360 Z

## 360° Approach to Change

## **360 ONE WAM LIMITED**

## Sustainability Report 2023-24



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## MESSAGES FROM THE KEY PEOPLE



Akhil Gupta Chairperson 360 ONE WAM LIMITED

Dear Stakeholders,

Warm greetings!

It is my privilege to address you as the Chairperson of 360 ONE WAM LIMITED. Our commitment to excellence goes beyond wealth management. We strive to provide personalized guidance, independent insights, and expert-driven solutions that align with our clients' unique aspirations. Our approach is rooted in responsibility, innovation, steadfast and dedication for creating longterm value for our stakeholders.

We also firmly believe that financial services have the power to shape a better future, extending beyond economic value creation to address some of the world's pressing challenges. most Issues such as climate change, social and financial inclusion, advancement, technological and global development

require thoughtful actions. At 360 ONE, we are dedicated to leveraging our expertise and resources to drive meaningful change in such areas. We accordingly endeavour to make ESG considerations an integral part of our long-term vision, influencing the way we operate, invest, and create value for all stakeholders. By embedding sustainability into our core strategy, we aim to foster a positive impact on our planet, communities, and the economy while protecting the interests of those we serve.

This Sustainability Report highlights the proactive measures we have taken to enhance operational efficiency, strengthen governance, and create long term value our stakeholders. for For us upholding the legal and regulatory standards is not just a responsibility but a fundamental pillar of effective and ethical business practices. This report aims to demonstrate our continued commitment to sustainability and innovation. In recognition of our continued efforts, we received а corporate governance score of 63 from IiAS & ESG score of 78 from SES, and 65 from CRISIL, during FY 2023-24. These ratings reinforce our dedication to ethical business transparency, practices, and accountability, thereby ensuring trust and confidence stakeholders. among our our relentless Additionally, pursuit of excellence has been recognized through more than 170 prestigious awards since our inception, underscoring our industry leadership and unwavering focus on delivering value.

I invite you to explore this report and gain insight into our sustainability initiatives, spanning environmental stewardship, social impact, diversity inclusion, and corporate governance, and ethical business conduct. We recognize that this is an ongoing journey, and we remain committed to continuous improvement, innovation, and adaptability in response to an ever-evolving world, with transparent and measurable actions.

Thank you.

## MESSAGES FROM THE KEY PEOPLE



Karan Bhagat Founder, MD and CEO 360 ONE WAM LIMITED

Dear Valued Stakeholders,

I am delighted to connect with you and share our continued journey towards sustainability, responsible business practices and long-term value creation. At 360 ONE WAM LIMITED, we recognize the importance of environmental, social, and governance (ESG) principles and I would like to highlight some of our key achievements and our vision for the future.

We have taken a holistic approach to integrating sustainability across our business, governance, and 2023operations. In FY 24, more than 80% of our electricity consumption was from green power, which significantly reduced our carbon emissions. Since FY 2021-22, our CSR initiatives have positively impacted over 140,000 lives, with 29,492 individuals benefitting in FY 2023-24 alone through innovative blended finance CSR programs. As of March 31, 2024, our gender diversity stood at 32%. Additionally, we maintained zero cases of environmental noncompliance as a testament to our commitment to responsible operations. In FY 2023-24, we made significant strides in digital transformation, with 98% of our wealth clients onboarded digitally.

Over the years, we have transformed into India's premier wealth and asset management firm, driven by unwavering commitment an to excellence and a clientcentric approach. Our team of over 1,000 experienced professionals diligently wealth manages the and assets of more than 7,200 of India's high net-worth families, including industrialists, technology pioneers, CEOs, sportspersons, artists, and professionals. 360 ONE stands as a leader in the financial sector, managing client assets

worth approximately INR 4,67,000 Crores as on March 31, 2024.

In an increasingly dynamic environment, we continue to embrace technological advancements and evolving client expectations. Virtual and engagement digital resilience are at the heart of our IT strategy, enabling us to deliver innovative solutions that enhance client experiences. As cybersecurity remains a critical priority, we continue to strengthen our capabilities to safeguard our clients' assets, ensuring trust and security in all interactions. Additionally, our commitment to human capital development fosters a culture of continuous learning, equal opportunity and diversity fostering an ecosystem where talent and innovation thrive.

As we move forward, I extend my heartfelt gratitude to all stakeholders, clients, our employees, investors, and partners for their unwavering trust and support. Together, we will continue to build a future that is both financially prosperous and socially responsible.

Thank you.

## ABOUT THE REPORT

360 ONE WAM LIMITED ("Company"), is one of the largest wealth and alternatesfocused asset management firms in India. It has built a comprehensive wealth and asset platform over the years. The Company recognises the importance of creating value for all of its key stakeholders (including customers, investors, employees, service providers / value chain partners, media, regulators and communities & NGOs). As a responsible wealth and asset management firm, the Company endeavours to integrate Environmental, Social and Governance ("ESG") considerations into its operations and investment decision-making process to generate sustainable returns for its clients, while creating a positive impact on society and the environment. Its ESG efforts are aimed at delivering sustainability goals and making а meaningful contribution towards a better future for itself and its stakeholders.

