

Corporate Social Responsibility Policy



Classification: Public

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Preamble

Corporate Social Responsibility (“CSR”) is the continuing commitment by business to behave ethically and contribute to economic development while improving the quality of life of the local community and society at large. Businesses derive their primary benefits from operating in society and no business can function without caring for societal and community development. TresVista Financial Services Private Limited’ (hereinafter referred to as “TresVista” or “Company”) CSR Policy (hereinafter referred to as ‘the Policy’) has been developed in accordance with Section 135 of the Companies Act, 2013 (with its amendments, “Act”) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (with its amendments, “Rules”) notified by the Ministry of Corporate Affairs, Government of India.

Introduction

“We make a living by what we get, but we make a life by what we give” – Winston Churchill

“Creating a strong business and building a better world are not conflicting goals – they are both essential ingredients for long-term success” – Bill Ford

“It’s not how much we give, but how much love we put into giving.” – Mother Teresa

Since its inception, TresVista has been committed to serving the community to which it belongs. The founders appreciate that the proper functioning and improvement of a society requires its employees, both as individuals and as corporate citizens, to not only take responsibility but also action.

TresVista strives to work towards community development and areas needing focus and attention. Being a leading global professional services provider, TresVista believes that this position brings both opportunity and responsibility. TresVista believes in applying its skills and resources where it can make the greatest impact on the society. This belief is entwined in all the CSR programs at TresVista, and the same is accomplished through a skill-based approach, driving meaningful change in the community by establishing CSR program initiatives.

As a socially responsible company, TresVista contributes to society by providing services based on the needs of customers and society and through dialogue with its stakeholders. The CSR program further endeavors to achieve the shared values of TresVista, (PACT – People, Action, Clients, and Team) and upholds the principles of Code of Ethics and Professional Conduct of TresVista.

Objective

This Policy defines the governance for all CSR-related activities by TresVista, in order to maximize the benefits for the society. The broad objectives are to:

- Specify focus areas for CSR activities
- Ensure compliant execution of all CSR activities
- Establish location-wise standards and implementation strategy for planning and implementation of CSR activities

Employee Engagement

TresVista's CSR program allows the employees to be involved via:

- **CSR Volunteering (skill-based support):** Employees can pick up projects outlined in the CSR program, allowing them to work directly with social entrepreneurs and social organizations on a pro-bono basis and hence directly impact their business activities. TresVista actively partners with organizations that promote social investment and entrepreneurship, whereby TresVista's team members can leverage their financial and other skills for the benefit of NGOs and social entrepreneurs
- **CSR Events (time-based support):** TresVista periodically organizes community service events at the Company level, wherein all employees are mandated to participate
- **Donations:** TresVista periodically uses the CSR Budget ("Budget") to give monetary donations to specific causes as well as priority projects that confirm our commitment to impact the community

The small changes that can be made and witnessed, allow TresVista's employees to become more engaged and committed towards donating time and money for socially valuable causes.

Focus Areas for CSR Initiatives

The intent of TresVista, as a responsible corporate citizen, is to ensure that CSR is used as a tool to integrate economic, environmental, and social objectives with Company's operations and growth, by contributing through one or more of the below stated CSR activities:

- Eradicating hunger, poverty and malnutrition, and sanitation and making available safe drinking water
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects
- 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
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources, and maintaining the quality of soil, air, and water
- 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
- Measures for the benefit of armed forces veterans, war widows, and their dependents
- Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports
- Contribution to the prime minister's national relief fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women
- 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

- public funded educational Universities and other bodies engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals
- Rural development projects
- Slum area development
- Disaster management, including relief, rehabilitation and reconstruction activities
- Undertaking other need-based initiatives in compliance with Schedule VII the Act
- Such other activities as may be specified under the Act or Rules from time to time
- CSR activities shall not include:
 - Activities undertaken by TresVista during the normal course of its business
 - Projects or programs or activities that benefit only the employees of the Company and their families
 - Activity undertaken by the Company outside India **except** for training of Indian sports employees representing at national or international level
 - Activities carried out for the fulfilment of any statutory obligation under any law in force in India
 - Contribution of any amount directly or indirectly to any political party under section 182 of the Act
 - Activities supported by the Company on sponsorship basis for deriving marketing benefits for its products or services

Implementation Process

TresVista will undertake CSR activities as projects or programs or activities, excluding activities undertaken in pursuance of the normal course of business in any of the following manner:

