting society. By engaging in community activities and supporting philanthropic endeavors, the Company builds trust with stakeholders, and contributes to long-term societal well-being.	NA	Positive
10	Climate Change	Risk	<b>Risk:</b> The evolving regulatory requirements, change in temperature, irregular precipitations, extreme weather events due to climate change and GHG emissions can act as risk factors for businesses.	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
11	Waste Management	Opportunity	<b>Opportunity:</b> 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 digital financial service Company, our innovative products promote paper reduction.	NA	Positive



## 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
<b>Policy and management processes</b>									
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	<a href="https://ir.paytm.com/policies-and-guidelines*">https://ir.paytm.com/policies-and-guidelines*</a>								
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 crafted with thorough consideration of industry best practices, regulatory mandates, and extensive consultation with pertinent stakeholders. Additionally, the Company adheres to the ISO 27001:2013 standards, ensuring compliance with information security protocols.								
5. Specific commitments, goals and targets set by the entity with defined timelines, if any.	Annual refresher training achieved at 100% on compliance & also providing improved learning and training experiences year on year to build capabilities across different employee groups.								
6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.	100% completion of mandatory compliance training.								

Disclosure Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
<b>Governance, leadership and oversight</b>									
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)	<p>At Paytm, we are dedicated to achieving sustainable growth by providing services that cater to the ever-changing needs of our customers while minimizing environmental footprint. We hold a strong belief that sustainability and profitability are not mutually exclusive, but rather complementary aspects of a successful business. Our business strategy is designed to incorporate sustainability into our multi-stakeholder model, ensuring that we protect the planet, prioritize people, and uphold ethical business practices by integrating ESG considerations into our operations.</p> <p>Through our innovative Soundbox technology and digital financial services, we actively contribute to environmental sustainability by reducing paper consumption. Additionally, we are committed to creating a positive social impact through Paytm Foundation's educational programs, by providing scholarships to underprivileged students and enhancing learning in the Anganwadi centers. Our employees also play an active role in promoting social responsibility by participating in various volunteering activities, such as Financial Literacy initiatives that empower disadvantaged groups with essential knowledge about financial systems.</p> <p>We maintain a strong governance framework, with robust corporate governance policies in place to ensure that ethical business practices are consistently followed throughout the Company. Our CSR Committee, comprising esteemed Board Members, oversees the ESG strategies and initiatives of the Company, ensuring that we remain accountable to our stakeholders.</p> <p>We recognize that sustainability is an ongoing journey and that each of us has a role to play in ensuring that our growth is both sustainable and inclusive. We are committed to continuous improvement and will remain proactive in addressing sustainability challenges and driving positive change across our entire ecosystem. We believe that by working together, we can create a future where business success and sustainability are synonymous, benefiting both present and future generations.</p>								
8. Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).	Mr. Madhur Deora, Executive Director, President and Group Chief Financial Officer.								
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.	Yes, the CSR committee is responsible for overseeing the ESG related initiatives, while the ESG Committee focuses on implementing and monitoring these initiatives.								

**\*Note:** Relevant Policies are hosted on our website. However, policies relevant to Principle 2 and Principle 6 are not available in public domain but as a responsible Company Paytm encourages its employees to follow sustainable practices.

## 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	Q	A
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	Q	A

	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, we have undertaken a Reasonable Assurance on BRSR Core KPI's and Limited Assurance on Essential indicators of Principle 1-9 with TUV India Private Limited (TUVI). 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)	NA 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)									



## 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:

Segment	Total number of training and awareness programmes held^	Topics / principles covered under the training and its impact	%age of persons in respective category covered by awareness programmes
Board of Directors^	7	During the year, the Board of Directors underwent training on: Code of Conduct policy relevant to directors, Conflict of Interest, Confidentiality, Anti-Bribery and Corruption (ABAC), Insider Trading, ESG and other policies as available on website.	100%
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 and Insider Trading.	100%
Employees other than BoD and KMPs^	6	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 and Prevention of Sexual Harassment (POSH).	100%*
Workers	Not Applicable		

**\*Note:** The 100% completion status is based on employee records as of 28<sup>th</sup> February 2025. It is assumed that this completion rate will remain consistent for March joiners, considering they have an additional 30 to 60 days to complete their training.

^Total number of training and awareness programmes held is the count of topics covered at each level.

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	P1-P9	Office of Collector of Stamps	47.13 Lakhs	The Company has received orders dated 22 <sup>nd</sup> July 2024, 23 <sup>rd</sup> July 2024 and 13 <sup>th</sup> August 2024, respectively, from the Office of Collector of Stamps, New Delhi imposing penalties aggregating to ₹47.13 lakhs, in respect of non-payment of stamp duty on allotment of equity shares in the previous years. The Company had submitted applications for payment of stamp duty at relevant time with the Office of Collector of Stamps, New Delhi, although there were delays of few days in submission of some applications. The Company has paid the penalty amount and the matter has been closed during the FY 2024-25.	No
Settlement	P1-P9	SEBI	3.32 Crores	The Securities and Exchange Board of India (SEBI) has issued a Settlement Order dated 17 <sup>th</sup> January 2025, in respect of the Settlement Application filed by certain past and present Directors and a past officer of the Company ("Applicants") w.r.t. alleged violations of Regulations 4(2) and 6(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 and Regulations 245(1) and (2) of the SEBI (Issue of Capital and Disclosure Requirements) Regulations 2018, disposing of adjudication proceedings related to One 97 Communications Limited ("Company"). The Settlement, carried out under SEBI (Settlement Proceedings) Regulations 2018, was completed with payment of a total amount of ₹3.32 crore by the Applicants. No impact on financial, operations or other activities of the Company as the order has been passed on the Applicants as stated above.	No
Compounding fee	P1-P9	Reserve Bank of India (RBI)	3.69 Lakhs	The Reserve Bank of India (RBI) had issued an order dated 17 <sup>th</sup> January 2025, for compounding contraventions of certain provisions of the Foreign Exchange Management Act, 1999 and the regulations issued thereunder. The Company had filed an application to RBI for compounding of (i) delay in reporting of remittance received, (ii) delay in submission of form FCGPR, (iii) issue of shares prior to receipt of remittance and (iv) delay in refund of excess remittance amount in terms of Para 9(1 )(A), Para 9(1 )(B), and Para 8 of Schedule 1 respectively to Foreign Exchange Management (Transfer or Issue of Security by a Person Resident Outside India) Regulations, 2000 notified vide Notification No. FEMA 20/ 2000-RB dated 3 <sup>rd</sup> May 2025, hereinafter referred to as FEMA 20/ 2000-RB), as then applicable.  The said compounding was concluded after payment of an amount of ₹3,68,864 (Rupees three lakh sixty eight thousand eight hundred sixty four only) to RBI which was acknowledged by RBI vide certificate dated 3 <sup>rd</sup> February 2025.	No

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	P1-P9	NIL	No Case	NIL
Punishment	P1-P9	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
NIL	NA

**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 an Anti-Bribery and Anti-Corruption Policy. The Company is committed to upholding the highest professional and ethical standards in all aspects of business operations. The Company has a zero tolerance towards bribery and corruption in any form, whether directly or indirectly through a third party. Furthermore, the Company is committed to upholding all such laws and regulations, as may be applicable, in every jurisdiction where it has its operations.

Web Link - <https://paytm.com/Company/terms-and-conditions?Company=one97&tab=anti-bribery-anti-corruption>

**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 2024-25	FY 2023-24
	Current Financial Year	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 2024-25		FY 2023-24	
	Current Financial Year		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:**

Particulars	FY 2024-25	FY 2023-24
	Current Financial Year	Previous Financial Year
Number of days of accounts payables	62.36	46.29

## 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:

Parameter	Metrics	FY 2024-25 Current Financial Year	FY 2023-24 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	0.01%
	b. Number of dealers / distributors to whom sales are made	NA	386
	c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors	NA	15.69%
Share of RPTs in	a. Purchases (Purchases with related parties / Total Purchases)	0.04%	0.18%
	b. Sales (Sales to related parties / Total Sales)	2.10%	19.44%
	c. Loans & advances (Loans & advances given to related parties / Total loans & advances)	84.33%	79.02%
	d. Investments (Investments in related parties / Total Investments made)	21.82%	29.43%

## 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
1	<b>Environment:</b> Energy & Greenhouse Gas Management, Water and Waste Management, Air Pollution, Resource usage and Efficiency. <b>Social:</b> Human Rights, Harassment & Abuse, Compensation & Remuneration, Discrimination & vulnerable Groups, Freedom of Association & Collective Bargaining, Health and Safety. <b>Governance:</b> Conflict of Interest, Cyber Security & Data Privacy, Fair Business Practices, International Trade, Anti Bribery & Anti Corruption, Insider trading, Quality and product responsibility, compliance with Law.	81.25%*

**\*Note:** Training program was conducted for the value chain partners which includes supplier/vendors comprising 2% or more of the Company purchases (by value).



**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, the Company has established a Code of Conduct for its Board of Directors and Senior Management Team. This code mandates that all Directors act in the Company's best interests and ensure that any personal or business associations do not create conflicts of interest with the Company's operations. If conflicts arise, Directors are required to promptly report them and seek necessary approvals as per legal requirements and Company policies.

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

[https://paytm.com/document/ir/policies-and-guidelines/Code\\_of\\_Conduct\\_for\\_Board\\_and\\_Senior\\_Management\\_Version\\_4.0](https://paytm.com/document/ir/policies-and-guidelines/Code_of_Conduct_for_Board_and_Senior_Management_Version_4.0)

## 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.**

Particulars	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year	Details of improvements in environmental social impacts
R&D	0.00%	0.19%	
Capex	78.20%	69.91%	Reduced paper usage, transitioning to software solutions and enhancing data management through adoption of Electronic Data Capture (EDC) devices, Soundbox etc.

**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?**

We have 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**

Given the nature of its business, the Company has limited scope to use recycled material as processed inputs. All waste that is generated on our premises is disposed-off to Government authorized waste management vendors who have sorting/processing units of their own.