Since FY 2021-2022, the Organization has integrated ESG related disclosures into its Annual Report as part of the Business Responsibility and Sustainability Report ("BRSR") and it published its 3rd BRSR as part of the Annual Report for FY 2023-24. Further, the Company published its maiden Sustainability Report for FΥ 2022-23, which aimed at communicating its sustainability efforts and to demonstrate its commitment to responsible business practices.

With this 2nd sustainability report, the Company aims to share its continued efforts and initiatives taken to further integrate ESG into its business operations and sustained value creation for its stakeholders and society.

#### **Reporting Guidelines**

This Report has been prepared with reference to the Global Reporting Initiative (GRI) Standards.

#### **Reporting Boundary**

This report details the sustainability performance of the Company and its

subsidiaries (collectively referred to as **"360 ONE"** or **"Organisation")** for the financial year 2023-24. The data in this report pertains to 360 ONE's domestic operations.

#### Statement of Use

360 ONE is committed to being transparent to all its stakeholders about the integration of ESG practices in its operations.

This report is made with the vision to disclose the 360 ONE's ESG initiatives and create a benchmark for upcoming developments.

#### Feedback

360 ONE would appreciate feedback and insights on the contents of this report, as it would help in improving its's efforts, performance and policies. For feedback and queries please write to us at sustainability@360.one.

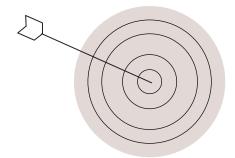
## ABOUT 360 ONE

360 ONE WAM LIMITED, is one of the largest wealth and alternates-focused asset management firms in India, with around Rs. 4,67,000 Crores in overall assets under management as on March 31, 2024. As our name suggests, we take a holistic view of the ONE person whose interests always come first – our client. We offer a range of solutions including wealth and asset management, lending solutions and estate planning services. We deliver long-term performance and bespoke solutions for our clients.



## **ESG** Vision

360 ONE's vision is to be a leading Wealth and Asset Management company and integrate ESG in its operations, governance and business practices with a 360-degree approach for providing best in class, bespoke services to its esteemed clients, for creating long term value for all stakeholders, with care for environment, wellbeing of employees and meaningful contributions to society.



#### **Purpose**

At 360 ONE, we understand that our clients seek long-term performance that withstands the test of time, including economic fluctuations and unforeseen events. Additionally, our commitment to our clients is beyond mere numbers. It is a personalised experience tailored to each client's unique needs. We take immense pride in the deep relationships we cultivate, as our clients have played a pivotal role in establishing us as market leaders. We dedicate ourselves to understanding our clients' goals on a profound level, crafting investment strategies that align with their individual aspirations. With our expertise, unwavering dedication, and unyielding energy, we transform what may seem impossible into tangible opportunities. Our 'client-first' approach permeates every aspect of our operations, ensuring that we are always on, proactive and transparent.

# Values



CLIENT-CENTRIC Our single-minded focus is on our clients, always. We care, we listen, we learn, and we execute to deliver beyond client expectations.



#### **ENTREPRENEURIAL** We have extreme ownership

from ideation to execution. We are innovative, agile and outcome-oriented.



#### RIGHT IN SPIRIT AND LETTER

We do what is right over what is easy, for our clients, fellow employees, and stakeholders. We are transparent, honest, and courageous.



#### PEOPLE-ORIENTED

We are inspired, collaborative and inclusive. Above all, we respect each other as individuals, colleagues and stakeholders working towards the same goal.



#### CHANGE CHAMPIONS

We embrace and accept change. We are driven by passion and a positive attitude. We seek opportunities to continuously learn and grow.

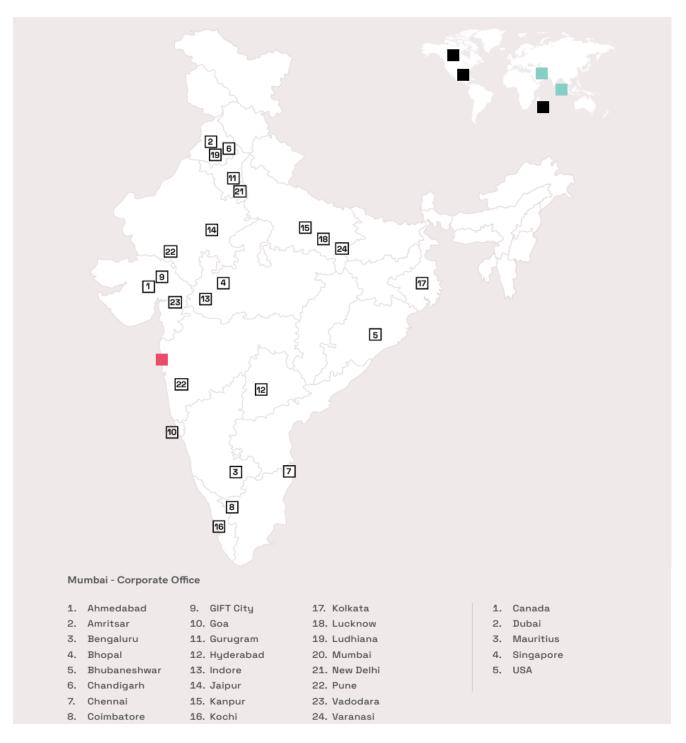


#### RIGOROUS AND RISK-CONSCIOUS

We are thorough and analytical in our decisionmaking for clients and our own business. Our enhanced risk awareness and robust governance mechanism helps navigate through all scenarios.

