

**CSR POLICY – Approved on 19.09.2022**

Corporate Social Responsibility (CSR) is a Company's commitment to its stake holders to conduct business in an economically, socially and environmentally sustainable manner that is transparent and ethical.

Our CSR policy is formulated by adhering to Section 135 of the Companies Act 2013, ("the Act") and we strive to commit ourselves to contribute to the society that we conduct our businesses, in a just and transparent manner. Our primary goal here is contribution to the community with a long term vision of socio economic development. The primary areas for development that we seek to contribute are — Education facilities for the poor, Healthcare, Development of sports and Environment.

A CSR Committee shall be formed in terms of the Act when it becomes mandatory for the Company to form such a Committee under the provisions of the Act. Till such time the Board shall discharge the responsibilities under the Act.

The indicative activities which are proposed to be undertaken by our Company under CSR have been specified below in accordance with Schedule VII of the Companies Act 2013. Such activities would be by and large for the following causes:

- Eradicating hunger and poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water;
- Promoting education including special education and employment enhancing vocation skills especially among children, woman, 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.
- Contribution to 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 scheduled castes, scheduled tribes, other backward classes, minorities and women.
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining of 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 arts and handicrafts;
- Measures for the benefit of armed forces veterans, war widows and their dependants;
- Training to promote rural sports, nationally recognised sports, Paralympics sports and Olympic sports;
- Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government. Rural development projects.
- Disaster Management: Disaster management including relief, rehabilitation, and reconstruction activities, supporting for Covid 19 relief measures. The above objectives are broad based and will be construed in a liberal manner within the framework of the Act.

Further to contributions towards any of the above causes, should there be any surplus arising out of CSR activities will be reinvested into CSR initiative and this will be over and above the 2% contribution.

**SPARK FAMILY OFFICE AND INVESTMENT ADVISORS (INDIA) PRIVATE LIMITED**

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The Company shall implement its CSR activities any of the following methods;

- Directly on its own;
- Through its own non-profit foundation set-up so as to facilitate this initiative;
- Through independently registered non-profit organisations that have a record of at least three years in similar such related activities;

Only CSR activities undertaken in India will be taken into consideration.

Activities meant exclusively for our employees and their families shall not qualify.

The Board of Directors shall mandatorily report on CSR in their report in the specified format in accordance to the Act. The report shall include activity-wise spending, and also reasons for spends under 2% of the average net profits of the previous three years computed in accordance with Section 198 of the Act and a responsibility statement that the CSR policy, implementation and monitoring process is in compliance with the CSR objectives, in letter and in spirit. This shall be signed by either the CEO or the Managing Director or any Director of the Company.