**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, EPR E-waste and Battery Waste Management Rules are applicable to the Company, and the waste collection and disposal plan is in line with the EPR plan submitted to Central Pollution Control Board (CPCB).

### 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.
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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
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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 reused input material to total material	
	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
NA	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 2024-25 Current Financial Year			FY 2023-24 Previous Financial Year		
	Re-Used	Recycled	Safely Disposed	Re-Used	Recycled	Safely Disposed
Plastics (including packaging)	NA	NA	NA	NA	NA	NA
E-waste	1,157.73 MT*	226.49 MT	NA	1,177.64 MT	227.35 MT	NA
Hazardous waste	NA	NA	NA	NA	NA	NA
Other waste	NA	NA	NA	NA	NA	NA

**\*Note:** To calculate the amount of reused E-waste, we used the total number of Soundboxes (35,52,908) and EDC's (2,47,856) and multiplied the respective average weights of the different variations of Soundboxes (304.6 grams) and EDCs (304.65 grams), added the totals and converted the number to metric tonnes.

## 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

**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*	
		Number (B)	% (B / A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
Permanent employees											
Male	13,619	13,619	100%	13,619	100%	NIL	NIL	13,619	100%	NA	NA
Female	1,037	1,037	100%	1,037	100%	1,037	100%	NIL	NIL	1,037	100%
Total	14,656	14,656	100%	14,656	100%	1,037	7.08%	13,619	92.92%	1,037	7.08%
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

**\*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). These are special cases and require approval of the Head of the Department. However, no such claim has been availed yet.

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	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
Other than Permanent workers											
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

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

Particulars	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Cost incurred on wellbeing measures as a % of total revenue of the Company	0.43%	0.22%

**Note:** The above accounts for cost incurred on insurances, day care facilities, maternity 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 ₹9.04 Crores in FY 2024-25 which is over and above the percentages reported above.

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

Benefits	FY 2024-25 Current Financial Year			FY 2023-24 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	99.88% #	NIL	Yes	99.92%*	NIL	Yes
Gratuity	100%	NIL	NA	100%	NIL	NA
ESI	15.60%##	NIL	Yes	49.73%**	NIL	Yes
Others – please specify	NIL	NIL	NIL	NIL	NIL	NIL

**For FY 2024 - 25:**

#18 out of 14,656 Employees have voluntarily opted out from PF

## All 2,286 employees eligible for cover under ESIC were covered

**For FY 2023 - 24:**

\* 22 out of 28,107 Employees have not opted for PF

\*\*All 13,977 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, we have wheelchair accessibility in our corporate office and major regional offices.

**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, the Company has adopted an Equal Employment Opportunity Policy for Persons with Disabilities in compliance with the Rights of Persons with Disabilities Act, 2016, and the Rights of Persons with Disabilities Rules, 2017 ("Act"). This policy is designed to empower, protect, and promote the interests of employees with disabilities within the organization. It underscores our commitment to creating an inclusive workplace where employees with disabilities are treated with dignity and respect.

The policy ensures equal opportunities in all aspects of employment for individuals with disabilities, fostering a non-discriminatory and inclusive environment that supports their professional development, including those who may acquire disabilities during their employment. Additionally, the policy outlines provisions for providing necessary facilities, amenities, and infrastructure—both physical and digital—to meet the needs of employees with disabilities, enabling them to perform effectively within the Company.

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	97.56%	53.20%	NA	
Female	97.92%	50.85%		
Total	97.62%	52.87%		

**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
Other than Permanent Employees	NA

**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.

We maintain a POSH Policy and an Internal Complaints Committee (ICC) 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.

**Employee Grievance Policy:**

<https://paytm.com/document/ir/policies-and-guidelines/Employee-Grievance-Redressal-Policy.pdf>

**Whistle Blower Mechanism:**

[https://paytm.com/document/ir/policies-and-guidelines/Whistle\\_Blower\\_Vigil\\_mechanism\\_policy.pdf](https://paytm.com/document/ir/policies-and-guidelines/Whistle_Blower_Vigil_mechanism_policy.pdf)

**POSH Policy:**

[https://paytm.com/document/ir/policies-and-guidelines/POSH\\_Policy.pdf](https://paytm.com/document/ir/policies-and-guidelines/POSH_Policy.pdf)

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

Category	FY 2024-25 Current Financial Year			FY 2023-24 Previous Financial Year		
	Total employees / workers in respective category (A)	No. of employees / workers respective category, who are part association(s) 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)
<b>Total Permanent Employees</b>						
Male	13,619	NIL	NIL	26,504	NIL	NIL
Female	1,037	NIL	NIL	1,603	NIL	NIL
<b>Total Permanent Workers</b>						
Male	NIL					
Female	NIL					

**8. Details of training given to employees and workers:**

Category	FY 2024-25 Current Financial Year					FY 2023-24 Previous Financial Year				
	Total (A)	On Health and safety measures#		On Skill upgradation*		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	13,619	498	3.66%	9,580	70.34%	26,504	906	3.42%	10,271	38.75%
Female	1,037	85	8.20%	652	62.87%	1,603	297	18.53%	972	60.64%
Total	14,656	583	3.98%	10,232	69.81%	28,107	1,203	4.28%	11,243	40.00%
Workers										
Male										
Female	NIL									
Total										

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

**\*Note:** The headcount (HC) data pertains to all individuals (active & in-active) who were covered/ upskilled throughout the year i.e. until 31<sup>st</sup> March 2025.

**9. Details of performance and career development reviews of employees and worker:**

Category	FY 2024-25 Current Financial Year			FY 2023-24 Previous Financial Year		
	Total (A)	No. (B)	% (B / A)	Total (C)	No.(D)	% (D / C)
<b>Employees</b>						
Male	13,619	13,619	100%	26,504	26,504	100%
Female	1,037	1,037	100%	1,603	1,603	100%
<b>Total*</b>	<b>14,656</b>	<b>14,656</b>	<b>100%</b>	<b>28,107</b>	<b>28,107</b>	<b>100%</b>
<b>Workers</b>						
Male	NIL					
Female	NIL					
<b>Total</b>	NIL					

**\*Note:** 100% of eligible 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 of such a system?**

Yes, there are minimal occupational health and safety risks associated with our business operations. The following Health and Safety measures have been implemented for employee safety and wellbeing.

- a) The Company has ensured physical and electronic security including man-guarding, installation of Access Control Systems, CCTV monitoring, and fire-fighting systems at all our offices.
- b) The admin team conducts emergency/disaster management drills as per National Building Code, including fire-fighting drills at regular intervals in Regional and Corporate offices.
- c) Central heating, ventilation, and cooling systems with air filters are installed in the offices and there is a provision of fresh air in all our offices.
- d) Centralized helpline number for employees to reach out to the administration department for any work-related hazards.
- e) The Company has tied up with nearby hospitals for emergency medical support.
- f) Safe drinking water, hygienic and clean offices, and food safety are provided across all our offices.
- g) The Company's admin team ensures periodic checks, maintenance, and certification of all electromechanical equipment including Lifts, HVAC (heat, ventilation and air conditioning), fire systems, DG (Diesel Generator) sets, UPS (Uninterruptible Power Supply).
- h) Medical room facility available in Noida & Bangalore office for employees having medical issues.
- i) Employee Health camps are regularly organised by the HR team.
- j) Awareness sessions conducted on nutrition and health for employees.
- k) CPR training given to Emergency Response Team (ERT) Members of the Company.
- l) Virtual Trainings are conducted on Earthquake safety on a quarterly basis for fleet offices.

**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 undertakes various processes to identify and assess work-related hazards, for both routine and non-routine activities. These measures are designed to effectively mitigate risks. The key actions taken include:

- Comprehensive security checks are carried out, covering physical security measures such as manned guarding, access control systems, CCTV surveillance, and the upkeep of fire-fighting systems.
- A well-established Disaster Management Plan is in place, with the Company conducting annual emergency mock drills.
- Regular water testing is conducted to monitor Total Dissolved Solids (TDS) levels.
- Heating, Ventilation, and Air Conditioning (HVAC) systems are regularly inspected to ensure optimal functioning.
- Building safety is ensured through periodic maintenance of electromechanical systems, including lifts, UPS, and Diesel Generators.
- Office hygiene and cleanliness are prioritized to maintain a safe working environment.
- Security guards at all offices are trained in the operation of fire safety equipment.
- Regular safety advisories are issued, addressing various aspects like weather alerts, fire safety, and security precautions.

**c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Yes/No).**

Yes, a resilient process is in place for employees to report work-related hazards and to remove themselves from such risks. We have issued a centralized Helpline number and email for all employees to report any risk they come across. These Helpline numbers are displayed in all our offices. Additionally, Emergency Response Team (ERT) is located at corporate and major regional offices to provide immediate support when needed.

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

We provide health insurance coverage for our employees, making certain they have access to medical services covered under the policy. Additionally, we arrange health check-up camps periodically at our offices across India. Furthermore, we host webinars frequently featuring doctors from notable hospitals to enhance health related awareness among our employees.

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

Safety Incident/Number	Category	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	NIL	NIL
	Workers	NIL	NIL
Total recordable work-related injuries	Employees	NIL	NIL
	Workers	NIL	NIL
No. of fatalities	Employees	NIL	NIL
	Workers	NIL	NIL
High consequence work-related injury or ill-health (excluding fatalities)	Employees	NIL	NIL
	Workers	NIL	NIL

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

The Company has implemented a set of actions to ensure a safe and healthy workplace environment:

- Physical and electronic security measures, such as man guarding, Access Control System, CCTV monitoring and Fire-fighting systems.
- Fire and burglar alarms with fire and smoke sensors are installed for early fire detection.
- Fire extinguishers are available in all offices for immediate fire-fighting, and regular maintenance of the equipment is ensured.
- Comprehensive training and awareness about best practices and fire-fighting are provided to guards and employees. The Company conducts regular mock drills, fire drills, and physical verification of fire safety equipment, along with evacuation plans.
- Auto fire suppressants are installed in data/server rooms in selected offices.
- Earthing pits and lightning conductors are installed in buildings to discharge lightning safely.
- Important contact numbers for the nearest fire brigade, police station, ambulance, etc., are displayed at buildings/offices.
- Public address systems are installed at office premises to facilitate communication during emergencies.
- Emergency Evacuation plans, floor plans, and exit paths are displayed on each floor.
- CCTV cameras are used for detecting and recording all activities, including sabotage, if any.
- First-Aid Boxes are available in all offices, and regular first-aid training is provided to employees and security guards.



