



CSR Policy
For IIFL Wealth Management
Group

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Nomenclature:

For the purpose of the CSR Policy, the following nomenclature will apply.

IIFL Wealth Group of Companies:

This terminology collectively refers to all the companies that constitute the entire IIFL Wealth group, that fall under the apex holding company - IIFL Wealth Management Limited.

IIFLW:

This terminology collectively refers to refers to IIFL Wealth Management Limited and each of its subsidiaries that falls under the ambit of the Section 135 of the Companies Act 2013.

1. Preamble

IIFLW envisions becoming the most respected brand in the financial services space in India. To realize this vision, IIFLW recognizes the importance of contributing to sustainable social transformation. The approach to the business focuses on one hand, on building trust, knowledge and delivering quality service to its customers and on the other, to provide timely assistance to the country's under-banked customers. Furthermore, IIFLW's CSR (Corporate Social Responsibility) projects are aligned to the focus of the business, and thereby help IIFLW carve out a reputation for being one of the most committed and responsible companies in the industry.

2. Purpose

The key purpose of this Policy is to:

- Define the broad development areas that the IIFLW shall undertake
- Outline the governance structure for CSR management within the IIFLW
- Serve as a guiding document to help identify, execute and monitor CSR projects
- Explain the manner in which the surpluses from CSR projects will be treated

3. Policy Statement

The IIFLW's CSR Policy and projects are steered by the same values that guide the business of the IIFLW Group of Companies. It can be summarized in one acronym – GIFTS, which stands for:

- **G**rowth
- **I**ntegrity
- **F**airness
- **T**ransparency
- **S**ervice Orientation

By applying these values to the CSR projects, IIFLW aims to undertake initiatives that create sustainable growth and empowers underprivileged sections of society.

4. Scope of CSR Policy

This Policy applies to all CSR projects undertaken by IIFLW and fulfils all the requirements of Section 135 of the Companies Act 2013. IIFLW shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act 2013. This Policy will be periodically reviewed and updated in line with relevant codes of legislation and international standards and best practices.

5. Normal Course of Business

IIFLW is a public limited company and is registered with SEBI as Stock Broker, Depository Participant, Research Analyst, Portfolio Manager and Distributor of Financial Products. IIFLW mainly acts as wealth manager and mainly provides services relating to financial products distribution, advisory, portfolio management services by mobilizing funds and assets of various classes of investors including High Networth Individuals. IIFLW is committed to, providing quality services to its customers while continuously undertaking measures to grow the business by expanding IIFLW's reach and through other innovative measures. IIFLW conducts its operations in compliance with applicable laws, regulations and standards while conforming to the highest standards in design, procurement, resource management and construction practices.

6. Mode of implementation

The CSR initiatives will be primarily implemented through a section 8 entity to be constituted as per the Companies Act, 2013, and IIFLW's CSR team, and other not-for-profit organisations/ NGOs.

Alternatively, IIFLW may choose to partner with implementing agencies that qualify all mandatory criteria of Section 135 of the Companies Act 2013.

7. Statement of Commitment

The Company at all is committed to:

1. Engage with communities to understand their material expectations and concerns and will consider these material expectations and concerns to design its CSR agenda.
2. Implement, monitor, review and evaluate CSR initiatives to achieve the desired outcomes in a transparent manner.
3. Promote education interventions to serve the less privileged and empower them to transform their lives.
4. Encourage its employees to contribute and volunteer for various community development initiatives.
5. Ensure that surplus arising out of CSR initiatives is utilized to further augment CSR agenda and does not form part of the Company's profits.
6. Comply with all legal provisions applicable for CSR and adopt industry best practices, where feasible.

8. Key focus areas

The CSR projects at IIFLW focus on the following areas of intervention that are aligned with the items listed in Schedule VII of the Companies Act 2013.

8.1. Sustainable Development

IIFLW and/or/through its section 8 company will support sustainable development or sustainability activities such as tree plantation either directly or through an external stakeholder/ NGO. The Company shall provide support to NGOs working towards maintaining ecological balance, protection of flora and fauna, animal welfare, agriculture, agro forestry, forestry, conservation of natural resources and maintaining quality of soil, air and water and water harvesting. Further, IIFW Company will extend support to Not for Profit Organizations, NGOs, Institutes, Institutional Bodies and other such organizations that are committed to and work in areas of Environment-Social-Governance (ESG), Sustainability, CSR either through direct activities or in the form of advisory, policy advocacy and stakeholder awareness, etc.