### Market Served

360 ONE has a thriving network of physical and digital customer touchpoints across the country. This helps 360 ONE stay closer to its customers. The branches and touchpoints span 26 locations across India and 5 international offices, enabling 360 ONE to foster close relationships with its customers and ensure utmost customer satisfaction. 360 ONE also continues to invest in expanding its digital capabilities to complement the physical reach, as well as further enhance its efficiency and customer experience.



## 360 ONE Businesses

360 ONE offers a comprehensive range of services, including wealth and asset management, lending solutions and estate planning. It is focused on creating long-term relationships with sustainable business practices that ensure lasting benefits for their clients, investors and the team.

#### WEALTH MANAGEMENT

360 ONE Wealth has an open architecture which means we recommend the best products in India that meet our client's needs. This is consistently achieved through relationships built on trust generated through sound advice from experts. The holistic advice emerges from deep research and having the best talent in the industry. We offer innovative and comprehensive investment solutions that are tailored to client needs. With this unique proposition, we are truly able to align with our client's interests and be on the same side of the table. Our client segment includes professionals, industrialists, corporate treasuries, senior executives, large traders, funds, endowments, family offices and entrepreneurs. For more details on our wealth management business, please refer the Annual Report for FY 2023-24.



### ASSET MANAGEMENT

With deep domain knowledge, a demonstrated ability to operate effectively throughout varying market cycles and a highly experienced investment team, we are focused on creating the right riskadjusted alpha for investors. Our differentiated product suite includes Alternative Investment Funds (AIFs), Portfolio Management Services (PMS) and Mutual Funds (MFs), spanning asset classes of public and private equity, private credit and real assets. With our diversified range of strategies, our prominent position and well developed platform within this domain, we are best placed to address significant growth opportunities. For more details on our asset management business, please refer the Annual Report for FY 2023-24.



## LENDING SOLUTIONS

We extend strategic lending solutions to enable our clients to meet short-term capital requirements.

We have flexible lending models that work to their advantage.



### ESTATE PLANNING

We offer advisory services to families to address their succession needs for Indian assets. The primary goal of estate planning is to ensure that the estate of the wealth earner/owner is seamlessly transitioned to beneficiaries, maximising efficiency while continuing to be utilised for the benefit of the family. We specialise in succession planning across diverse asset classes, including business holdings, financial assets, immovable properties, jewellery, art, and artefacts. Furthermore, our Trust Administration Services offer a sophisticated solution for Trusteeship and Trust maintenance, allowing families to retain primary control while ensuring the trust is professionally managed.



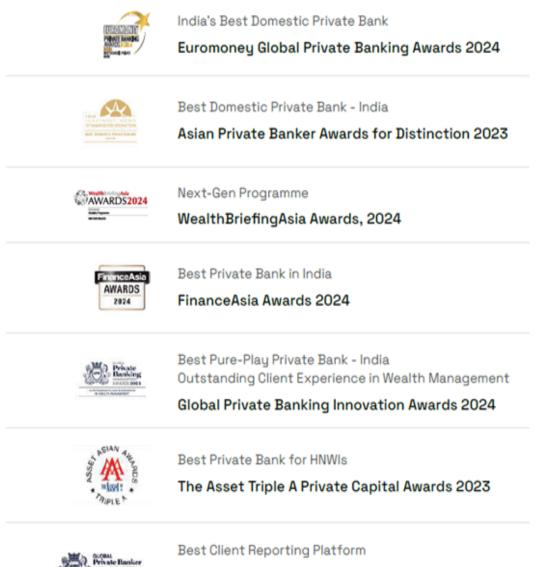
## **Recognition and Accolades**

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With more than 30 awards and accolades won in FY 2023-24, we have been recognised by leading global institutions and peers for our unwavering commitment to excellence and client success, thus setting new benchmarks in private banking innovation. We have been honoured with over 170+ awards in last 16 years, and we thank all our clients, shareholders, investors and employees for believing in us.