- Employees' dependents are enrolled under Mediclaim to provide medical coverage.
- Free-of-cost shuttles are provided for Noida office employees to commute from the nearest metro station to the office, promoting convenience and reducing transportation risks.
- The Company ensures cleanliness and hygiene in the dining area to maintain a healthy environment.
- The Company has a dedicated medical room at Noida and Bangalore offices.
- Sanitary Product Disposal Machines have been set up at corporate and major regional offices.

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

	FY 2024-25 Current Financial Year			FY 2023-24 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	NIL	NIL	NIL	NIL
Health & Safety	NIL	NIL	NIL	27	0	These incidents include employees experiencing health issues during office hours, logistical complaints within the office premises and other such instances.

### 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. During FY 2024-25, 100% of the regional offices (excluding 2 co-working spaces) were accessed using a comprehensive health and safety checklist.

### 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.

There were no corrective actions undertaken during FY 2024-25, as there were no significant risks/concerns arising from the assessment.

## 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, we have GTL (Group Term Life insurance coverage) for all the permanent employees and assistance for PF and Gratuity settlement is also extended to the family on the priority basis. Also, any unvested ESOPs of an active employee vest immediately upon the event of death of such employee.

**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 adequate mechanisms to ensure that requisite statutory dues, as applicable to the transactions of the Company with its value chain partners, are deducted and deposited in accordance with the applicable regulations. The Company also collects necessary certificates and proofs from its contractors with respect to payment of statutory dues like PF, ESIC, etc. relating to contractual employees and workers.

The Company expects its value chain partners to follow ethical practices in all its business transactions and uphold standards of fair business practices. We have covered these aspects in our agreement with value chain partners.

**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 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Employees	NIL	NIL	NIL	NIL
Workers	NIL	NIL	NIL	NIL

**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. While we don't offer standalone transition assistance programs, we recognize the wealth of experience retiring employees bring. We often enlist them as external consultants, leveraging their invaluable knowledge for specific projects as needed. Additionally, eligible employees receive gratuity upon retirement.

**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 Working Conditions	81.25%* by the Company.

**\*Note:** ESG Assessment for value chain partners were conducted for the suppliers/vendors comprising 2% or more of the listed Company's (OCL's) purchases (by value).

**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 actively engages with different stakeholders to gain an understanding of their needs and expectations. We have established a comprehensive 'Stakeholder Engagement Policy' to enhance our stakeholder engagement and deepen trust. This policy outlines the purpose, scope, engagement plan, and communication details aimed at improving transparency and accountability. Our process for stakeholder identification, prioritization, and engagement aligns closely with our policy, ensuring consistency and effectiveness. The stakeholders have been identified based on:

- Those who are directly or indirectly related to our activities, products or services like employees, merchants, vendors and customers.
- Those for whom the Company has legal, commercial, operational, or ethical/moral responsibilities like government bodies & regulatory authorities; and
- Those who can influence or have impact on our decision-making like board/investors.
- Those who are directly or indirectly responsible for creating a sustained brand value like media and partners.

Furthermore, through our ESG efforts surrounding the process of capturing stakeholder voice related to material topic identification, we endeavor to continue engaging with our stakeholders in the future. This process serves to realign our actions with our overarching business. By actively involving stakeholders, gathering their viewpoints, and developing our materiality matrix, we plan to continue developing business strategies, while keeping sustainability at the forefront of our decision-making processes.

#### 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	<ul style="list-style-type: none"> <li>• Learning Management System &amp; Emails</li> </ul>	As required	<ul style="list-style-type: none"> <li>• Awareness on critical topics is conducted to mitigate risk &amp; build awareness</li> </ul>
		<ul style="list-style-type: none"> <li>• Emails</li> </ul>	Monthly/As required	<ul style="list-style-type: none"> <li>• Support with avenues for self development at work to excel in their roles</li> </ul>
		<ul style="list-style-type: none"> <li>• Newsletter</li> </ul>	Monthly/ As required	<ul style="list-style-type: none"> <li>• Organizational updates</li> </ul>
		<ul style="list-style-type: none"> <li>• Meeting with Line managers</li> </ul>	Half yearly	<ul style="list-style-type: none"> <li>• Employee recognition and engagement activities</li> </ul>
		<ul style="list-style-type: none"> <li>• Video conferencing or Physical meeting</li> </ul>	Quarterly/As required	<ul style="list-style-type: none"> <li>• Employee performance review and career development</li> </ul>
Customers	No	<ul style="list-style-type: none"> <li>• Customer Help Desk through Paytm App with a bot channel</li> </ul>	As required	<ul style="list-style-type: none"> <li>• Town Hall</li> </ul>
				<ul style="list-style-type: none"> <li>• To address customer queries, requests, concerns and service related issues in a timely manner</li> </ul>

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
Merchants	No	<ul style="list-style-type: none"> <li>Merchant Help Desk through Paytm For Business app with Bot, IVR channel</li> </ul>	As required	<ul style="list-style-type: none"> <li>Resolving queries</li> <li>Support on the queries related to Soundboxes and POS devices</li> </ul>
Vendors/ suppliers	No	<ul style="list-style-type: none"> <li>Emails</li> <li>Calls/Physical meetings</li> </ul>	Everyday	<ul style="list-style-type: none"> <li>Obtaining quotation</li> <li>Contract negotiation and exploring new scope of work</li> <li>Signing and renewal of contracts, terms and agreement</li> <li>Resolving queries and assessing performance</li> </ul>
Partners	No	<ul style="list-style-type: none"> <li>Emails</li> </ul>	Fortnightly	<ul style="list-style-type: none"> <li>Resolving queries and operational challenges</li> </ul>
Shareholders/ investors	No	<ul style="list-style-type: none"> <li>Press releases and stock exchange filings</li> <li>Quarterly earnings calls</li> <li>Annual shareholder meetings</li> <li>Investor conferences and meetings</li> </ul>	Quarterly or as and when applicable, whichever is earlier	<ul style="list-style-type: none"> <li>These are aimed at providing relevant information as well as understanding stakeholders' perspectives on Company's performance and strategy</li> <li>To update them with the recent market development</li> </ul>
Government bodies	No	<ul style="list-style-type: none"> <li>Face to face meeting</li> <li>Presentations</li> </ul>	Monthly	<ul style="list-style-type: none"> <li>Meetings and discussion with relevant Ministries, Departments, Committees constituted by the Government on existing and proposed regulations / orders / directives and advisories undertaken as and when required</li> </ul>
Media	No	<ul style="list-style-type: none"> <li>Emails</li> </ul>	Monthly	<ul style="list-style-type: none"> <li>Sustained brand narrative communication through press releases, social posts and SE filings</li> <li>The announcements include partnerships, product launches, business updates and more</li> <li>This also includes engaging with the media in industry stories, or resolving queries with spokesperson statements</li> </ul>
Board Members	No	<ul style="list-style-type: none"> <li>Board Meetings</li> <li>Emails</li> </ul>	Quarterly or as and when applicable, whichever is earlier	<ul style="list-style-type: none"> <li>Business Updates.</li> <li>Updates on Material events/information</li> <li>Regulatory/Statutory approvals</li> </ul>

## 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.

We identify, prioritize, and engage with our stakeholders strategically, in line with our comprehensive Stakeholder Engagement Policy. This policy ensures transparency and accountability by clearly defining our engagement purpose, scope, plan, and communication channels.

Our teams maintain continuous engagement and regular interactions with stakeholders, gathering valuable feedback and information. This input is discussed with senior management of respective departments and reported to the ESG Committee for review and action.

Operating under the guidance of the CSR Committee, ESG Committee plays a crucial role in upholding our ESG standards. This committee:

- Guides and oversees the Company's ESG progress.
- Approves, reviews, and ratifies ESG initiatives.
- Monitors performance and oversees the execution of ESG initiatives.

The ESG Committee periodically updates the initiatives to the CSR Committee and Board. This structured approach ensures effective ESG governance and integration within the Company's 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 inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

Yes, in FY 2024-25, guided by stakeholder consultations, we have begun implementing new policies like ESG policy developed in alignment with National Guidelines for Responsible Business Conduct (NGRBC) principles. Furthermore, we have an ESG committee which oversees the ESG strategy and progress. We rely on internal & external stakeholder consultation for the identification and management of environmental, social & governance topics.

The insights gained from internal consultation have helped us craft our ESG strategy. As per the strategy, our ESG activities and initiatives across various departments are being implemented.

The Company has taken various Initiatives in consultation with stakeholders -

- ESG Strategy has been established by the Company dividing action points into short, medium and long term.
- To increase awareness amongst employees, the Company has circulated mailers and flyers on ESG topics.
- The Company has provided training to the board of directors on ESG.
- To increase awareness of ESG among the vendors, ESG awareness sessions were conducted by external trainers.

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

We are committed to giving back to society and actively engaging with various nonprofit organizations across India to address the needs of vulnerable and marginalized communities. Guided by our CSR policy, which defines the processes for project execution, fund utilization, and monitoring, we continually strive to support disadvantaged groups through meaningful initiatives. With the guidance of the Board governed Corporate Social Responsibility (CSR) committee, the Company remains committed in helping marginalised communities through initiatives as mentioned below:

- **Scholarship Program with Scaler Foundation:** Providing scholarships to 24 underprivileged engineering students in Bengaluru to support their higher education.
- **Educational Kit Distribution to Anganwadi Centers:** Distributed educational kits to 20 Anganwadi centers in Gautam Buddha Nagar, Uttar Pradesh. It helped in recognizing the importance of early childhood development.

