

**CORPORATE SOCIAL RESPONSIBILITY POLICY**  
**OF**  
**SHAREKHAN LIMITED**

Version 1 adopted on February 28, 2025

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## **ABOUT MIRAE ASSET**

Mirae Asset Financial Group is a South Korean multinational financial services company headquartered in Seoul, South Korea. Mirae Asset provides comprehensive financial services including asset management, wealth management, investment banking, and life insurance. Mirae Asset has a global presence in Australia, Brazil, Canada, Mainland China, Hong Kong, Colombia, India, Indonesia, Japan, Korea, Mongolia, Singapore, the United Kingdom, the United States, and Vietnam. Since its inception, Mirae Asset has been on a path of innovation and have been identifying investment opportunities in the midst of change and delivering them with competitive financial products and services. Mirae Asset continues to invest and innovate toward the future, away from the stagnant past and familiar present.

## **ABOUT SHAREKHAN**

Founded in the year 1995, Sharekhan is a wholly owned subsidiary of Mirae Asset Capital Markets (India) Private Limited since November 2024. Sharekhan was one of the first brokers to introduce online trading in India. Sharekhan is one of the largest independent full-service brokers in India. What differentiates Sharekhan from discount brokers is its in-house expert Research team, RMs, and branches that are designed to help customers understand the required serious approach and leverage the power of our experience and expertise. Sharekhan offers a comprehensive range of trading and investment solutions, including equities, futures and options, portfolio management services, research, mutual funds. Sharekhan also has a dedicated education and training courses for investors and traders.

## **DEFINITIONS**

- i) “Act” means the Companies Act, 2013.
- ii) “Company” means Sharekhan Limited.
- iii) “Board of Directors” or “Board” means the collective body of the directors of the company.
- iv) “CSR Committee” means Corporate Social Responsibility Committee constituted by the Board of Directors of the Company.
- v) “CSR Policy” means Policy formulated by the Company containing the approach and direction given by the Board of the Company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.
- vi) “CSR Rules” means the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.
- vii) “Corporate Social Responsibility (CSR)” means the activities undertaken by a Company in pursuance of its statutory obligation laid down in Section 135 of the Act in accordance with the provisions contained in CSR rules,
- viii) “Implementing Agency” means Mirae Asset Foundation or such other entity registered with Ministry of Corporate Affairs for undertaking CSR projects, which is engaged by the Company to implement various projects in pursuance of CSR Policy.

- ix) “Net Profit” shall not include such sums as may be prescribed and shall be calculated in accordance with the provisions of Section 198 of the Act and clause (h) of Rule 2 of CSR Rules.
- x) “Ongoing Project” means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding Three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification;
- xi) “Administrative overheads” means the expenses incurred by the Company for ‘general management and administration’ of Corporate Social Responsibility functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring and evaluation of a particular Corporate Social Responsibility project or programme;

Words and expressions used and not defined in these rules but defined in the Act shall have the same meanings respectively assigned to them under the Act and CSR Rules as applicable to the Company.

## **INTRODUCTION TO CSR**

Corporate Social Responsibility (“CSR”) is a Broad term used to describe a company’s efforts to improve society in some way. These efforts can range from donating money to non-profits to implementing environment friendly policies. The activities taken up as part of corporate social responsibility reflect the intent to create a positive impact on society without seeking any commensurate monetary benefits.

The Company’s objective is to pro-actively support meaningful socio-economic development in India and enable a larger number of people to participate in and benefit from India’s economic progress. This is based on the belief that growth and development are effective only when they result in wider access to opportunities and benefit a broader section of the society.

This Corporate Social Responsibility Policy (“CSR Policy” or “Policy”) of the Company sets out the framework guiding the Company’s CSR activities. The Policy also sets out the rules that need to be adhered to while taking up and implementing CSR activities.

## **BACKGROUND TO CSR POLICY**

As per sub-section (1) of Section 135 of the Act, every company having net worth of Rupees Five Hundred Crore or more, or turnover of rupees One Thousand crore or more or a net profit of Rupees Five Crore or more during the immediately preceding financial year shall constitute a Corporate Social Responsibility Committee of the Board consisting of Three or more directors, out of which at least one director shall be an independent director.