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## Top Awards Won in FY 2023-24



Global Private Banker WealthTech Awards 2024

## **Corporate Holding Structure**

(as on March 31, 2024)

#### **360 ONE WAM LIMITED**

<b>DOMESTIC SUBSIDIARIES</b> Wholly- Owned Subsidiaries	INTERNATIONAL SUBSIDIARIES Wholly- Owned Subsidiaries
<b>Distribution</b> 360 ONE Distribution Services LIMITED (Former- ly known as IIFL Wealth Distribution Services Ltd.)	<b>Singapore</b> 360 ONE Capital Pte. Ltd. (Formerly known as IIFL Capital Pte. Ltd.)
<b>Advisory and PMS</b> 360 ONE Portfolio Managers LIMITED (Formerly known as IIFL Wealth Portfolio Managers Ltd.)	<b>Dubai</b> 360 ONE Private Wealth (Dubai) LIMITED. (Formerly known as IIFL Private Wealth Management (Dubai) Ltd.)
NBFC 360 ONE Prime LIMITED (Formerly known as IIFL Wealth Prime LIMITED)	<b>Canada</b> 360 ONE Capital (Canada) LIMITED. (Formerly
Family Trustee 360 ONE Investment Adviser and Trustee Ser- vices LIMITED (Formerly known as IIFL Invest- ment Adviser and Trustee Services Ltd.)	known as IIFL Capital (Canada) Ltd.) <b>USA</b> 360 ONE Inc. (Formerly known as IIFL Inc.)
<b>Asset Management</b> 360 ONE Asset Management LIMITED (Formerly known as IIFL Asset Management Ltd.)	<b>Mauritius</b> 360 ONE Asset Management (Mauritius) LIMITED (Formerly known as IIFL Asset Management (Mauritius) Ltd.)
<b>Alternates Asset Management</b> 360 ONE Alternates Asset Management LIMITED	
<b>Investment Platform for early stage ventures</b> MAVM Angels Network Pvt. Ltd.	
<b>Gift City</b> 360 ONE IFSC LIMITED (Formerly known as IIFL Wealth Securities IFSC Ltd.)	
<b>AMC Trustee</b> 360 ONE Asset Trustee LIMITED (Formerly known as IIFL Trustee Ltd.)	
<b>CSR</b> 360 ONE Foundation (Formerly known as IIFLW CSR Foundation)	

#### Economic Value Generated and Distributed



Economic Value Generated





Economic Value Retained

320.58 Crores Economic Value Retained (INR)



Economic Value Distributed

686.69 Crores Employee benefit and wages (INR)

**514.51** Crores Operating Costs (INR)

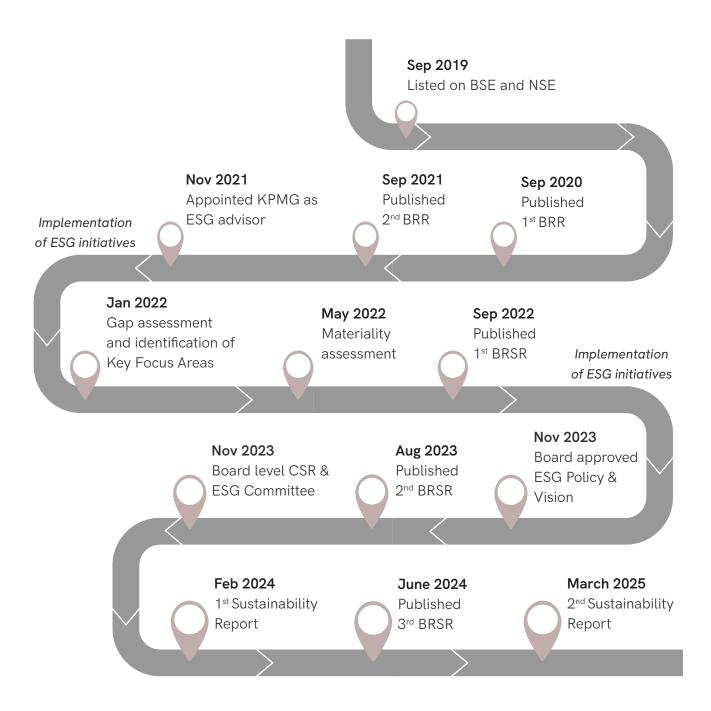
**1233.53** Crores Payment to providers of capital (INR) **11.48** Crores Community Investment (INR)

**157.92** Crores Payment to Governments (INR)

**2604.15** Crores

## ESG @ 360 ONE

## 360 ONE's ESG Journey



## ESG HIGHLIGHTS



#### Enviornment

- Procurement of green energy for Mumbai Corporate Office to minimize Scope 2 emissions since FY 21-22
- 80% of total electricity consumed during FY 2023-24 is green power
- 360 ONE's Bengaluru office at One Trade Tower received LEED certification (Zero Carbon) in FY 23-24
- 30.14% AUM under Private Credit asset class focused towards ESG positive sectors as on Mar 24 (from 31 in Mar 23)
- Around 98% of wealth clients in FY 24 (up from 21% in FY 23) on-boarded digitally - saved paper and trees

#### Social

- Gender diversity as on Mar 24 at 32% (up from 31.75 in Mar 23)
- Average no. of training hours per employee at
   15.88 hours during FY 24 (up from 11.6 in FY 23)
- Positively impacted

   1,40,000 + beneficiaries
   through CSR programs
   since FY22 and 6.13X
   impact of blended finance
   projects for every rupee
   of grant, delta change in
   beneficiary income/assets/
   social security entitlements
- 170+ Awards received since inception

#### Governance

- Board adopted ESG policy
- Board constituted CSR and ESG Committee to monitor ESG initiatives
- ESG risk included in the Risk Management Policy
- Zero cases of environmental noncompliance, corruption, bribery, conflict of interest and data privacy breaches
- Voluntary annual reminders for unclaimed dividends
- Received Corporate
   Governance score of 63
   from IiAS and
- Received combined ESG score of 78 (up from 77.6 in FY 23) from SES and 65 (up from 62 in FY 23) from CRISIL.