- Directly by TresVista through its employees or through a registered trust or a registered society or a company established by TresVista or through its associate company under section 8 of the Act or any associate concerns or otherwise
- Through 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
- Through any entity established under an act of Parliament or a State legislature
- Through a company established under Section 8 of the Act, or a registered public trust or a registered society, and having an established track record of at least three years in undertaking similar activities, where the Company shall specify the projects or programs to be undertaken, the modalities of utilisation of funds of such projects and programs and the monitoring and reporting mechanism
- Partnering with other organizations/institutions who specialize in such projects
- Engaging the services of specialized agencies to implement the projects

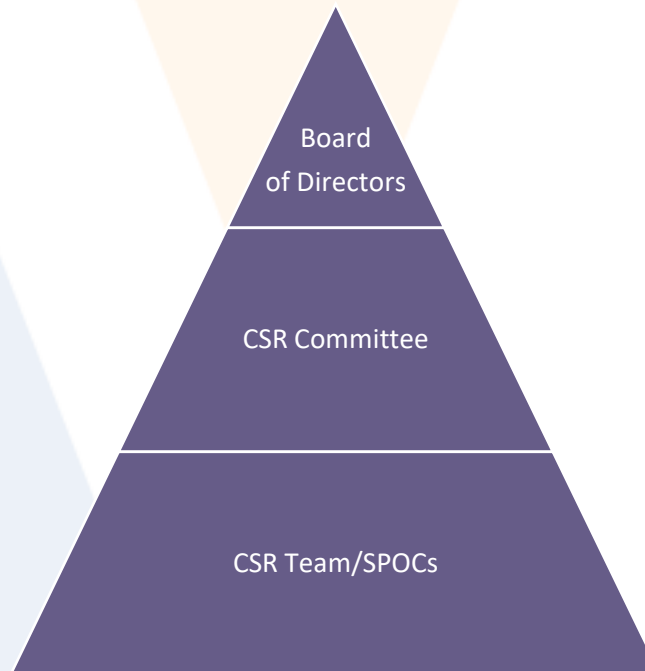
Local Area

TresVista is based out of Mumbai, Maharashtra. Although the term Local Area referred to in the Act has not been defined in the Act, TresVista's geographical reach would include Maharashtra.

The term Local Area must be seen in a broad sense of understanding. If any CSR activities are aligned with our CSR Vision, then we would take up the project anywhere within India.

The CSR Committee (the “Committee”)

- The Board of Directors (“Board”) of TresVista have constituted a CSR Committee as per the provisions of the Act and the Rules
- The Committee will comprise of 3 senior members (with a minimum of two directors) of TresVista and may change every two (2) years



Role of the Board

- The Board shall constitute a CSR Committee
- The Board shall additionally oversee the below:
 - Ensure the composition of the Committee is disclosed on the Company’s website
 - After taking into account the recommendations made by the Committee (as constituted above), approve the CSR Policy for the Company and disclose the contents of such Policy on Company’s website in such manner as may be prescribed
 - Ensure that the activities included in the CSR Policy are in compliance with the activities in Schedule VII of the Act
 - Ensure that the activities, as are included in CSR Policy of the Company, are undertaken by the Company
 - Fund disbursed for CSR is utilized in the approved manner and the person responsible for financial management must certify it
 - Ensure that the administrative overheads shall not exceed 5% of total CSR expenditure of the Company for a given FY (defined below)
 - Monitor all the CSR project for their timely completion and smooth implementation

Responsibilities of the Committee

- To formulate this CSR Policy indicating the activities to be undertaken by TresVista
- To implement and take decisions in respect of the CSR Policy along with the Team (defined below)
- To formulate and recommend to the Board, an annual action plan in pursuance of this Policy which shall include the following:
 - a list of approved CSR programmes / projects and its manner of execution
 - modalities of utilisation of funds and implementation schedules
 - monitoring and reporting mechanism
 - details of need and impact assessment, if any, for the projects undertaken
- To monitor the implementation of the CSR projects, programs and activities from time to time and issue suitable directions to the Team
- To review and recommend the amount of expenditure to be incurred on the CSR activities to be undertaken by the Company
- To institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company;
- To prioritise the activities to be undertaken for CSR
- To hold at least two meetings every year for reviewing the implementation of the CSR Policy and report their findings/views to the Board
- To review the CSR Policy from time to time and suggest modifications, if required

The CSR Team (the “Team”)

- The Team consists of the volunteers (which may change from time to time) who report to the supervisor (“Team Head(s)/SPOC”)
- The Team Head(s)/SPOC then reports to the Committee