Additionally, as part of our employee volunteering efforts, we have positively impacted 1,675 beneficiaries, including underprivileged children, homeless elderly individuals, and women. Our volunteers have contributed to various sessions on soft skills, digital literacy, basic education, and fun activities throughout the year. We have engaged our employees through various volunteering activities and have collectively dedicated 1,688 hours of service.

These initiatives reflect our ongoing commitment to make a positive and lasting difference in society through strategic partnerships and active participation.

## 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 2024-25 Current Financial Year			FY 2023-24 Previous Financial Year		
	Total (A)	No. of employees / workers covered (B)	% (B / A)	Total (C)	No. of employees workers covered (D)	% (D / C)
<b>Employees</b>						
Permanent	14,656	14,656	100%#	28,107	28,107	100%
Other than permanent	NA	NA	NA	NA	NA	NA
<b>Total Employees</b>	<b>14,656</b>	<b>14,656</b>	<b>100%#</b>	<b>28,107</b>	<b>28,107</b>	<b>100%</b>
<b>Workers</b>						
Permanent	NIL	NIL	NIL	NIL	NIL	NIL
Other than permanent	NIL	NIL	NIL	NIL	NIL	NIL
<b>Total Workers</b>	<b>NIL</b>	<b>NIL</b>	<b>NIL</b>	<b>NIL</b>	<b>NIL</b>	<b>NIL</b>

**#Note:** Topics on human rights are part of Company's Code of Conduct (CoC). All the employees are trained on Company's CoC which is a mandatory compliance training. The 100% completion status is based on employee records as of 28<sup>th</sup> February 2025. It is assumed that this completion rate will remain consistent for March joiners, considering they have an additional 30 to 60 days to complete their mandatory compliance training within the stipulated timelines.

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

Category	FY 2024-25 Current Financial Year					FY 2023-24 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										
Male	13,619	NIL	NIL	13,619	100%	26,504	NIL	NIL	26,504	100%
Female	1,037	NIL	NIL	1,037	100%	1,603	NIL	NIL	1,603	100%
Other than Permanent										
Male	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Female	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

Category	FY 2024-25 Current Financial Year					FY 2023-24 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)
Workers										
Permanent										
Male	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Female	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Other than Permanent										
Male	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Female	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL

### 3. Details of remuneration/ salary/ wages

#### a. Median remuneration/ wages

Category	Male		Female	
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoD)	7	0.61	1	0.64
Key Managerial Personnel	3	4.0	NIL	NIL
Employees other than BoD and KMP	13,616	0.06	1,037	0.11
Workers	NA			

#### Note:

1. This is as per the CTC of employees who were active as on 31<sup>st</sup> March 2025.
2. Figures are in Rs. Crores

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

Particulars	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Gross wages paid to females as a % of total wages*	10.54%	10.33%

\*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, we have multiple focal points and committees that collectively serve towards addressing human rights issues arising out of our operations. These include the Internal Complaints Committee (ICC) for sexual harassment matters, a Grievance Escalation Matrix for general workplace related concerns, and an independent Risk and Vigilance team.

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

We have instituted robust internal mechanisms to redress grievances related to human rights, spanning across employee experience, ethics, safety, and legal compliance. These include:

- **Employee Grievance Redressal Policy:** A structured 3-level framework enabling employees to raise issues to the reporting manager first, followed by 2 levels of escalation and an escalation helpline. If the concern is related to the reporting manager, then the employee can directly raise complaints to the second level.
- **Whistleblower/Vigil Mechanism:** The Company has a dedicated helpline number, a web portal and a mobile application to report unethical behavior or any other matter. Further, protected disclosures can also be made to the General Counsel via a postal mail or an email to the General Counsel. If the disclosure is against the General Counsel, then it can be addressed to the Chairman of the Audit Committee. If a disclosure is against the Chairman of the Audit Committee, it can be addressed to the Board of Directors.



- **POSH Policy & Internal Complaints Committee (ICC):** An aggrieved woman can submit a complaint regarding sexual harassment at workplace to the ICC. Post this an enquiry process is followed and ICC submits its report containing the findings and recommendations to the Complainant and Respondent. Once the two parties are in agreement with the findings report, it shall be submitted to the HR. The HR takes action within a fixed timeline and there is a process for appeals as well. The entire mechanism is in line with the POSH Act 2013.
- **Risk and Vigilance Team:** An independent Risk and Vigilance team is in place to whom employees can raise concerns which are investigated and acted upon by a Disciplinary Committee in line with the Consequence Management Policy.

All these mechanisms are underpinned by principles of confidentiality, non-retaliation, and timely redressal — reinforcing the Company's commitment to ethical and human rights-compliant practices.

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

Particulars	FY 2024-25 Current Financial Year			FY 2023-24 Previous Financial Year		
	Filed during the year	Pending resolution at the end of the year	Remarks	Filed during the year	Pending resolution at the end of the year	Remarks
Sexual Harassment	2	0	NIL	0	0	NA
Discrimination at workplace	148	3	All 3 complaints have been resolved as on date of the report.	16	2	All 2 complaints have been resolved
Child Labour	NIL	NIL	NIL	NIL	NIL	NIL
Forced labor/ Involuntary labor	NIL	NIL	NIL	NIL	NIL	NIL
Wages	55	2	All 2 complaints are resolved as of date of the report.	12	3	All 3 complaints have been resolved
Other human rights related issues	0	0	NA	41	7	All 7 complaints have been resolved

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

Particulars	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH)	2	0
Complaints on POSH as a % of female employees / workers	0.15%	0%
Complaints on POSH upheld	0	0

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

We have adopted policies which reinforce to the stakeholders, who raise complaints on a concrete and reasonable belief about a violation, that they will not be subjected to any kind of retaliation such as discrimination, reprisal, harassment, victimization etc. irrespective of the concern being ultimately substantiated.

The Company has zero tolerance for any kind of harassment and discrimination. Our Human Resource policies and Code of Conduct promote diversity and equality in the workplace, as well as compliance with all local labour laws, while encouraging the adoption of international best practices.

Employee policies and practices are administered in a manner consistent with applicable laws and other provisions of this Code, respect for the right to privacy and the right to be heard, and that in all matters equal opportunity is provided to those eligible and decisions are based on merit.



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

Yes, our Code of Conduct is applicable to all our employees, employees of service providers or vendors, employees of business partners, consultants, retainers, trainees, or any individual engaged for providing services to the Company who have to comply with all applicable laws, including labour laws which forms a part of our vendor/service provider contracts and business requirements.

**10. Assessments for the year:**

Particulars	% of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	The Company internally monitors compliance with all relevant laws and policies pertaining to these issues at 100% of its offices.
Forced/involuntary labour	
Sexual harassment	
Discrimination at workplace	
Wages	
Others – please specify	

**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 2024-25 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.**

Not applicable

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

A periodic employee satisfaction survey is rolled out to employees to collect feedback on various topics, including human rights. This is carried out using Amara tool which encompasses topics like learning & development, Diversity, Equity & Inclusion (DEI), Ethics and working conditions.

**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, we have wheelchair accessibility in our Corporate office and major regional offices.

**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	81.25% by the Company
Discrimination at workplace	
Child Labour	
Forced Labour/Involuntary Labour	
Wages	
Others	

**Note:** ESG Assessment for value chain partners were conducted for the suppliers/vendors comprising 2% or more of the listed Company's (OCL's) purchases (by value).

**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

## Essential Indicators

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

Parameter	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
<b>From renewable sources</b>		
Total electricity consumption (A)	NA	NA
Total fuel consumption (B)	NA	NA
Energy consumption through other sources (C)	NA	NA
<b>Total energy consumed from renewable sources (A+B+C)</b>	<b>NA</b>	<b>NA</b>
<b>For non - renewable resources (in GJ)</b>		
Total electricity consumption (D)	8,993.70	12,706.95
Total fuel consumption (E)	1,508.55	1,177.39
Energy consumption through other sources (F)	NA	NA
<b>Total energy consumed from nonrenewable sources (D+E+F)</b>	<b>10,502.25</b>	<b>13,884.34</b>
<b>Total energy consumed (A+B+C+D+E+F)</b>	<b>10,502.25</b>	<b>13,884.34</b>
<b>Energy intensity per rupee of turnover</b> (Total energy consumed / Revenue from operations)	0.00000019078 GJ/₹	0.0000001812 GJ/₹
<b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed / Revenue from operations adjusted for PPP)	0.000000009234 GJ/\$ PPP	0.000000008649 GJ/\$ PPP
<b>Energy intensity in terms of physical output</b>	NA	NA
<b>Energy intensity</b> (optional) – the relevant metric may be selected by the entity	0.7166GJ/FTE	0.4939 GJ/FTE

**Note:** The data for electricity consumption is for 66 office locations managed by the Company (excluding 2 co-working offices). The data for fuel consumption is calculated considering DG sets of 6 locations and Company owned vehicles.

**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 (Essential indicators of principle 1-9) with TUV India.

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 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
<b>Water withdrawal by source (in kilolitres)</b>		
(i) Surface water	NA	NA
(ii) Groundwater	34,911.06	32,780.30
(iii) Third party water	NA	NA
(iv) Seawater / desalinated water	NA	NA
(v) Others (packaged drinking water)	2,407.25	2,075.64
<b>Total volume of water withdrawal (In kilolitres) (i + ii + iii + iv + v)</b>	<b>34,911.06*</b>	<b>32,780.30</b>
<b>Total volume of water consumption (In kilolitres)</b>	<b>37,318.31</b>	<b>34,855.94</b>

Parameter	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
<b>Water intensity per rupee of turnover</b> (Total water consumption / Revenue from operations)	0.0000006779 KL/₹	0.000000455 KL/₹
<b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total water consumption / Revenue from operations adjusted for PPP)	0.00000003281 KL/\$ PPP	0.000000021718 KL/\$ PPP
Water intensity in terms of physical output	NA	NA
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity	2.54628 KL/FTE	1.24012 KL/FTE

**Note:** Raw water data is available for two office locations: Skymark Noida and Kolkata. For the remaining offices, water consumption is calculated by considering Paytm's occupancy within a specific office site multiplied with an assumption constant of 45 liters per person per day of water consumption as per CGWA (Central Ground Water Authority).