## STAKEHOLDER ENGAGEMENT AND MATERIALITY

As per GRI, stakeholders are entities or individual that can reasonably be expected to be significantly affected by the reporting Organization's activities, products and services, or whose actions can reasonably be expected to affect the ability of the Organization to successfully implement its strategies and achieve its objectives.

360 ONE is aware that its activities are directly or indirectly influenced by a number of stakeholders such as customers, employees, investors, regulators, peers etc. Therefore, it prioritises understanding and addressing the needs and concerns of its stakeholders in a transparent and ethical manner in order to build long-term relationships. By prioritizing stakeholder engagement, the Organisation ensures that it is aligned with the expectations of its stakeholders, which can help to mitigate risks and enhance its reputation in the marketplace.

List of stakeholder groups identified as key for 360 ONE and the frequency of engagement with each stakeholder group:

S.N.	Stakeholder Group	Whether identified as Vulnerable and Marginalized Group	Channels of communication	Frequency of engagement	Purpose and Scope of engagement including key topics and concerns raised during such engagement
1.	Customers	No	<ul> <li>Regular business interactions through sale and service teams</li> <li>Customer feedback surveys</li> <li>Customer grievance channels</li> <li>Periodic press releases and media interactions programmes</li> <li>Social media</li> </ul>	<ul><li>Regularly</li><li>Need basis</li></ul>	<ul> <li>Customer service and feedback</li> <li>Redressing customer grievances</li> <li>Providing information regarding products and services</li> </ul>

S.N.	Stakeholder Group	Whether identified as Vulnerable and Marginalized Group	Channels of communication	Frequency of engagement	Purpose and Scope of engagement including key topics and concerns raised during such engagement
2.	Shareholders and Investors	No	<ul> <li>Stock Exchange intimations</li> <li>Investor Presentations</li> <li>Organisation Website</li> <li>General meetings / postal ballots</li> <li>Annual Report / Sustainability Report</li> <li>Investor/Analyst meets/ calls</li> <li>Media releases</li> </ul>	<ul> <li>Need basis</li> <li>Quarterly / Half Yearly /Annually</li> </ul>	<ul> <li>Financial performance</li> <li>Business Updates</li> </ul>
3.	Employees AAA AAA	No	<ul> <li>Leadership and HR outreach</li> <li>Performance reviews</li> <li>Feedback Surveys</li> <li>Intranet portal</li> <li>Town Halls</li> <li>Learning and Development programmes</li> <li>Whistle-blower mechanism</li> <li>POSH mechanism</li> </ul>	<ul> <li>Need based</li> <li>Annual</li> </ul>	<ul> <li>Employee Productivity</li> <li>Talent management</li> <li>Learning and development</li> <li>Annual performance management</li> <li>Yearly reward and recognition programme</li> <li>Employee wellbeing</li> <li>Sense of Ownership and alignment to the Organisational vision &amp; mission</li> </ul>
4.	Service Providers/ Value Chain Partners	No	<ul> <li>Meetings</li> <li>Phone/email</li> </ul>	• Need based	<ul> <li>Periodic assessments</li> <li>Service issues and discussions</li> </ul>

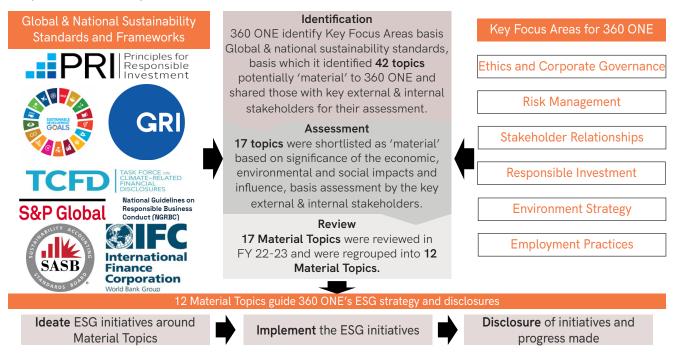
S.N.	Stakeholder Group	Whether identified as Vulnerable and Marginalized Group	Channels of communication	Frequency of engagement	Purpose and Scope of engagement including key topics and concerns raised during such engagement
5	Media	No	<ul> <li>Written Communications</li> <li>Interviews and Forums</li> <li>Press release</li> <li>Publications and Announcements</li> </ul>	• Need based	• Staying updated about the latest developments of the Organisation
6	Regulators	No	<ul> <li>Meetings</li> <li>Statutory filings</li> <li>Written communication</li> </ul>	<ul> <li>Quarterly/ Half- yearly/ Annually</li> <li>Need based</li> </ul>	<ul> <li>Regulatory compliance</li> <li>Corporate governance</li> <li>Financial performance</li> </ul>
7	Communities and NGO	Yes*	<ul> <li>Meetings</li> <li>Conferences</li> <li>Workshops</li> <li>Phone/Email</li> <li>CSR Partnerships</li> </ul>	• Need basis	<ul> <li>Baseline and need assessment surveys</li> <li>Community engagement programmes</li> <li>Monitoring and Evaluation</li> </ul>

\*Our CSR programmes are designed to benefit beneficiaries from marginalised and vulnerable backgrounds.

