LAPIS INDIA CAPITAL ADVISORS PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY [CSR] POLICY

This Corporate Social Responsibility Policy ("the CSR Policy") has been framed in accordance with Section 135, Schedule VII of the Companies Act, 2013, and the rules made therein by Lapis India Capital Advisors Private Limited (the Company), which is a Private Limited Company incorporated on 10th March 2016 under the Companies Act, 2013, having its registered office and its corporate office at Unit No 301 to 306, 3rd Floor, Makhija Chamber, 196 Turner Road, Bandra (West), Mumbai 400050.

Unless the context otherwise requires, the definitions mentioned in the Companies Act, 2013, shall apply to this CSR Policy:

a. "Act" means Companies Act, 1956/Companies Act, 2013 (as applicable), as amended and modified from time to time.

b. "Board" or "Board of Directors" means the board of directors of the Company.

c. "Company" means Lapis India Capital Advisors Private Limited.

d. "CSR" means Corporate Social Responsibility.

e. "CSR Regulations" means Section 135 of the Act (as amended from time to time), the CSR Rules (as amended from time to time) and the notifications and circulars issued by the Ministry of Corporate Affairs from time to time collectively.

f. "On-going Project" means a multi-year project, stretching over more than one financial year; having a timeline not exceeding three years excluding the year of commencement. Includes such projects that were initially not approved as multi-year projects but whose duration has been extended beyond one year by the Board based on reasonable justification

g. "Policy" or "This Policy" means the CSR Policy of the Company, as amended from time to time.

This Corporate Social Responsibility Policy ("CSR Policy") has been framed by Lapis India Capital Advisors Private Limited (the Company) in accordance with Section 135, Schedule VII of the Companies Act, 2013, and the rules made therein.

Unless the context otherwise requires, the definitions mentioned in the Companies Act 2013, shall apply to this CSR Policy.

INTRODUCTION:

Corporate Social Responsibility ("CSR") is the commitment of companies to provide resources and support activities focused on enhancing economic and social development. It is the effort made by companies to improve the living conditions of the local area in which they operate and the society at large. The activities taken up as a part of corporate social responsibility reflect the intent to create a positive impact on society without seeking any commensurate monetary benefits.

CSR has been a long-standing commitment at Lapis India Capital Advisors Private Limited (“Company”) and forms an integral part of our activities. Being a responsible corporate citizen, the Company is committed to performing its role towards society at large. In alignment with its vision, the Company always works towards adding value to society by going beyond business goals and contributing to the wellbeing of the community through CSR projects/programs, in true letter and spirit.

The initiatives taken by the Company are in accordance with projects/programs relating to activities specified under Schedule VII to the Companies Act, 2013 (“Act”) and Section 135 of the Companies Act, 2013.

OBJECTIVES OF THE POLICY:

The policy pertains to all activities undertaken by the Company towards fulfilling its corporate social responsibility objectives. The policy also ensures compliance with the provisions of Section 135 of the Companies Act, 2013, read with Schedule VII of the Companies Act, 2013, and Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time, and the notifications and circulars issued by the Ministry of Corporate Affairs from time to time.

The main objectives of the CSR Policy are as follows:

- To make CSR a key focus area for Lapis India Capital Advisors Private Limited and to ensure that the Company adheres to the legal framework in both letter and spirit

- To support initiatives that will enhance the quality of life and economic well-being of the communities in which we operate and society at large, by one or more of the focus areas as outlined in Schedule VII to the Companies Act, 2013.

- To generate goodwill and recognition among all stakeholders of the Company.

CSR Vision Statement & Objective

Vision

"Strategic partnerships and solutions for long-term sustainable impact, in the context of Indian Society."

Our CSR vision in India is to set industry standards and establish models of strategic, sustainable, and scalable solutions in the context of Indian society, helping beneficiaries attain their full potential.

Objectives

1. Environment: As a primary responsibility to sustain and build society, the Company will drive measurable environmental improvement initiatives like forestry, water, etc., to reduce our carbon footprint in the areas we operate in.
2. Education: The Company will make a significant contribution to improving the quality of education by establishing successful models in under-served institutions through innovation and technology in the communities we operate in, while also exploring collaborations with various academic institutions to support programs such as scholarships for students from economically weaker sections and other similar, relevant programs identified.
3. Gender & Skills: The Company intends to be recognized as a champion of diversity in the community in which we operate and create models of excellence for training women.
4. Health & Sanitation: This is among the most basic needs for good quality of human life. The Company will therefore address this in regions where it has operations, to ensure better access to programs in health and sanitation through effective CSR initiatives.
5. Livelihoods: Economic independence can be achieved through sustainable livelihood programs. The Company will create such programs based on effective needs assessment in the regions identified, ensuring long-term positive impact on our beneficiaries.

The Company will also be responsive to the social needs at times of natural calamities, disasters, and pandemics.

Guiding Principles for Onboarding Implementation Partners:

The implementation partners will be onboarded based on:

- their previous track record
- their credibility
- possession of all requisite documentation as mandated by the Ministry of Corporate Affairs (hereinafter referred to as "MCA"); and
- based on their abilities to customize, offer, and having been found equipped to deliver CSR projects and programs we wish to implement in the region.

CSR Project and Implementation and Monitoring Strategy:

During the initial phase of the project, a clear vision for each project is identified. With the execution partner, a strategic plan and desired outcome are discussed. On that basis, clear objectives are created. These objectives define the activities of the project, which are put into an execution plan to achieve the desired results. The execution plan of each project is monitored and reported from time to time.