**Note:** Data on packaged drinking water is for 63 office locations, while the remaining office locations utilize direct RO systems.

\*Packaged drinking water is directly procured from registered vendors in bottles/jars, hence it is not considered in water withdrawal but considered in water consumption.

**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 (Essential indicators of principle 1-9) of BRSR with TUV India.

#### 4. Provide the following details related to water discharged:

Parameter	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(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 (I)	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 – Membrane Bioreactor Treatment	18,228.72*	8,566#
(v) Others		
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
<b>Total water discharged (in kilolitres)</b>	<b>18,228.72 KL</b>	<b>8,566 KL</b>

**\*Note:** Sewage Treatment Plant (STP) water data is available for two office locations Bangalore and Skymark, Noida. To calculate the water discharge for 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.

**#Note:** For FY 2023-24, STP water data was reported only for Skymark office located at Noida location.

**Note: 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 (Essential indicators of principle 1-9) with TUV India.

**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 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
NOx	TPY	0.175	1.178
SOx	TPY	0.003	0.178
Particulate matter (PM)	TPY	0.035	0.220
Persistent organic pollutants (POP)	TPY	NIL	NIL
Volatile organic compounds (VOC)	TPY	NIL	NIL
Hazardous air pollutants (HAP)	TPY	NIL	NIL
Others – Carbon Monoxide (CO)	TPY	0.015	0.465

**Note: 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 (Essential indicators of principle 1-9) with TUV India.

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

Parameter	Unit	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
<b>Total Scope 1 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	182.08*	536.49
<b>Total Scope 2 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	1,817.46#	2,527.27
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations)	MtCO <sub>2</sub> e/₹	0.00000004	0.00000004
<b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP)	MtCO <sub>2</sub> e/\$	0.000000001758	0.000000001909
<b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>	MtCO <sub>2</sub> e/MT	NA	NA
<b>Total Scope 1 and Scope 2 emission intensity</b> (optional) – the relevant metric may be selected by the entity	MtCO <sub>2</sub> e/FTE	0.136	0.109

\*Note: Scope 1 emissions have been calculated using the emissions factors published by the DEFRA GHG conversion factors 2024.

#Note: Scope 2 emissions have been calculated using the CO2 Database, user guide, version 20.0, December 2024 published by Central Electricity Authority of India.

**Note: 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 (Essential indicators of principle 1-9) with TUV India.

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

We take great pride in representing our nation on the global stage, advocating for sustainable practices. Since December 2017, our Founder & CEO, Vijay Shekhar Sharma, has served as the United Nations Environment Programme (UNEP) advocate for Clean Air. His leadership has been crucial in promoting environmental action and awareness, spearheading UNEP's global #BreatheLife campaign, which aims to enhance air quality and drive policy changes and citizen actions for a healthier future.

Vijay is also a Member of the Advisory Board of the Green Digital Finance Alliance, which explores how digital finance and fintech innovations can help reshape the financial system in support of sustainable development goals. Our initiatives, such as reducing paper usage through digital transactions and e-receipts, reflect our commitment to conserving resources and minimizing pollution.

Additionally, the Company has taken energy saving initiatives like establishment of Paytm's Corporate office in platinum LEED (Leadership in Energy and Environmental Design) certified campus and installation of LED lights at major offices of Paytm.

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

Parameter	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
<b>Total Waste generated (in metric tonnes)</b>		
Plastic waste (A)	0.02 MT*	NIL
E-waste (B)	226.49 MT	238.11 MT
Bio-medical waste (C)	NIL	NIL
Construction and demolition waste (D)	NIL	0.1 MT
Battery waste (E)	54.38 MT	27.15 MT
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)- Dry waste or Wet waste (Food Waste, Tea Bags & Other Cafeteria Waste etc)	46.27 MT	45 MT
<b>Total (A+B + C + D + E + F + G + H)</b>	<b>327.16 MT</b>	<b>310.36 MT</b>
<b>Waste intensity per rupee of turnover</b> (Total waste generated/ Revenue from operations)	0.0000000059 MT/₹	0.0000000041 MT/₹
<b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Revenue from operations adjusted for PPP)	0.00000000288 MT/\$ PPP	0.00000000196 MT/\$ PPP
<b>Waste intensity in terms of physical output</b>	NA	NA
<b>Waste intensity</b> (optional) – the relevant metric may be selected by the entity	0.022322 MT/FTE	0.011042 MT/FTE
<b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Recycled	280.86 MT	265.25 MT
(ii) Re-used	0 MT	0 MT
(iii) Other recovery operations	0 MT	0 MT
<b>Total</b>	<b>280.86 MT</b>	<b>265.25 MT</b>
<b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>		
<b>Category of waste</b>		
(i) Incineration	NIL	NIL
(ii) Landfilling	46.29	45.12
(iii) Other disposal operations	NIL	NIL
<b>Total</b>	<b>46.29</b>	<b>45.12</b>

**#Note:** Plastic waste data is available for two office locations: Bangalore and Skymark, Noida.

**Note: 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 (Essential indicators of principle 1-9) with TUV India.

**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 involve the use of hazardous or toxic chemicals. To handle e-waste responsibly, the Company has established comprehensive systems of managing waste across all its locations in India. Our commitment to environmental responsibility extends to the disposal of e-waste and battery waste as per the CPCB Guidelines. We strictly adhere to our comprehensive E-Waste SOP, ensuring the proper disposal of E-waste resulting from our business activities. To meet these standards, we collaborate with e-waste vendors listed by CPCB, assuring responsible and compliant e-waste management practices throughout our operations.

To effectively manage other waste, the Company segregates and stores generated waste into two categories: dry waste and wet waste. Suitable bins with proper labelling of waste are used for this purpose. All wastes generated in our premises are carefully managed through our partnership with Government authorized agencies equipped with sorting and processing units.

**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					

**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				

## 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 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
<b>Water withdrawal by source (in kilolitres)</b>		
(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
<b>Total volume of water withdrawal (in kilolitres)</b>	<b>NA</b>	<b>NA</b>
<b>Total volume of water consumption (in kilolitres)</b>	<b>NA</b>	<b>NA</b>
<b>Water intensity per rupee of turnover</b> (Water consumed / turnover)	NA	NA
<b>Water intensity</b> (optional) – the relevant metric may be selected by the entity	NA	NA
<b>Water discharge by destination and level of treatment (in kilolitres)</b>		
(i) Into Surface water		NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(ii) Into Groundwater		NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iii) Into Seawater		NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(iv) Sent to third-parties		NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
(v) Others		NA
- No treatment	NA	NA
- With treatment – please specify level of treatment	NA	NA
<b>Total water discharged (in kilolitres)</b>	<b>NA</b>	<b>NA</b>

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

No assessment/evaluation/assurance carried out for this indicator by an external agency during the year.



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

Parameter	Unit	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
<b>Total Scope 3 emissions</b> (Break-up of the GHG into CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , NF <sub>3</sub> , if available)	Metric tonnes of CO <sub>2</sub> equivalent	34,289.52	65,869.73
<b>Total Scope 3 emissions per rupee of turnover</b>	MtCO <sub>2</sub> e/₹	0.000000622907	0.000000859828
<b>Total Scope 3 emission intensity</b> (optional) – the relevant metric may be selected by the entity	MtCO <sub>2</sub> e/FTE	2.34	2.34

**Note:** 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.

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

No assessment/evaluation/assurance carried out for this indicator by an external agency during the year.

**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 2024-25, a total of 25,270.82 million Sound-box-based transactions have been completed through Paytm-enabled Soundboxes. This has enabled saving paper slips worth 22.2 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.**

The Company has developed a disaster management plan to define the protocols for responding to natural or man-made emergencies, political unrest, or criminal activities that may disrupt business operations and escalate into emergencies. This plan specifies the procedures to follow in such situations.

The Emergency Response Plan (ERP) includes the following key components:

- **Formation of an Emergency Response Team (ERT):** The ERT is made up of individuals trained to prepare for and manage emergency incidents, addressing a wide range of potential crises, including natural disasters and industrial accidents. Through continuous training and awareness programs, the ERT strengthens preparedness and response capabilities.
- **Deployment of a Quick Response Team (QRT):** The QRT team is available round the clock. It consists of a designated driver and two Civil Defence Volunteers skilled in firefighting, search and rescue, and first aid. In emergencies like fires, the Site Security Manager takes primary responsibility for managing staff response efforts and coordinating with external emergency services. The Emergency Coordinator is also responsible for training and assigning QRT Members in fire prevention methods.
- **Incident Documentation:** Incident reports provide detailed records of emergency events, including the circumstances and outcomes. These reports are crucial for post-incident analysis, helping the organization learn from past events, reduce risks, and improve preparedness for future emergencies.



**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). 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 carried out an assessment for 81.25% of its value chain partners which includes suppliers/vendors who contribute to 2% and above of the Company's purchase (by value). This assessment focused on various aspects of the environment like Energy Monitoring & Management, Water & Waste Management, Greenhouse Gas Accounting etc.

**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.**

The Company is affiliated to Nine (9) trade and industry chambers/associations.