## Materiality Assessment

360 ONE embarked on its ESG journey by leveraging stakeholder engagements and materiality assessment to determine key material topics. 360 ONE conducted its first materiality assessment with internal and external stakeholders in FY 2021-22. In FY 2023-24, senior management carried out an internal review to further refine the material topics to ensure continued strategic alignment.

#### Steps of Materiality Assessment



#### UN SDG Alignment with Material Topics





Customer relationship management 360 ONE prioritizes client's risks, interests and upholds ethical practices in investment advisory, transactions, monitoring and reporting.



Talent management, employee engagement, work culture Creating a positive work environment, ensuring employee satisfaction and encouraging active engagement are essential for building a strong team and a supportive work culture.





Human rights, diversity & inclusion and equal opportunity The Organisation is committed to strengthen its approach towards human rights and has established various policies to address the same.





**Community development** Through targeted initiatives, 360 ONE contributes to CSR activities focusing on critical and relevant thematic areas such as livelihood, financial inclusion and education.





Brand reputation, ethics, transparency and trust 360 ONE values ethical conduct to establish trust with clients, regulators and the community and emphasizes on transparency, fairness, integrity and accountability and adheres to its values.

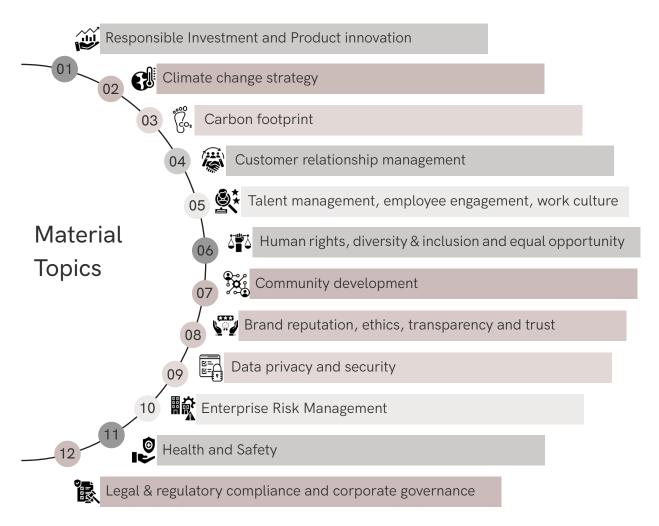


Data privacy and security 360 ONE is Implementing measures to stay ahead of evolving threats and to ensure a safeguarded environment.





#### Material Topics



## HUMAN CAPITAL

## **Empowering Talent**

1226 (Male: 834) (Female: 392)

Total Employees

(include employees of all the subsidiaries of 360 ONE WAM LIMITED i.e. domestic and international)

**15.9** Average Employee training hours (Per person) **32%** Gender Diversity

### Human Capital

360 ONE firmly believes that employees are the driving force behind success of any Organisation. They are its most valuable assets. We are committed to creating a safe and equitable environment for them. We are dedicated towards building a diverse and inclusive workplace that empowers its employees and aligns their success with the Organisation's performance.

We have administered various approaches to increase employee productivity, satisfaction and engagement. We believe that diversity, inclusion and equality are integral to the business and thus we offer all the employees equal opportunities irrespective of gender, cultural diversity, age, or disability. 360 ONE also places utmost importance on the safety and well-being of its employees.

The diversity ratio at 360 ONE for the financial year 2023-24 32%, stood at demonstrating the commitment to fostering a balanced and inclusive workforce. The aim is to continue nurturing an environment where every individual feels valued, respected and empowered to reach full potential.

## Guided by the Policies

360 ONE has adopted various employee-oriented policies covering areas such as:

- Employee wellbeing and benefits, Employee Health and Safety and Code of Conduct for all employees as part of the 'Workplace Guide' (available on intranet with access to all employees of 360 ONE),
- Prevention of Sexual Harassment and Compliant Procedure Policy available at (<u>Website</u>)
- Policy on Vigil Mechanism and Whistle Blower Mechanism available at (Website)
- Equal Opportunity and Commitment to Diversity (Website)

360 ONE has put in place policies for employees (as part of 'Workplace Guide' available on the intranet) which lays down all policies and frameworks of employment that employees need to abide by. These policies inter alia focus on best employment practices and respecting the human rights of the employees, endeavour to avoid causing or contributing to adverse human rights impact and addressing any impact as and when it occurs. These policies are in

adherence to the regulatory and business requirements. 360 ONE has neither received nor provided any monetary or in-kind political contributions or government assistance for the benefit of the organization.