Further, sub-section (5) of Section 135 of the Act provides that the Board of every company referred to in sub-section (1) of Section 135, shall ensure that the Company spends, in every financial year, at least Two per cent. of the average net profits of the Company made during the Three immediately preceding financial years in pursuance of its Corporate Social Responsibility Policy. Provided that the Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility activities.

This CSR policy of the Company is formulated pursuant to clause (a) of sub-section 3 of Section 135 of the Act and rules made thereunder and other applicable laws to the Company. Further, this policy sets out the framework, guiding the Company’s CSR activities and the rules that needs to be adhered to while taking up

and implementing CSR activities. Through this CSR Policy, the Company proposes to adopt short / medium / long term CSR programs and initiatives.

The activities enlisted in this CSR Policy are aligned with the Mirae Asset group CSR Policy and are carried out by the Company either individually or in association with eligible Implementing Agencies registered with the Ministry of Corporate Affairs.

## **GUIDING PRINCIPLES, APPROACH AND DIRECTION OF CSR**

It is the Company’s commitment to ensure that its activities extend beyond business and include initiatives and endeavours for the benefit and development of the community / society. The Company’s CSR initiatives are aligned with the principles to serve a social purpose, education, skill development, sustainable development of the society and benefit to the needy.

Any other permitted activities to be undertaken by the Company may be selected, implemented and monitored while considering these guiding principles, approach and direction.

To achieve the Company’s vision of strengthening education systems in India and create social value, a 4 pillared strategy would be followed through sustainable, intelligent ‘Human Centred Investment’.

## **EDUCATION**



### **Scholarships**

- Rewarding high achievers and promoting excellence in education in India.
- Providing opportunities to disadvantaged students to pursue their dreams.
- Recognizing student achievements and leadership.

### **Research and Innovation**

- Fostering discovery and building of knowledge.
- Finding solutions to problems in educational development.
- Rendering cost effective and scalable educational solutions.

### **Learning Outcomes**

- Improving conditions which affect student’s learning and skill development.
- Developing critical thinking and problem-solving capabilities of young learners.
- Establishing systems which cater and to nurture students with different levels of aptitude.

### **Technological and Educational Infrastructure**

- Creating a conducive ecosystem for learning.
- Integrating cutting edge technology and classroom learning.
- Improving access to education for all.

### **ARTS & CULTURE**

#### **Native Arts & Crafts**

- Preservation & conservation of local forms of Arts, Crafts, & Language;
- Preservation of native traditional Dance, Music & Musical instruments.

#### **Support Artists & Artisans & Arthouses**

- Promotion of literary, visual and performing arts and support book publications / cultural institutions;
- Support programs that help artists & artisans involved in sustaining, restoring or reviving arts / crafts forms.

### **ENVIRONMENT**

#### **Combat Climate Change**

- Support programs to combat Climate Change and improve bio-diversity
- Aid initiatives that help preservation of landscapes, waterbodies and the resultant bio-diversity.

#### **Renewable resources & Water Conservation**

- Support projects related to Solar, Rain Water harvesting, Wind power – and any such renewable / sustainable energy sources.
- Promote initiatives that aims at building / reviving water bodies.

#### **Awareness Campaigns**

- Community projects
- Sustainable / Green initiatives

### **RELIEF & RESCUE**

#### **Natural Calamity, Pandemic or Epidemic**

- Support people affected due to natural calamities such as flood, earthquake etc.
- Help rehabilitation of affected population esp. children, women & their families.
- Support Hospitals, Migrants & marginalized community, Women/Girls & the Youth and aid digital education.