8.2. Sustainable Livelihood

IIFLW recognizes that it is imperative to mainstream the disengaged to participate in the labour force of the country and adapt to a sustainable livelihood in order to contribute positively to the nation building process. The intervention areas under livelihoods for IIFLW encompass two broad verticals: Entrepreneurship and Employment. IIFLW will support holistic development in regions identified by engaging with the said communities and enabling them to attain sustainable livelihood opportunities.

8.2.1. Entrepreneurship

IIFLW undertakes projects that support small-scale enterprises run by marginalized communities and equip them with skills and resources to run the enterprises. These projects are further divided into those that are focused on agro-based enterprises and those that focus on non-agro-based enterprises.

8.2.2. Employment

Projects that fall under this category focus on enhancing employment potential of unskilled or underskilled populations. These include pre-livelihood training, which involves career counseling for school children that focus on reducing drop-out rates of students.

8.3. Promoting Education

Education is one of the basic building blocks of a great nation. A literate population can catapult India towards realizing its demographic dividend. For IIFLW, education is one of the key focus areas for CSR. The CSR projects in education will include promoting education, setting up and upgrading educational facilities and supporting institutes of higher education.

The initiatives will focus on providing financial and other resources support to schools including infrastructure, scholarships and coaching to deserving children, parents, teachers, headmasters, principals and administrators to provide holistic learning environment for children at school and home including mid-meals and other required nutrition and health related support.

8.4. Financial literacy

IIFLW believes that individuals with basic financial knowledge can make informed financial decisions and therefore, maintain better financial health. Through its CSR projects, IIFLW will endeavor to provide information of financial products, especially of rewards and risks, in order to better equip the financially excluded to make informed choices with respect to money. The company has undertaken projects that focus on educating school students and slum women in this respect. The school children targeted are largely those who are studying in 8th or 9th standard, and include students both from urban schools (both private and municipal schools) and rural schools.

8.5. Promoting preventive healthcare and sanitation

In its endeavor to promote healthcare (including preventive healthcare), CSR projects of IIFLW seek to support those healthcare initiatives and medical research institutions that aim to enhance healthcare access, especially to the disadvantaged and underprivileged. IIFLW shall also promote sanitation by sensitizing the children on personal and community hygiene. On a case by case basis, the Company will also support various NGOs working in the fields of healthcare, sanitation, eradication of hunger and

malnutrition, and provision of access to safe drinking water. The Company will also conduct periodic blood donation drives.

8.6. Rural development

Majority of India's population lives in the rural areas and is still deprived of infrastructure and services required for basic subsistence. With the objective of contributing towards the improvement of the economic and social wellbeing of the people in rural areas, IIFLW will adopt villages and undertake projects that focus on all aspects of rural area development. These projects primarily focus on tribal villages in the states of Maharashtra and Rajasthan

8.7 Relief and Rehabilitation:

In cases of natural calamities and disasters, IIFLW will support relief and rehabilitation activities undertaken by the Prime Minister's National Relief Fund, Chief Minister's Relief Fund or any Central or State Government Body / Bodies or NGOs, Corporate entity or a group of Corporates including the IIFL Wealth Foundation directly.

8.8 Reducing inequalities faced by socially and economically backward groups:

IIFLW shall support NGOs working towards rehabilitating socially and economically backward sections of society by providing safe houses through community house building initiatives. The Company shall also support NGOs working towards promoting gender equality, empowering women, setting up homes and hostels for women and orphans, aaganwadis, panchayats, community halls, setting up old age homes, day care centres and other such facilities for senior citizens, and reducing inequalities faced by socially and economically backward groups including tribals, marginal / landless farmers, landless labourers, such people who are below the poverty line across all segments.