## Harassment Free Workplace

360 ONE understands the importance of protecting human rights and ensuring the well-being of employees and has implemented a range of internal policies. It is committed towards providing a safe and secure workplace that is free from violence and harassment. By upholding human rights and fostering supportive work environment, 360 ONE aims to create culture where every employee feels valued, respected and empowered. It strongly believes that a positive work environment is not only essential for the personal wellbeing of the employees but it also plays a pivotal role in promoting their professional growth and overall job satisfaction.

In FY 2023-24, there was one complaint received regarding sexual harassment, and no complaints received regarding working conditions, health and safety, discrimination at the workplace, human rights violations, child labour, forced/ involuntary labour, wages and employee safety issues.

360 ONE has a grievance redressal mechanism for sexual harassment-related issues. The Organisation is an equal opportunity employer and the goal is to foster an atmosphere that is friendly, just and peaceful. Employees are guaranteed the "right to work" and are focused on creating an atmosphere that is free from sexual harassment, coercion and disruptive behaviour. To enable easy access for employees to complain, a dedicated email ID - posh@360.one has been provided to tackle complaints under this policy. Employee also raise concerns can through the Helpdesk that is in place on the Organisation's HR Portal, where such grievances can be reported. An Internal Complaints Committee (ICC) has been constituted in line with the POSH Act to address such concerns. The said policy is available on (Website).

For all other types of complaints of discrimination or harassment, a separate provision has been made on the internal HR Portal, where such concerns can be reported and get directed to the concerned set of individuals the Human Resources in Team. Complete protection is given to the complainant / whistle blower against any unfair practice like retaliation, threat, or intimidation of termination / suspension of service, disciplinary action, transfer, demotion, refusal of promotion, discrimination, any type of harassment, biased behaviour including any direct or indirect use of authority to obstruct the complainant's right to continue to perform his / her duties / functions.

## Employee Grievance Redressal

360 ONE is also committed to creating an environment where all its stakeholders, including contractors, suppliers, service providers, contract personnel and directors, feel secure raising concerns about any unethical or improper behaviour. To ensure this, 360 ONE has a Policy on Vigil Mechanism and Whistle Blower Mechanism which enables stakeholders to report any incident that indicates malpractice, major irregularities, fraud, unethical business conduct, abuse or wrongdoing, or a breach of any Indian legislation. When an employee or a director report in good faith, the existence of any of the aforementioned activities, they are protected under the Policy from being fired, subjected to retribution, or discrimination. 360 ONE

has а third-party ethics helpline which creates an open atmosphere that encourages employees to red flag internal ethics and compliance issues without any fear of retaliation. With these timely alerts, raised internally, the senior management can deal with incidents internally and protect employees, business interests and reputation. The Organisation also has an employee grievance portal which is available on the intranet and is accessible to all employees to voice their day-to-day concerns and get them addressed in a timely manner. The Organisation also offers an external independent multi-channel interface to its employees, for reporting any unethical conduct / malpractice they may see around them. Employees have access to toll free number, access to online reporting and mailing options. The Audit Committee and Vigilance Committee conduct a detailed investigation on any concerns reported. The said policy is available on (Website).

### Employee Feedback

360 ONE is in continuous engagement with the team to ensure that they are confident with their work, strive for improvement and display a positive attitude towards work. By actively seeking and listening to employee feedback, it gains valuable insights into its strengths and areas that need attention. 360 ONE uses the following systems to gather employee feedback.

- Employee Volunteering Survey
- Inductions and Training Programs
- Annual Offsite
- MoodXpress on the HR Portal

## People and HR Practices

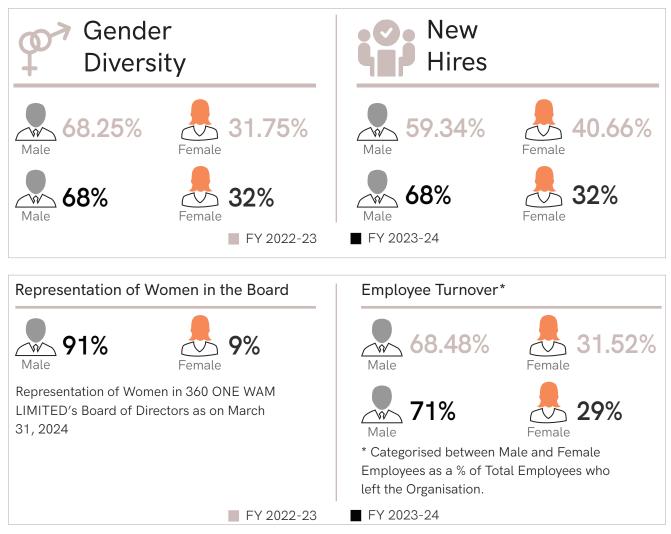
The HR practices at the Organisation strive to create a positive and supportive work environment aimed to attract, retain and nurture top talent. The Organisation continuously make investments for comprehensive learning and development programs which foster a culture of continuous feedback and recognition and work-life promote balance through flexible arrangements and wellness initiatives.

