

Policy on Corporate Social Responsibility

Of

Zerodha Commodities Private Limited

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1. Brief Outline of CSR Policy.

The business philosophy and foundation of **Zerodha Commodities Private Limited** is built on the strong belief of excellence in the areas of economic, social and environmental development. The thrust of the business ideology is to go beyond the deployment of financial resources and be catalyst in societal, entrepreneurial and technological change which is intertwined closely with creativity, innovation and responsibility. In line with its ideology, the company shall contribute and participate in the Corporate Social Responsibility ("CSR") projects which can bring significant development and change in the lives and development of the local community and society at large.

2. Objectives of CSR Policy.

Zerodha Commodities Private Limited CSR Policy Intends to;

1. Engage the CSR Programmes in the areas of - enhancing rural development; promoting education; providing healthcare and medical facilities creating livelihoods for people, especially those from disadvantaged sections of society, in rural and urban India; preserving and promoting sports, Culture and science;
2. Contribute towards skill building and vocational training, to enhance employability and generate livelihoods for persons from local and disadvantaged sections of society;
3. Pursue Programmes in areas that are within the economic and local vicinity of the Company's operations to enable close supervision and ensure maximum development impact;
4. Govern and monitor the CSR activities of the Company on an on-going basis, and to modify and enhance the CSR activities and programme to make optimum impact.

3. Implementation.

The implementation of the Company's CSR programmes shall be through monetary contribution made to such institutions either as identified by the committee or through a registered trust established by the Company.

4. Composition of CSR Committee

The CSR Committee shall consist of the following directors;

Mr. Nithin Kamath, CEO, Chairperson

Mr. Nikhil Kamath,

Ms. Seema Shivaji Patil,

5. Governance

1. The CSR Committee shall review the implementation of the CSR Programmes and issue necessary directions for efficient execution of the Programmes and modify the policy as and when required with the approval of the Board.
2. The CSR Committee will place for the Board's approval, a CSR Plan describing the CSR Programmes to be carried out during the financial year and the specified budgets thereof. The Board will consider and approve the CSR Plan with or without any modification that may be deemed necessary.
3. The CSR Committee shall also update the Board about the status of such contribution/implementation at such interval as directed by the Board.
4. At the end of every financial year, the CSR Committee will submit its report to the Board.

6. CSR Expenditure

Pursuant to the provisions of the Companies Act, 2013, the Company shall allocate 2% of the average net profit of the Company made during the three immediate preceding financial years for its CSR activities.

CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Plan.

7. Conclusion

Over the past years, we have established a foundational framework for economic, social and environmental initiatives, within the organization as well as outside. As a responsible human organisation, we are committed towards the above objective and are keen on developing a sustainable business model to ensure and activate our future growth.