**b. List the top 10 trade and industry chambers/ associations (determined based on the total Members of such a 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	National Association of Software and Services Companies (NASSCOM)	National
2	Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
3	Federation of Indian Chambers of Commerce and Industry (FICCI)	National
4	Digital Lenders Association of India (DLAI)	National
5	Confederation of Indian Industry (CII)	National
6	Alliance of Digital India Foundation (ADIF)	National
7	Data Security Council of India (DSCI)	National
8	Internet and Mobile Association of India (IAMAI)/Fintech Convergence Council (FCC)/Payments Council of India (PCI)	National
9	Fintech Association for Consumer Empowerment (FACE)	National

**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 2024-25.		

## 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 the public domain? (Yes/No)	Frequency of Review by Board (Annually/ Half yearly/ Quarterly/ Others – please specify)	Web Link, if available
1	Submitted inputs to industry bodies for 100 days agenda for the new government	Note submitted to industry bodies	No	NA	NA
2	Submitted suggestions to promote Government of India's vision of 'Make In India' through industry bodies.	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
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NA

## 2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&amp;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 ₹)
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NIL

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

Given the nature of the business, this is not applicable to the Company.

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

Particulars	FY 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Directly sourced from MSME/ small producers	10%	32%
Directly from within India	79%	67%

**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 2024-25 Current Financial Year	FY 2023-24 Previous Financial Year
Rural	0.00%	0.00%
Semi-urban	0.21%	0.43%
Urban	57.48%	60.57%
Metropolitan	42.31%	39.00%

**Note:** The percentages are calculated on the basis of CTC for the employees active as on 31<sup>st</sup> March 2025 (for FY 2024-25) and 31<sup>st</sup> March 2024 (for FY 2023-24).

**\*\*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:**

S. No.	State	Aspirational District	Amount spent (In ₹)
1	Karnataka (Partnering with the Scalar Foundation, we awarded ₹25 lakhs in scholarships annually, totaling ₹1 Crore over four years, to support 24 students).	No	0.25 Crores
2	Uttar Pradesh (Donated educational kits to 20 Anganwadi centers in partnership with SHARE NGO)	No	0.05 Crores
3	Pan India (Partnering with United Nation Environment Programme (UNEP) for the Air Quality Action Program (AQAF))	No	2.02 Crores*

**\*Note:** The funds for the UNEP project was transferred from OCL to Paytm Foundation in March, 2025, and the funds to UNEP from Paytm Foundation was released on 8<sup>th</sup> May 2025.

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

The Company 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 share
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.**

Name of the Authority	Brief of the case	Corrective action taken
NA		

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

S. No.	CSR Project	No of persons benefited from CSR projects	% beneficiaries from vulnerable and marginal groups
1	Scholarship to 24 students for pursuing higher studies in collaboration with Scaler Foundation	24	100%
2	Donation of 20 education kits to Aganwadi Centers in Collaboration with SHARE NGO	600	100%

## 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.**

At Paytm, we appreciate the trust placed in us by our customers and merchants and we are committed to providing them the best experience. Our grievance policy is designed to resolve merchant and customer concerns quickly and efficiently while ensuring fair and respectful service.

We aim to offer a smooth and hassle-free experience when customers transact through the Paytm and Paytm for Business App. If customers need any assistance, our in-app Merchant / Customer support is available to help. To support this, our in-app support channels for both merchants and customers are available for assistance, and the grievance redressal process has been clearly outlined to enable timely resolution.

We have categorised the Incident Handling Process based on the products. This process has been categorised based on the nature of services, as outlined below:

**Merchant Solutions** - For QR/Sound Box/EDC related concerns

**Merchant Loan Services** - For Merchant/Business Loans queries

**Consumer Services** - For UPI/Recharge and Utilities/Education /Profile/Gold/Credit Card Bill Payment/Transit/ Mutual Funds/Deals and Credit cards

**Consumer Lending Services** - For Personal Loans related issues

#### Service Levels

##### Level 1 - Complaint Registration

**For Merchant Solutions and Merchant Loan Services** - Please access this link via mobile phone – <https://b.paytm.me/help-support>

**For Consumer Services and Consumer Lending Services** - Please access this link via mobile phone – <https://m.paytm.me/CustomerSupport>

#### Resolution of Complaints:

**Consumer Services and Consumer Lending Services:** A first response is typically provided within 2 hours of complaint receipt. The objective is to resolve all complaints within 2 business days. In case of delays, updates are proactively communicated.

**Merchant Solutions and Merchant Loan Services:** A first response is generally provided within 24 hours, with resolution timelines varying based on the complaint's nature.

#### Level 2 - Escalation of Grievances

##### Complaint Registration:

If a complaint remains unresolved at Level 1, it can be escalated to the Level 2 complaints management team. Escalation is contingent on the existence of a Level 1 ticket, which can be accessed via the "View Tickets" section in the Help & Support area of the app.

**Merchant Solutions:** [offline.nodal@paytm.com](mailto:offline.nodal@paytm.com)

**Merchant Loan Services:** [grievance.businessloan@paytm.com](mailto:grievance.businessloan@paytm.com)

**Consumer Services:** [nodal@paytm.com](mailto:nodal@paytm.com)

**Consumer Lending Services:** [grievance-redressal\\_loandistribution@paytm.com](mailto:grievance-redressal_loandistribution@paytm.com)

##### Resolution of Complaints:

A first response is generally provided within 24 hours of escalation. The goal is to close all Level 2 complaints within 2 business days. Any anticipated delays are proactively shared with the complainant.

For complaints related to Personal Loans, UPI, and Merchant Loan, if the query or complaint has not been satisfactorily resolved within 30 days at previous levels, it can be escalated to the Reserve Bank of India's Ombudsman.

**Complaint Lodging Portal:** <https://cms.rbi.org.in>

**Toll-Free Number:** 14448

**Email ID:** [crpc@rbi.org.in](mailto:crpc@rbi.org.in)

##### Address:

Centralized Receipt and Processing Centre,  
Reserve Bank of India, 4<sup>th</sup> Floor, Sector 17,  
Chandigarh – 160017

For more details, refer to the RBI Ombudsman Guidelines. [https://rbidocs.rbi.org.in/rdocs/content/pdfs/RBIO2021\\_121121.pdf](https://rbidocs.rbi.org.in/rdocs/content/pdfs/RBIO2021_121121.pdf)

**Note:** If an issue reaches Level 2, it should have first been raised at the previous level(s). Escalation should happen only if the issue remains unresolved within the given resolution time. Any requests that skip levels will be redirected accordingly.

Before raising a complaint, it is recommended checking the Help Pages within the Paytm App, where several common concerns are addressed. If further support is required, customers and merchants may reach out to the care team through the app's contact channels.

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

Particulars	As a percentage of total turnover
Environmental and Social Parameters Relevant to Product	Soundbox: 13.88%, POS Machine: 2.64%
Safe and responsible usage	Soundbox: 13.88%, POS Machine: 2.64%
Recycling and /or safe disposal	Soundbox: 13.88%, POS Machine: 2.64%

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

	FY 2024-25 Current Financial Year			FY 2023-24 Previous Financial Year		
	Received during the year	Pending resolution at the end of the year	Remarks	Received during the year	Pending resolution at the end of the year	Remarks
Data Privacy	49	15	All 15 complaints have been resolved as of the date of the report.	11	0	NA
Advertising	0	0	NA	0	0	NA
Cyber Security	0	0	NA	0	0	NA
Delivery of essential services	NIL	NIL	NA	NIL	NIL	NA
Restrictive Trade Practices	NA	NA	NA	NA	NA	NA
Unfair Trade Practices	NA	NA	NA	NA	NA	NA
Others	9,892	59	Source of complaints: RBI, BO, GRO, Nodal, Grievance. All 59 complaints have been resolved as of the date of the report.	13,841	53	All 53 complaints have been resolved.

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

Particulars	Number	Reason for recall
Voluntary recalls	NIL	
Forced recalls		

**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 is deeply committed to safeguarding sensitive information and maintaining the integrity of its operations, and has meticulously crafted a comprehensive 'Information security policy' and 'Acceptable usage policy'. These policies serve as the foundation for our digital defense strategy, outlining stringent measures to thwart potential threats and uphold the trust of stakeholders. These meticulously delineates protocols for scope, data management, access control, confidentiality, incident response, and compliance with regulatory requirements, as per applicability.

**Information Security Policy:**

[https://paytm.com/document/ir/policies-and-guidelines/Information\\_Security\\_Policy.pdf](https://paytm.com/document/ir/policies-and-guidelines/Information_Security_Policy.pdf)

**Acceptable Usage Policy:**

[https://paytm.com/document/ir/policies-and-guidelines/Acceptable\\_Usage\\_Policy.pdf](https://paytm.com/document/ir/policies-and-guidelines/Acceptable_Usage_Policy.pdf)

**Privacy Policy:**

<https://paytm.com/Company/terms-and-conditions?Company=one97&tab=privacy>

**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 2024-25, 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 2024 -25. The Company also has a cyber risk insurance policy.

### c. Impact, if any, of the data breaches -

NA

## Leadership Indicators

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

Information on our products and services are available on our website, Paytm blog, and social media channels (Facebook, Twitter, Instagram). These platforms are regularly updated to keep consumers informed about our offerings. Social media links and applications links are mentioned below to access the relevant information.

**Paytm Website:** <https://paytm.com/>

**Blogs:** <https://paytm.com/blog/>

**Google Play Store:**

**Paytm -** <https://play.google.com/store/apps/details?id=net.one97.paytm>

**Paytm for Business -** <https://play.google.com/store/apps/details?id=com.paytm.business>

**Apple App Store:**

**Paytm -** <https://apps.apple.com/in/app/paytm-secure-upi-payments/id473941634>

**Paytm for Business -** <https://apps.apple.com/in/app/paytm-for-business/id1351301966>

**Facebook:** <https://www.facebook.com/Paytm/>

**Instagram page:** @Paytm

**LinkedIn page:** <https://www.linkedin.com/Company/paytm/>

**Twitter page:** @Paytm

**Youtube page:** <https://www.youtube.com/paytm>

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

To educate consumers about safe and responsible usage, we release press statements, update our blogs, engage on social media, and use app notifications along with FAQs. These efforts aim to keep users informed about best practices and updates.

Similarly, to empower the traders and farmers, Paytm deployed 800 Paytm EDC devices (card machines) across 42 Krishi Mandis in Madhya Pradesh during October'2024. Helping them in facilitating smoother and more secure transactions, enhancing the financial inclusivity and operational efficiency within the local agricultural community.