Responsibilities of the Team

- Execution of the decisions taken by the Committee
- Project execution
- Communication with partners and volunteers
- Implementation and impact assessment
- Report periodically to the Committee
- Conduct weekly meeting to review progress and decide an agenda
- Conduct a yearly event which is attended by the volunteers and the partners. The aim is to give them an update on the progress of the initiative and forward-looking goals

Programs under the Policy

- In accordance with Schedule VII of the Act and the Rules, TresVista shall undertake CSR activities included in its plan for that year, as recommended by the Committee at the beginning of each Financial Year (“FY”). The Committee is authorized to approve any modification to the existing CSR plan or to propose any new program during the FY under review

- The CSR programs planned for the year will be reviewed annually during April/May of each FY by the Team, and then presented to the Committee, which in turn shall present the annual agenda to the Board, for adoption and approval for each FY. The Committee will follow a due diligence process before formulating any annual CSR plan
- Inter alia, some of the signature year-round programs where TresVista involves itself are as follows:
 - **CSR Day:** Leverage TresVista employee's intellectual skills to define and create a meaningful impact within the community
 - **Donations:** Firm donations for strategic priority projects to confirm TresVista's commitment to impact the community
 - **Volunteering:** Leverage TresVista employee's skills and competencies in taking up social entrepreneurs projects on a pro-bono basis to improve their business practice
 - **Knowledge Sessions:** Deliver state-of-the-art knowledge sessions to empower non-profit organizations and help them enhance their core competencies and expertise
 - **CSR Engagement Events:** Tying up with NGOs and conducting community service initiatives that benefit the society and engage employees

CSR Budget

TresVista sets up a formalized Budget every year for its CSR activities which is leveraged in opportunities which the Company finds appropriate. The Board ensures that in each FY, at least two percent of the average net profit (calculated as per Section 198 of the Act) accrued during the three immediately preceding FYs, is spent on CSR activities / projects / programs.

Salaries paid by the Company to regular CSR staff as well as to volunteers of the Company (in proportion to Company's time/hours spent specifically on CSR activities aligned with the annual CSR plan) can be factored into CSR project cost (as part of the CSR expenditure) and shall not exceed 5% of the total CSR budget in a given FY

Reporting and Monitoring

The Team will collaborate with stakeholders to monitor the status of each project and will report its findings to the Committee periodically. The Committee will review the progress on the CSR initiatives, monitor the expenditure for the FY and discuss the budgetary utilization on a periodical basis. The Committee will also present the progress periodically to the Board.

In order to ensure that the Budget gets properly utilized for the earmarked projects, the Team may also nominate two or more employees to monitor the implementation of those projects, depending on its scale. The monitoring and reporting mechanism will include program review, evaluation and documentation.

The annual report on CSR will include the following disclosures:

- Details regarding meetings of the Committee
- Details of impact assessment of CSR projects
- Set-off of any excess CSR amounts against future CSR obligations
- Amount spent on administrative overheads, impact assessment, if applicable, and on on-going projects, etc.

Treatment of Surplus and Unspent Amount

Any surplus or profits made by the Company in carrying out its CSR activities does not form part of the business profit supply and shall either be invested back into CSR activities or shall be transferred to the Unspent CSR Account (defined below) and spent in pursuance of CSR Policy and an annual action plan of the Company, or shall be transferred to a fund (Clean Ganga Fund, PM National Relief Fund, PM Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund), or other funds, as prescribed by National/State Government) specified in Schedule VII, within a period of six (6) months from the end of the FY.

If any amount remains unspent pursuant to any ongoing CSR project undertaken by the Company, such amount will be transferred within a period of thirty (30) days from the end of the FY to a special account (“Unspent CSR Account”) opened by TresVista in this behalf and such amount will be spent by TresVista in pursuance of its obligation towards the CSR Policy within a period of three FYs from the date of such transfer or to a fund (Clean Ganga Fund, PM National Relief Fund, PM Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or other fund, as prescribed by National/State Government) specified in Schedule VII, within a period of thirty (30) days from the date of completion of the third FY. The details and reasons for the unspent amount shall be reported in the annual report to the Board members.

The unspent CSR amount not related to any ongoing CSR project will be transferred to a fund (Clean Ganga Fund, PM National Relief Fund, PM Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or other fund, as prescribed by National/State Government) specified in Schedule VII, within a period of within a period of six (6) months of the expiry of the FY.

Contact

For queries related to the CSR Policy, please write to us at csr@tresvista.com.