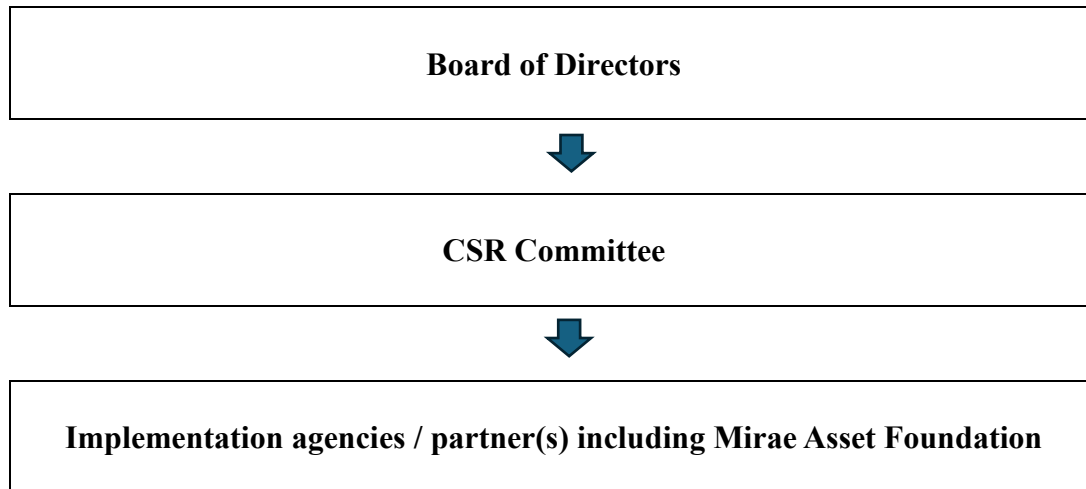
### **OTHERS**

Contribution to Prime Minister's National Relief Fund or any other fund set up by the Central Government or any other areas as may be prescribed under Schedule VII of the Companies Act, 2013.

### **PERMISSIBLE AREAS OF CSR ACTIVITIES**

The CSR activities of the Company shall be undertaken in areas identified by the CSR Committee. Such activities identified by the CSR Committee of the Company and include projects related to Education, Arts & culture, Environment, Relief & rescue and any other activities as enumerated in Schedule VII of the Act, as amended from time to time, including activities permitted by MCA / ROC through various notifications, circulars, rules, etc.

## GOVERNANCE STRUCTURE OF CSR



## COMPOSITION OF CSR COMMITTEE

As per sub-section (1) of Section 135 of the Act, every company having net worth of rupees five hundred crore or more, or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during the immediately preceding financial year shall constitute a Corporate Social Responsibility Committee of the Board consisting of three or more directors, out of which at least one director shall be an independent director. Accordingly, the composition of the CSR Committee of the Company is as under:

Sr. No.	Name	Designation/Category
1	Mr. Yogesh Chadha	Independent Director/ Member
2	Mr. Jisang Yoo	Executive Director and CEO/ Member
3	Mr. Ritesh Patel	Whole Time Director and CRO/ Member

## ROLE AND RESPONSIBILITIES OF CSR COMMITTEE

The Corporate Social Responsibility Committee shall:

- (i) formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII;
- (ii) recommend the amount of expenditure to be incurred on the activities referred to in clause (i); and
- (iii) monitor the Corporate Social Responsibility Policy of the company from time to time;
- (iv) formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely: -
  - (a) the list of CSR projects or programmes that, are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
  - (b) the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
  - (c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
  - (d) monitoring and reporting mechanism for the projects or programmes; and
  - (e) details of need and impact assessment, if any, for the projects undertaken by the Company.
- (v) Recommend changes to the Board, if any, needed in the annual action plan with reasonable justification to that effect;

- (vi) To monitor the CSR Policy as approved by the Board from time to time.

The CSR Committee should recommend the approach and direction of CSR activities to be undertaken by the Company and provide guiding principles for:

- (i) Selection of CSR projects / programmes / activities;
- (ii) Implementation of CSR projects / programmes / activities;
- (iii) Monitoring of CSR projects / programmes / activities;
- (iv) Formulation of the annual action plan.

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

## **ROLE AND RESPONSIBILITIES OF THE BOARD**

The Board of every company referred to in sub-section (1) of Section 135 shall:

- (i) after taking into account the recommendations made by the Corporate Social Responsibility Committee, approve the Corporate Social Responsibility Policy for the Company and disclose contents of such Policy in its report and also place it on the Company's website, if any, in such manner as may be prescribed; and
- (ii) ensure that the activities as are included in Corporate Social Responsibility Policy of the Company are undertaken by the Company.
- (iii) satisfy itself that the funds disbursed for CSR activities have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- (iv) in case of ongoing project, shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- (v) ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.
- (vi) ensure that the Board's Report of a company covered under sub-section (3) of section 134 and CSR rules pertaining to any financial year shall include composition of the Corporate Social Responsibility Committee along with an annual report on CSR containing particulars as specified in CSR Rules.
- (vii) mandatorily disclose the composition of the CSR Committee, and CSR Policy and Projects approved by the Board on their website, if any, for public access.