For the first time, the Krishi Mandi app in Madhya Pradesh has been integrated with Paytm EDC devices (card machines), marking a pivotal step in the digital transformation of agricultural sales. This groundbreaking initiative has revolutionized the sector by digitizing the sales process, cutting costs, and shortening transaction times, which benefits farmers, traders, and other stakeholders.

Leading the charge towards a safer digital India, Paytm also collaborated with the Department of Telecom (DoT) India to bring the spotlight on the Sanchar Saathi platform, driving initiatives and awareness on mobile payment security and digital literacy.

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

To ensure our customers are immediately informed of any service disruptions, we promptly send 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 acknowledge the significance of furnishing our customers with sufficient, clear and transparent information. The Company follows local guidelines of BIS & Legal Metrology Norms on our Product MRP & Packaging. All our products provide customers with complete and pertinent information essential for making informed decisions. Our Company 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 Assurance Statement on Business Responsibility & Sustainability Reporting

To  
The Board of Directors  
One 97 Communications Limited,  
One Skymark, Tower-D, Plot No. H-10B, Sector-98  
Noida - 201304, India

One 97 Communications Limited (hereafter 'Paytm') engage TUV India Private Limited (TUVI) to conduct independent external assurance of BRSR Core disclosures [09 attributes as per Annexure I - Format of BRSR Core](#) following the [\(BRSR Core - Framework for assurance and ESG disclosures for value chain stipulated in SEBI circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122. dated 12/07/2023 and Industry Standards on Reporting of BRSR Core. circular SEBI/HO/CFD/CFD-PoD-1/PICIR/2024/177. dated 20/12/2024\)](#) with reasonable assurance in conjunction with and limited level assurance of the [09 BRSR principles covering Essential Indicators](#). Paytm developed Business Responsibility and Sustainability Report (hereinafter 'the BRSR') for the period 01/04/2024 to 31/03/2025. The BRSR is based on the National Guidelines on Responsible Business Conduct (NGRBC), [SEBI circular: SEBI/HO/CFD/CMD-2/P/CIR/2021/562. dated 10/05/2021](#) followed by the [notification number SEBI/LAD-NRO/GN/2023/131. dated 14/06/2023](#) pertaining to the Business Responsibility and Sustainability Report (BRSR) requirement. This assurance engagement was conducted in reference with BRSR, the terms of our engagement and ISAE 3000 (Revised) requirement.

## Management Responsibility

Paytm developed the BRSR's content pertaining to the [09 BRSR principles covering Essential indicators](#) including the Core disclosures [\(09 attributes as per Annexure I - Format of BRSR Core\)](#) and is responsible for the collection, analysis, authenticity of data and disclosure of the

information presented in the BRSR (web-based and print), including website maintenance, integrity, and for ensuring its quality and accuracy with reference to the criteria stated in the BRSR, such that it's free of misstatements (intentional or unintentional, qualitative or quantitative, including omissions). Paytm will be responsible for providing complete and true information and data. Further responsible for archiving and reproducing the disclosed data to the stakeholders and regulators upon request.

## Scope & Boundary

The scope of work includes the assurance of the following [09 attributes as per Annexure I - Format of BRSR Core](#) and [09 BRSR principles covering Essential indicators](#) disclosed in the BRSR report. The BRSR core requirements encompass essential disclosures pertaining to organization's Environmental, Social and Governance (ESG). In particular, the assurance engagement included the following:

- Review of [09 attributes as per Annexure I - Format of BRSR Core](#) submitted by Paytm
- Review of [09 BRSR principles covering Essential indicators](#)
- Review of the quality of information
- Review of evidence (on a random sample) for limited assurance of [09 BRSR principles covering Essential Indicators](#) and reasonable assurance of [09 attributes as per Annexure I - Format of BRSR Core](#).

TUVI has verified the below [09 attributes as per Annexure I - Format of BRSR Core](#) disclosed in the BRSR.

Attributes	KPI
Green-house gas (GHG) footprint Boundary: Scope 1 Boundary - Consumption from all offices.	Total Scope 1 emissions (with breakup by type) - GHG (C02e) Emission in MT - Direct emissions from organization's owned or controlled sources - Monitored
Scope 2 Boundary - Consumption from all offices.	Total Scope 2 emissions in MT - Indirect emissions from the generation of energy that is purchased from a utility provider - Monitored
	GHG Emission Intensity (Scope 1+2), Total Scope 1 and Scope 2 emissions (MT)/ Total Revenue from Operations adjusted for PPP - Calculated
	GHG Emission Intensity (Scope 1+2), (Total Scope 1 and Scope 2 emissions (MT/FTE) - Calculated

Attributes	KPI	
Water footprint Boundary: All offices.	Total water consumption (in KL) - Monitored and estimated	
	Water consumption intensity - KL/Total Revenue from Operations adjusted for PPP - Calculated	
	Water consumption intensity - KL/FTE - Calculated	
	Water Discharge by destination and levels of Treatment (KL) - Calculated	
Energy footprint Boundary: Refer attribute “Green-house gas (GHG) footprint”	Total energy consumed in GJ - Calculated	
	% of energy consumed from renewable sources - In % terms - Calculated	
	Energy intensity - GJ/Rupee adjusted for PPP - Calculated	
	Energy intensity - GJ/FTE - Calculated	
Embracing Circularity – details related to waste management by the entity Boundary: all offices	Plastic waste (A) (MT) - Monitored	
	E-waste (B) (MT) - Monitored	
	Bio-medical waste (C) (MT) - Monitored	
	Battery Waste (D) (MT) - Monitored	
	Total waste generated (A + B + C + D) (MT) - Calculated	
	Waste intensity - Calculated	
	• MT/Rupee Adjusted for PPP	
	• MT/FTE	
	Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (MT) – Monitored	
	Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (Intensity)	
	• Waste Recycled Recovered/Total Waste generated – Calculated	
	For each category of waste generated, total waste disposed by nature of disposal method (MT) Monitored	
	For each category of waste generated, total waste disposed by nature of disposal method (Intensity) – Calculated	
	• Waste Recycled Recovered/Total Waste Generated	
Enhancing Employee Wellbeing and Safety	Spending on measures towards well-being of employees and workers – cost incurred as a % of total revenue of the Company – in % terms – Monitored and calculated.	
	Details of safety related incidents for employees and workers (including contract-workforce e.g. workers in the Company's construction sites)	
	1. Number of Permanent Disabilities - Monitored	
	2. Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) - Monitored	
Enabling Gender Diversity in Business	3. No. of fatalities - Monitored	
	Gross wages paid to females as % of wages paid - In % terms – Calculated	
	Complaints on POSH	Total Complaints on Sexual Harassment (POSH) reported – Monitored
		Complaints on POSH as a % of female employees/workers– Monitored
Complaints on POSH upheld – Monitored		
Enabling Inclusive Development	Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/small producers and from within India - In % terms – As % of total purchases by value – Monitored	
	Job creation in smaller towns – Wages paid to persons employed in smaller towns (permanent or non-permanent/on contract) as % of total wage cost - In % terms – As % of total wage cost – Monitored.	
Fairness in Engaging with Customers and Suppliers	Instances involving loss/breach of data of customers as a percentage of total data breaches or cyber security events - In % terms - Monitored	
	Number of days of accounts payable - (Accounts payable *365)/Cost of goods/services procured	

Attributes	KPI
Open-ness of business	Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties
	1) Purchases from trading houses as % of total purchases 2) Number of trading houses where purchases are made from 3) Purchases from top 10 trading houses as % of total purchases from trading houses 1) Sales to dealers/distributors as % of total sales* 2) Number of dealers/distributors to whom sales are made* 3) Sales to top 10 dealers/distributors as % of total sales to dealers / distributors* Share of RPTs (as respective %age) in - Monitored <ul style="list-style-type: none"> <li>• Purchases</li> <li>• Sales</li> <li>• Loans &amp; advances</li> <li>• Investments</li> </ul>

\*marked indicators are Not Applicable as the Fastag business has been discontinued in PY.

TUVI has Verified below mentioned Essential Indicators which fall under BRSR Principles.

BRSR Principles	Essential Indicators
Principle 1	Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent, and Accountable
Principle 2	Businesses should provide goods and services in a manner that is sustainable and safe
Principle 3	Businesses should respect and promote the well-being of all employees, including those in their value chains.
Principle 4	Businesses should respect the interests of and be responsive to all their stakeholders
Principle 5	Businesses should respect and promote human rights.
Principle 6	Businesses should respect and make efforts to protect and restore the environment.
Principle 7	Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
Principle 8	Businesses should promote inclusive growth and equitable development.
Principle 9	Businesses should engage with and provide value to their consumers in a responsible manner.

\*marked indicators are Not Applicable as per the nature of Company's product and service offerings.

#### Notes:

Waste: The data of the total waste recovered through recycling, re-using or other recovery operations or total waste disposed by nature of disposal method could be assessed based on interviews and sample records as presented during the onsite visit.

The reporting boundaries for the above attributes include 18 Regional offices (2 are co-working space) and 50 Fleet hub offices spread across India. An on-site verification was conducted at Corporate Offices in Noida, Bangalore & Mumbai between 27/01/2025 to 16/04/2025.

#### Onsite Verification

- One 97 Communications Limited ("Paytm"), One Skymark, Tower-D, Plot No. H-10B, Sector-98, Noida-201304 - 27/01/2025 and 28/01/2025.
- One 97 Communications Limited ("Paytm"), First floor, Enterprise Centre, Vile Parle (East), Mumbai-400099 - 31/01/2025.
- One 97 Communications Limited ("Paytm"), 'The Hub' Third floor, (Font Wing & Rear wing) & 4<sup>th</sup> Floor, (Rear Wing) Sy No. 8/2, Ambalipura Village, Varthur Hobli, Bangalore East Taluk, Sarjapura Main Road, Bangalore - 560102 - 4/02/2025.
- One 97 Communications Limited ("Paytm"), One Skymark, Tower-D, Plot No. H-10B, Sector-98, Noida-201304 - 15/04/2025 and 16/04/2025.

