

## **227<sup>th</sup> Board Meeting held on November 21, 2025**

### **To approve the updates in the Anti-Bribery and Anti-Corruption Policy**

#### **AGENDA**

The Updated Anti-Bribery and Anti-Corruption Policy was approved by the Board of Directors in the meeting held on 3rd August 2024.

The Governing Board of CDSL directed that all critical policies of CDSL be reviewed by M/s Legasis Partners (Legasis) in terms of the new criminal laws and suggest changes, if any.

Accordingly, the Anti-Bribery and Anti-Corruption Policy was reviewed by Legasis.

All the accepted recommendations and changes suggested by Legasis have been duly incorporated into the policy.

In addition, certain changes have also been made to add more clarity.

#### **Approval Required:**

The Governing Board is requested to consider and approve the updates in the Anti-Bribery and Anti Corruption Policy

#### **Minutes**

The Governing Board, directed that all critical policies of the Company be reviewed by M/s. Legasis Partners, in light of the new criminal laws, and that necessary change recommendations be provided.

Accordingly, the Policy was reviewed by M/s. Legasis Partners and their recommendations were discussed and incorporated in the Policy.

The Governing Board was informed about the following amendments that were made:

- Review frequency was updated to 'at least once in a financial year'
- Added definitions of 'Anti-bribery and Anti-Corruption Laws' and 'Undue Advantage'
- The definition of 'Bribe' has been elaborated
- Updated references to new laws, wherever applicable

In addition, certain language changes have been incorporated to provide better clarity.

**Decision:**

The Governing Board, after due deliberations, approved the updates in the Anti-Bribery and Anti-Corruption Policy and passed the following resolution unanimously:

**“RESOLVED THAT** the consent of the Governing Board be and is hereby accorded to approve the updates in the Anti-Bribery and Anti-Corruption Policy as per the note placed before the Governing Board.

**RESOLVED FURTHER THAT** Shri Nehal Vora, Managing Director & CEO, Shri Vinay Madan, Chief Risk Officer, and Shri Nilay Shah, Company Secretary & Compliance Officer, be and are hereby severally authorized to do all such acts, deeds and things as they deem fit and expedient to give effect to this resolution including to make reasonable and minor modifications in the contents of policy.”

**Board Agenda Note for Circulation**

**To take note of the Resignation of Shri Amar Chakravarty, as an Independent External Professional from the Standing Committee on Technology (SCOT) w.e.f. November 03, 2025**

**AGENDA**

The Governing Board is hereby informed that Shri Amar Chakravarty, Independent External Professional, has resigned from the position of Independent External Professional (IEP) as a member of the Standing Committee on Technology (SCOT) of Central Depository Services (India) Limited (CDSL) with effect from November 03, 2025, due to personal reasons.

Shri Amar Chakravarty was appointed as a Member of the SCOT of the Company with effect from January 30, 2023.

The Governing Board is requested to take note of the same.

**MINUTES**

The following updates were shared with the Governing Board for information:

<b>Sr. No.</b>	<b>Updates shared with the Governing Board for Information</b>	<b>Date of Email</b>
1.	To take note of the Resignation of Shri Amar Chakravarty, as an Independent External Professional from the Standing Committee on Technology (SCOT) w.e.f. November 03, 2025	03.11.2025

The Governing Board took note of the same.