

CSR POLICY

of

AKARA CAPITAL ADVISORS PRIVATE LIMITED

1. Preamble

Pursuant to the provisions of section 135 and schedule VII of Companies Act, 2013 (“the **Act**”) read with the Companies (Corporate Social Responsibility) Rules, 2014 (“the **CSR Rules**”), Akara Capital Advisors Private Limited is (“the **Company**”) is required to constitute Corporate Social Responsibility Committee (“the **Committee**”). The Act provides that the Committee shall recommend to the Board of Directors of the Company (“the **Board**”) a policy, relating to identification of list of activities/ projects/ programs for the purpose of CSR expenditure, implementation and monitoring thereon. This Policy is formulated in compliance with the requirement of the Act read along with the applicable rules thereto. The Board has taken note of the various processes which may be modified based on practical parameters, as and when necessary.

The Board has approved this policy in its meeting held on 17th December, 2022.

2. Objective

The CSR policy aims to lay down norms to enable the Company to contribute to the society through the activities it envisages from time to time.

CSR Committee

- A. The Company has formed a Corporate Social Responsibility Committee of the following members:
1. Mr. Tushar Aggarwal - Chairperson of CSR Committee
 2. Ms. Shruti Aggarwal – Member
 3. Mr. Radhakrishnan Iyer – Member (Note: as per the section the three directors need to be non executive and atleast half independent)
 4. Mr. SC Sinha – Special Invitee

(Hereinafter referred to as “**CSR Committee**”)

- B. The responsibility of the CSR Committee shall be as under:
1. To ensure compliance to CSR Policy and alignment of the proposed project/activity with the priority areas identified by the CSR Committee
 2. To identify, scrutinize and propose projects related to activities mentioned under the Policy
 3. To assess the need of the project and its impact on target beneficiaries
 4. To identify of delivery mechanism for a given activity
 5. To prepare timeline and estimated expenditure for a particular activity
 6. To identify an implementing agency and allotting the project after sanction
 7. To frame terms of reference for implementation of a given activity
 8. To ensure proper and timely utilization of the CSR funds earmarked by the company
 9. To examine sustainability of the project after implementation

- C. On satisfactory compliance of the above, a proposal shall be submitted to the Board for approval.
- D. The CSR Committee shall be responsible for facilitating a CSR audit in the company and shall be responsible for any finding, related to deviations from the CSR policy of the company. The team shall perform any other responsibilities as may be defined by the Managing Director from time to time.

3. CSR Programme Area

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged by one or more of the following focus areas as notified under Section 135 of the Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014:

- i. Eradicating hunger, poverty & malnutrition, promoting preventive health care & sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation & making available safe drinking water.
- ii. Promoting education, including special education & employment enhancing vocation skills especially among children, women, elderly & the differently abled & livelihood enhancement projects;
- iii. Promoting gender equality, empowering women, setting up homes & hostels for women & orphans, setting up old age homes, day care centers & such other facilities for senior citizens & measures for reducing inequalities faced by socially & economically backward groups;
- iv. ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water [including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga].
- v. protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts;
- vi. measures for the benefit of armed forces veterans, war widows and their dependents, [Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows];
- vii. training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports.
- viii. contribution to the prime minister's national relief fund 8[or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;

ix. (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).]

x. rural development projects]

xi. slum area development.

Explanation.- For the purposes of this item, the term `slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.]

xii. disaster management, including relief, rehabilitation and reconstruction activities.]

The Above list is illustrative not exhaustive. All activities under the CSR activities should be environment friendly and socially acceptable to the local people and Society and comes under the purview of Schedule VII of Companies Act, 2013 and rules made thereunder, amended from time to time.

4. Key Focus Areas

Within the ambit of schedule VII of the Act, the Committee has identified the following Key Focus Areas which the Committee will work on completing the CSR goals.

- Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows

Additional focus areas may be introduced to aforesaid list with the approval of the CSR Committee.

5. CSR Activities/ Projects/ Programs

It is the responsibility of the Board of Directors and the CSR Committee to ensure that activities included by the Company as part of CSR Expenditure, are related to the areas or subjects specified in schedule VII of the Act.

6. CSR Budget

The Board of Company shall ensure that in each financial year, the Company spends 2% of the average net profit made during the immediate three preceding financial years.

The unutilized CSR budget from the 2% of the average net profit will be parked in a CSR Fund (Corpus) created by the company. This Fund would also include any income arising there from and any surplus arising out of CSR activities.

In case of any surplus arising out of CSR projects the same shall not form part of business profits of the Company.

7. Resources

Akara Capital Advisors Private Limited shall deploy such resources as may be required necessary to meet the objectives of the Company. Surplus, if any, arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.

8. Geographies and target communities

The geographical focus of CSR activities will be where the Company has presence and nearby areas.

9. Monitoring & Review

Implementation of this policy will be monitored and reviewed periodically by the CSR committee. The CSR Committee will review the policy's effectiveness and implementation on a regular basis and report relevant findings and recommendations to the Board. The monitoring exercise shall include, inter alia, periodic monitoring of the utilization of funds allocated for CSR activities and impact assessments in case of major projects via an impact study or evaluation by external agencies. For major projects, wherever possible, the funds shall be disbursed on the basis of milestones achieved, i.e, the progress of work.

10. CSR Reporting

The Company shall report the details of CSR Program or projects undertaken under its CSR policy as specified under the Companies Act, 2013.

11. Disclosure

The Company will disclose its Corporate Social Responsibility performance in a transparent manner to all its stake holders and the community at large on a regular basis through adequate information in its annual report and provision of transparent and objective information.