

CORPORATE SOCIAL RESPONSIBILITY
(CSR) POLICY OF ESTEE ADVISORS
PRIVATE LIMITED

21st May, 2021

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1. INTRODUCTION

Estee Advisors Private Limited (Formerly Known as Estee Fincap Private Limited) (hereinafter referred to as the “Company”), a company incorporated in Gurugram, Haryana, India is a quant-based investment management and execution services provider. It was incorporated in July 2019. Estee is a pioneer in building algorithmic investment products and has a strong track record as an investment manager and trade execution services provider in Indian capital markets. Estee is present across three lines of business - Asset Management, Proprietary Trading, and Execution Services.

2. OBJECTIVE & SCOPE

- This is the Corporate Social Responsibility Policy (“CSR Policy”) for the Company as required under the Companies Act, 2013 (hereafter referred to as “the Act”), read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 and other directions and clarifications issued from time to time (collectively referred to as the “CSR Regulations”). This policy lays down broad guidelines and principles for the Company’s activities in the sphere of corporate social responsibility undertaken in India.
- The Company is committed towards the society, serving through long term value creation for all stakeholders. The company shall positively impact and influence its employees and partners in fostering a sense of social commitment for their stakeholders.
- CSR Focus Areas and Geographic Spread: The Company will focus on four thrust areas – Education, Health, Livelihoods and Rural and Urban infrastructure. Besides, it will also undertake CSR Interventions in the areas of sports, disaster relief, environment and ethnicity etc., all aimed at improving the quality of life of the communities. CSR activities will be undertaken in urban as well as rural areas within the territory of India, as approved by the CSR Committee of the Board from time to time. While it will be ensured that all communities benefit from its CSR activities, the Company would focus on those groups that are socially and economically marginalized.

3. CSR COMMITTEE OF THE BOARD

3.1 Constitution and Governance Mechanism

- The Board of Directors of the Company shall constitute the Corporate Social Responsibility Committee of the Board (“CSR Committee”), as required under the Companies Act, 2013 and in compliance with the CSR Regulations. The members of CSR Committee shall be appointed by the Board of Directors of the Company and shall consist of at least three Directors of the Company. The composition of the CSR Committee is as below:

Mr. Sandeep Tyagi - (Executive, Non-independent Director) – Chairman

Mr. Umesh Kumar - (Executive, Non-independent Director) – Member

Mr. Shalabh Rakyan - (Executive, Non-independent Director) – Member

- The CSR Committee will govern and review the CSR policy of the company from time to time. The CSR Committee will recommend the Annual Business Plan for CSR (**Annexure A**) to the Board for its approval. The plan will include resource requirements and allocation across CSR Interventions and locations.
- The CSR Committee will do a yearly review of the activities and monitor achievements against targets set at the beginning of the year and may hold meetings as per their requirements. The CSR Committee may employ consultants to monitor the progress on the CSR initiatives of the Company.

3.2 Powers of the CSR Committee

The CSR Committee shall assist the Board of Directors in implementing the CSR Regulations and the CSR Policy, and shall also:

- (i) Formulate and revise the Company’s CSR Policy and recommend the same to the Board of Directors of the Company for approval and adoption;
- (ii) Recommend CSR activities as stated under Schedule VII of the Act;
- (iii) Recommend the amount of expenditure to be incurred on the CSR activities;
- (iv) Create a transparent monitoring mechanism for implementation of CSR initiatives in India;

- (v) Prepare and submit periodic reports to the Board of Directors in respect of the CSR activities undertaken by the Company;
- (vi) Authorize executives of the Company to attend the CSR Committee Meetings;
- (vii) Ensure that the surplus arising out of CSR projects or programs, or activities shall not form part of the business profit of the company.

4. CSR ACTIVITIES AND PERFORMANCE

The Company shall undertake CSR activities as recommended by the CSR Committee and in accordance with Schedule VII of the Companies Act, 2013 and the directions and clarifications issued by the Ministry of Corporate Affairs from time to time in this regard (“CSR Interventions”). Such CSR activities may be undertaken in collaboration with other credible organizations as may be recommended by the CSR Committee from time to time based on well-defined selection criteria. The Committee is authorized to approve any modification to the existing CSR activities or to propose any new activity during the relevant financial year.

5. POLICY REVIEW

The Committee shall annually review its CSR Policy or from time to time as may be considered necessary and make suitable changes as may be required and submit the same for the approval by the Board of Directors of the Company.

6. COMPLIANCE STATEMENT

The CSR policy of the company shall be approved by the CSR Committee of the Company, subject to final approval by Board of Directors, for adoption as the company’s CSR policy. The contents of this policy shall be appropriately disclosed in the Board report in accordance with the requirements of the Companies Act, 2013, and the rules and regulations framed thereunder.

In compliance with the requirements of the Companies Act, 2013 it is confirmed that –

- a copy of this policy will be placed on the Company’s website / internal portal, as may be available and
- or programs;

- The composition of CSR Committee;
- Average or net profit of the Company for last three financial years;
- Prescribed CSR Expenditure (2% of the amount of the net profit for the last 3 financial years),
- Details of CSR spent during the financial year;
- In case the Company has failed to spend 2% of the average net profit of the last three financial years, reasons thereof;
- any surplus arising out of the CSR projects, programs or activities shall be re-deployed back into CSR activities and shall not form part of the business profit of the company.

ANNEXURE A: CSR PLAN FOR FY 2021-22

OBJECTIVE	MEANS	SCHEDULE VII	MODALITY OF IMPLEMENTATION/ PARTNERS
Education	<p>Provide infrastructure and other support to schools. Help monitoring quality of education for primary school students. Provide support to the children by conducting classes on various subjects' viz., emotional education, social education etc. Primary Learning, Spoken English and soft Skills Development Programs Support</p>	(ii) / (i)	<p>Provide infrastructure and other support to schools, educational institutions etc., Estee Advisors Pvt. Ltd., Select Partners</p>
Health	<p>Provide medical help to animals by running programs etc. Promoting awareness on health issues, promoting health by conducting camps etc. at various unorganized locations Provide direct support to the serious patients for saving lives, for the welfare of mankind. Provide financial assistance and waivers for needy patients, on a case-to-case basis. Provide medical instruments.</p>	(i)	<p>Estee Advisors Pvt. Ltd., Select Partners</p>
Livelihoods	<p>Provide shelter, food and other support to elderly people. Provide shelter to mentally retarded adult people with facilities separately for male and female. Support Youth to undergo skill development programs. Women empowerment</p>	(ii)	<p>Estee Advisors Pvt. Ltd., Select Partners</p>
Disaster Relief	<p>Provide medical and other support to the needy people during any disaster. Provide food and temporary shelter to the needy people during disaster. Provide reliable and need based timely relief in both rural and urban areas with a diversified network.</p>	<p>Coverage under Schedule VII to be categorized according to the activity undertaken</p>	<p>Estee Advisors Pvt. Ltd., Select Partners</p>

Environment	<p>Install solar lights and encourage people for the same.</p> <p>Promote plantation in schools and other places for increasing green cover area.</p> <p>Promote the protection of flora and fauna.</p>	(iv)	Estee Advisors Pvt. Ltd., Select Partners
Poverty Eradication	<p>Provide support to mankind living in backward areas and giving them a means to earn their bread and butter.</p> <p>Provide training to transform waste materials into useful things.</p> <p>Arrange camps for skill development to people and teach them to earn with these skills</p>	(i)	Estee Advisors Pvt. Ltd., Select Partners