The assurance activities were carried out together with a desk review as per reporting boundary.

### Limitations

TUVI did not perform any assurance procedures on the prospective information disclosed in the Report, including targets, expectations, and ambitions. Consequently, TUVI draws no conclusion on the prospective information. During the assurance process, TUVI did not come across any limitation to the agreed scope of the assurance engagement. TUVI did not verify any ESG goals and claims through this assignment. TUVI verified data on a sample basis; the responsibility for the authenticity of data entirely lies with Paytm. Any dependence of person or third party may place on the BRSR Report is entirely at its own risk. TUVI has taken reference of the financial figures from the audited financial reports. Paytm will be responsible for the appropriate application of the financial data. The application of this assurance statement is limited w.r.t [SEBI circular: SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated Jul 12 2023](#) and [Industry Standards on Reporting of BRSR Core. circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177. dated 20/12/2024](#)). This assurance statement does not endorse any environmental and social claims (related to the product, manufacturing process, packaging, disposal of product etc.) as well as advertisements by the reporting organization. TUVI does not permit use of this statement for Greenwashing or misleading claims. The reporting Organization is responsible for ensuring adherence to relevant laws.

### Our Responsibility

TUVI's responsibility in relation to this engagement is to perform a limited level of BRSR assurance for [09 BRSR principles covering Essential Indicators](#) and reasonable level of assurance for [09 attributes as per Annexure I - Format of BRSR Core](#) and to express a conclusion based on the work performed. Our engagement did not include an assessment of the adequacy or the effectiveness of Paytm's strategy, management of ESG-related issues or the sufficiency of the Report against BRSR reporting principles, other than those mentioned in the scope of the assurance. TUVI's responsibility regarding this verification is in reference to the agreed scope of work, which includes assurance of non-financial quantitative and qualitative information disclosed by Paytm. The Reporting Organization is responsible for archiving the related data for a reasonable time period. The intended users of this assurance statement are the management of 'Paytm'. The data is verified on a sample basis, the responsibility for the authenticity of data lies with the reporting organization. TUVI expressly disclaims any liability or co-responsibility 1) for any decision a person or entity would make based on this assurance statement and 2) for any damages in case erroneous data is reported. This assurance engagement

is based on the assumption that the data and information provided to TUVI by Paytm are complete and true.

### Verification Methodology

During the assurance engagement, TUVI adopted a risk-based approach, focusing on verification efforts with respect to disclosures. TUVI has verified the disclosures and assessed the robustness of the underlying data management system, information flows, and controls. In doing so:

- TUVI examined and reviewed the documents, data, and other information made available by Paytm for non-financial [09 attributes as per Annexure I - Format of BRSR Core](#) and [09 BRSR principles covering Essential Indicators](#) (non financial disclosures)
- TUVI conducted interviews with key representatives, including data owners and decision-makers from different functions of Paytm.
- TUVI performed sample-based reviews of the mechanisms for implementing the sustainability-related policies and data management (qualitative and qualitative)
- TUVI reviewed the adherence to reporting requirements of "BRSR"

### Opportunities for Improvement

The following are the opportunities for improvement reported to Paytm. However, they are generally consistent with Paytm management's objectives and programs. Paytm already identified below topics and Assurance team endorse the same to achieve the Sustainable Goals of organization.

- Paytm may strengthen its internal reporting by opting a smart cloud-based data management system and complement the same with periodic internal data and performance reviews.
- Paytm may target net zero carbon and develop policies focusing on the GHG and energy reduction along with targets and timelines.
- Paytm can utilize the best practice/requirements of ISO 20400 to develop its sustainable procurement policy.
- Paytm can conduct ESG Assessment of its value chain partners in a phased manner.
- Paytm may emphasize on developing a separate Human Rights Policy and publish for stakeholder reference.
- Paytm can implement the process of taking declarations from the scrap vendors to monitor the end use of its scrapped material through the

instruments like tenders, PO's, strengthening the waste disposal process.

### Conflict of Interest

In the context of BRSR requirements set by SEBI, addressing conflict of interest is crucial to maintain high integrity and independence of assurance engagements. As per SEBI guidelines, assurance providers need to disclose any potential conflict of interest that could compromise the independence or neutrality of their assessments. TUVI diligently identifies any relationships, affiliations, or financial interests that could potentially cause conflict of interest. We proactively implement measures to mitigate or manage these conflicts, ensuring independence and impartiality in our assurance engagements. We provide clear and transparent disclosures about any identified conflicts of interest in our assurance statement. We recognize that failure to address conflict of interest adequately could undermine the creditability of the assurance process and the reliability of the reported information. Therefore, we strictly adhere to SEBI guidelines and take necessary measures to avoid, disclose, or mitigate conflicts of interest effectively.

### Our Conclusion

In our opinion, based on the scope of this assurance engagement, the disclosures on BRSR Core KPI described in the BRSR report along with the referenced information provides a fair representation of the 9 attributes, and meets the general content and quality requirements of the BRSR. TUVI confirms its competency to conduct the assurance engagement for the BRSR as per SEBI guidelines. Our team possesses expertise in ESG verification, assurance methodologies, and regulatory frameworks. We ensure independence, employ robust methodologies, and maintain continuous improvement to deliver reliable assessments.

**Disclosures:** TUVI is of the opinion that the reported disclosures generally meet the BRSR requirements. Paytm refers to General Disclosure to report contextual information about Paytm, while the Management and Process discloses the management approach for each indicator [09 Attributes as per Annexure I – Format of BRSR Core](#) as well as [09 BRSR Principles covering Essentials Indicators](#).

**Limited Assurance:** Based on the procedures we have performed; nothing has come to our attention that causes us to believe that the information subject to the limited assurance engagement was not prepared in all material respects. TUVI found the information to be reliable in all principles, with regards to the reporting criteria of the BRSR.

**Reasonable Assurance:** As per SEBI reasonable assurance requirements including scope of Assurance, Assurance methodologies (risk-based approach and data validation techniques), mitigating conflicts of interests, documentation

on evidence and communication on findings, TUVI can effectively validate the accuracy and reliability of the information presented in the BRSR, instilling confidence in stakeholders and promoting transparency and credibility in ESG reporting practices.

### BRSR Complies with the below requirements

- a) **Governance, leadership and oversight:** The messages of top management, the business model to promote inclusive growth and equitable development, action and strategies, focus on services, risk management, protection and restoration of environment, and priorities are disclosed appropriately.
- b) **Connectivity of information:** Paytm discloses [09 attributes as per Annexure I – Format of BRSR Core](#) and [09 BRSR principle covering Essential Indicators](#) of their inter-relatedness and dependencies with factors that affect the organization's ability to create value over time.
- c) **Stakeholder responsiveness:** The Report covers mechanisms of communication with key stakeholders to identify major concerns to derive and prioritize the short, medium and long-term strategies. The Report provides insights into the organization's relationships (nature and quality) with its key stakeholders. In addition, the Report provides a fair representation of the extent to which the organization understands, takes into account and responds to the legitimate needs and interests of key stakeholders.
- d) **Materiality:** The material issues within 9 attributes and corresponding KPI as per BRSR requirement are reported properly.
- e) **Conciseness:** The Report reproduces the requisite information and communicates clear information in as few words as possible. The disclosures are expressed briefly and to the point sentences, graphs, pictorial, tabular representation is applied. At the same time, due care is taken to maintain continuity of information flow in the BRSR.
- f) **Reliability and completeness:** Paytm has established internal data aggregation and evaluation systems to derive the performance. Paytm confirms that, all data provided to TUVI, has been passed through QA/QC function. The majority of the data and information was verified by TUVI's assurance team (on sample basis) during the BRSR verification and found to be fairly accurate. All data is reported transparently, in a neutral tone and without material error.
- g) **Consistency and comparability:** The information presented in the BRSR is on yearly basis and reported in reliable and complete manner. Thus, the principle of consistency and comparability is established.



**Independence and Code of Conduct:** TUVI follows IESBA (International Ethics Standards Board for Accountants) Code which adopts a threats and safeguards approach to independence. We recognize the importance of maintaining independence in our engagements and actively manage threats such as self-interest, self-review, advocacy, and familiarity. The assessment team was safeguarded from any type of intimidation. By adhering to these principles, we uphold the trust and confidence of our clients and stakeholders. In line with the requirements of the SEBI circular [SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122. dated 12/07/2023](#) and [Industry Standards on Reporting of BRSR Core. circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2024/177. dated 20/12/2024](#). TUVI confirms that there is no conflict of interest with Paytm.

TUVI solely focuses on delivering verification and assurance services and does not engage in the sale of service or the provision of any non-audit/non-assurance services, including consulting.

**Quality control:** The assurance team complies with quality control standards, ensuring that the engagement partner possesses requisite expertise and the assigned team collectively has the necessary competence to perform

engagements in reference with standards and regulations. Assurance team follows the fundamental principles of integrity, objectivity, professional competence, due care, confidentiality and professional behavior. In accordance with International Standard on Quality Control, TUVI maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### Our Assurance Team and Independence

TUVI is an independent, neutral third-party providing ESG Assurance services with qualified environmental and social specialists. TUVI states its independence and impartiality and confirms that there is "no conflict of interest" with regard to this assurance engagement. In the reporting year, TUVI did not work with Paytm on any engagement that could compromise the independence or impartiality of our findings, conclusions, and observations. TUVI was not involved in the preparation of any content or data included in the BRSR, with the exception of this assurance statement. TUVI maintains complete impartiality towards any individuals interviewed during the assurance engagement.

For and on behalf of TUV India Private Limited



Manojkumar Borekar  
Product Head - Sustainability Assurance Service  
TUV India Private Limited



Date: July 22, 2025  
Place: Mumbai, India  
Project Reference No: 8123455946  
Revision: 09