## **CSR BUDGET AND EXPENDITURE**

The Company shall endeavour to achieve the objectives of CSR Policy and allocate every year:

- (i) at least Two per cent. of the average net profits of the Company made during the Three immediately preceding financial years.

Provided that, the Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility activities. Provided further that, if the Company fails to spend such amount, the Board shall, in its report made under clause (o) of sub-section (3) of section 134, specify the reasons for not spending the amount and, unless the unspent amount relates to any ongoing project referred to in sub-section (6), transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.



- (ii) Any amount remaining unspent under sub-section (5) of Section 135 of the Act, pursuant to any ongoing project, fulfilling such conditions as may be prescribed, undertaken by a company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the Company within a period of Thirty days from the end of the financial year to a special account to be opened by the Company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the Company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of Three financial years from the date of such transfer, failing which, the Company shall transfer the same to a Fund specified in Schedule VII, within a period of Thirty days from the date of completion of the third financial year.
- (iii) Until a fund is specified in Schedule VII for the purposes of subsection (5) and (6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the Company to any fund included in schedule VII of the Act.
- (iv) Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of Six months of the expiry of the financial year.
- (v) Where the Company spends an amount in excess of requirement provided under sub-section (5) of section 135, such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years subject to the conditions that –
  - (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of clause (iii) above
  - (ii) the Board of the company shall pass a resolution to that effect.
  - (iii) All the expenditure relating to CSR shall be pre-approved by the CSR Committee. The CFO shall monitor the utilization of funds for the purposes set forth and certify to this effect.

## IMPLEMENTATION OF CSR

- (i) CSR programs, projects or activities of the company should be implemented through following methods:
  - a) Directly by the Company;
  - b) Implementing Agencies;
  - c) Any foundation, including Mirae Asset Foundation or any other body incorporated by the Company and eligible to undertake such CSR projects.
  - d) in collaboration with other organizations / group companies
- (ii) The Board shall ensure that the CSR activities are undertaken by the Company itself or through-
  - (a) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the Company, either singly or along with any other company, or
  - (b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
  - (c) any entity established under an Act of Parliament or a State legislature; or
  - (d) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

While the Company can engage suitable Implementing Agencies to undertake approved CSR projects. The Company can also partner with local governance bodies, such as Gram Panchayats, Civic Bodies, Municipality to directly undertake approved CSR projects with the help and support of these bodies.

- (iii) The Board shall be responsible for implementing the mandate of the CSR Policy and shall ensure that, the CSR Activities are carried out in accordance with the CSR Policy read with the Act and CSR Rules and the annual action plan formulated and recommended by the CSR Committee.
- (iv) The Company shall implement its CSR activities through Mirae Asset Foundation (“MAF”). MAF is a Company established under Section 8 of the Companies Act, 2013 and is registered under Section 12A and 80 G of the Income Tax Act, 1961 and has filed Form CSR-1 with the Registrar of Companies and holds a valid CSR Registration Number to that effect. From the date of adoption of this policy, project(s) approved by the Board of the Company for CSR Expenditure shall be implemented through MAF. The Board/ CSR Committee is authorised to continue to implement CSR activities directly and/ or through MAF as Implementation Agency and/ or any other implementation agency or in any manner as permitted under the applicable laws from time to time. The Board has the authority to change the Implementation Agency from time to time or appoint one or more other permitted implementation agencies.

## **IMPACT ASSESSMENT**

If the Company is having average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Act, in the three immediately preceding financial years, it shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.

In case the Company is undertaking impact assessment, it may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed Two percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is higher.

## **CAPITAL ASSETS**

- (i) The CSR amount may be spent by a company for creation or acquisition of a capital asset, which shall be held by –
  - (a) a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number under sub-rule (2) of rule 4; or
  - (b) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
  - (c) a public authority
- (ii) Capital asset acquired or created by CSR projects, if any, should be held by the beneficiaries of the said CSR project or a trust or a public authority for the benefits of all. The Company should take appropriate measure to ensure that such assets are utilized for the purpose it was meant for and should not be transferred or disposed off without prior permission of the Company.

## **AMENDMENTS TO THE POLICY**

The Board of Directors on its own and/ or on the recommendation of CSR Committee, may amend this CSR policy as and when required. Any or all provisions of CSR Policy would be subjected to revision / amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time. Any changes in law shall be deemed to have been incorporated in this Policy and eligible/ applicable to the Company.