8.9 Clean India:

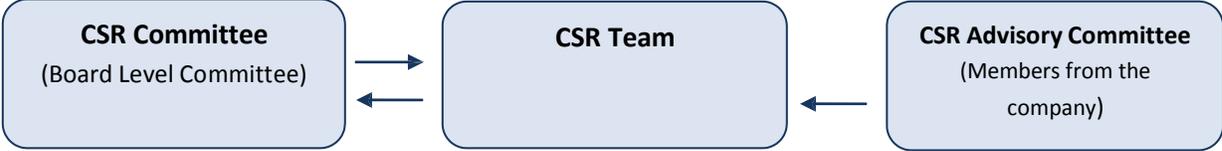
IIFLW will work directly and / or support NGOs working towards making India clean but not limited to initiatives such as Swacch Bharat Kosh, Clean Ganga Fund, etc. This would encompass a broad spectrum of initiatives including cleaning of roads, bus stations, railway platforms and such other public facilities, building communal toilets and public sanitation facilities, cleaning Ganga and other rivers, education and awareness generation on personal, household and environmental sanitation.

8.10 Sports:

The Company will support rural sports, nationally recognized sports, Paralympic sports and Olympic sports including the training and development of sportsmen of the said sports.

9. Governance Structure

IIFLW has constituted a robust and transparent governing mechanism to oversee the implementation of its CSR Policy, in compliance with the requirements of Section 135 of the Companies Act 2013. At the helm of this mechanism the Board of Directors of IIFLW, is ultimately accountable for the CSR projects undertaken by IIFLW.



9.1. CSR Committee

IIFLW has constituted a CSR Committee that reports to the Board of IIFLW with respect to matters related to CSR.

9.1.1. Responsibilities

- Formulate and update the CSR Policy, to be approved by the Board of IIFLW.
- Suggest areas of intervention to the Board of IIFLW.
- Approve projects that are in line with the CSR Policy.
- Put monitoring mechanisms in place to track the progress of each project.
- Recommend the CSR expenditure to the Board of IIFLW, for approval.
- Meet periodically a year to review the progress made.

9.2. CSR Team

CSR Team is at the core of all CSR activities at IIFL Wealth Management Limited. They are responsible for ensuring effective implementation of CSR projects.

9.2.1. Responsibilities

- Responsible for the execution of the decisions taken by the Board level CSR Committee
- Project and partner identification
- Partner due Diligence
- Implementation and impact assessment
- Report periodically to the Board level CSR Committee
- Review progress every quarter

9.3. CSR Advisory Committee

The Advisory Committee provides inputs to the CSR Team to help them plan and implement CSR Projects.

10. CSR Budget

The total budget for the CSR projects will be decided annually in accordance with the goals and priorities of IIFLW.

11. Project Life-Cycle

At IIFLW, the CSR Committee of the Board will work closely with IIFL Foundation/ IIFL Wealth Foundation or such other section 8 entity that may be incorporated for implementing CSR initiatives, the CSR Team and the CSR Advisory Committee to identify projects that are in alignment to the vision and goals of the companies.

Following the approval of the Board of IIFLW, the CSR Team will formulate implementation plans for the projects specifying the following:

- (i) Activities to be undertaken
- (ii) Budgets proposed

- (iii) Time frame of implementation
- (iv) Responsibilities and authorities for implementation
- (v) Results expected to be achieved post implementation.

Monitoring

The CSR Team will monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports. Mechanisms to track data and monitor projects will be established to ensure the transparency and efficiency of the implementation process. The projects will be evaluated against the milestones defined in the implementation plan of the project. The CSR Team will present monitoring reports of the projects to the Board level CSR Committee on a periodic basis. The fund utilization report will conform to the format prescribed U/S 134 and U/S 135 of the Companies Act, 2013 and as per the updates / revised notification issued by the Ministry of Corporate Affairs from time to time.

Reporting

The CSR Committee of the Board, based on reports presented by the CSR Team, will annually publish report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act 2013. The CSR Committee shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR Policy is in compliance with the approved CSR Policy of IIFLW.

The CSR Policy on being approved by the Board shall be displayed on the website of IIFLW and any modifications carried out from time to time shall also be updated on the website of IIFLW respectively.

11. Treatment of Surpluses

Any surplus generated from CSR projects undertaken by IIFLW will be tracked and channelized into the IIFLW's CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.