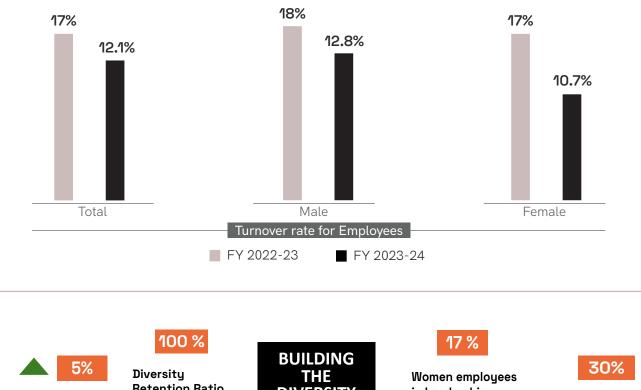
Guided by the Organisation's core value and ethics, 360 ONE is dedicated to the success, satisfaction and wellbeing of its people. Said core value and ethics aim to build a stronger and more engaged workforce, driving long-term Organisational success. 360 ONE endeavours to incorporate human rights requirements emanating from statutory requirements in its agreements with value chain partners. 100% of its offices were also assessed for Child labour, Forced labour and discrimination at workplace.

## Diversity, Equity & Inclusion

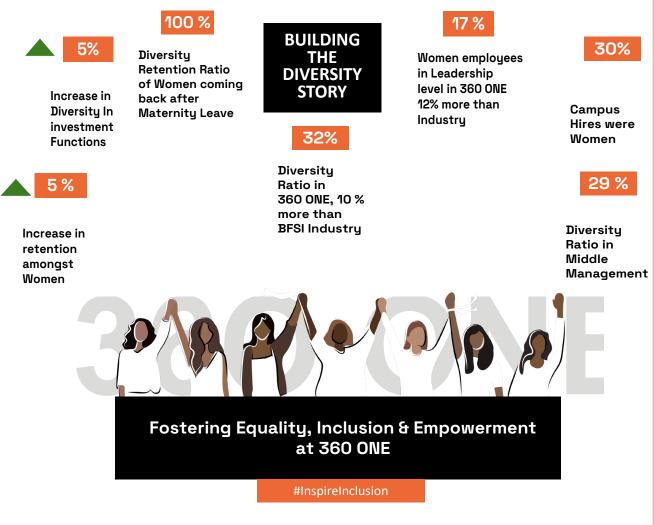
360 ONE has a policy for Equal Opportunity and Commitment to Diversity in place. It is committed to create and maintain a workplace in which all employees have an opportunity to participate and contribute to the success of the business and are valued for their skills, experience and unique perspectives. The policy also ensures equal opportunity to all its employees irrespective of race, colour, ancestry, national origin, gender identity, sexual orientation, marital status, religion, age, disability. The policy expressly prohibits any form of unlawful employee harassment or discrimination at the workplace. The gender diversity in the Organisation as on March 31, 2024, stood at 32% and 360 ONE constantly endeavours to improve the same.

Various initiatives have been implemented in the workplace for easy access for differently-abled individuals. The office areas have been well facilitated with easy access to lifts and ramps for easy movement across the floors of the corporate office, with availability of wheelchair.





## Turnover rate for Employees



## Fair Remuneration

360 ONE recognizes the importance of fair and competitive remuneration for all their employees. It believes in offering a comprehensive compensation package that aligns with industry standards and reflects the skills, experience and contributions of its workforce. The remuneration framework takes into account factors such as job responsibilities, performance and market trends to ensure that the employees are fairly rewarded for their efforts and are motivated from incentives perspectives.

The remuneration to the key managerial personnel and senior management personnel is decided based on following guidelines:

- 1. Maintaining a balance between fixed and incentive pay reflecting short and long-term performance objectives appropriate to the working of the Organisation;
- 2. Remuneration should be reasonable and sufficient to attract, retain and motivate key managerial personnel and senior management;
- 3. Remuneration payable should comprise of a fixed component and a performance linked variable based on the extent of achievement of individual performance vis-a-vis overall performance of the Organisation;
- 4. Remuneration shall also be considered in form of long-term incentive plans for key employees, based on their contribution, position and length of service, in the nature of ESOP / ESPS etc.

The remuneration for other employees is as per compensation structures and policies as may be determined and reviewed from time to time, with an objective of attracting, retaining and motivating them with appropriate balance of fixed and performance linked pay.

## Awards and Accolades



Spark Inclusive Leadership Summit 2023 Excellence in Developing Women Leaders, India



India HR Summit 2023 Best HR Tech Company of the Year 2023



ET progressive Places to Work 2023 Progressive Place to Work, India

## Learning and Development

#### Highlights

## 15.9 Hours 100

Average training hours per person

#### of the employees are provided trainings on POSH, Vigil and Whistle blower mechanism

Trainings for Employee Development

922 (81%) Unique employees covered

## Details of trainings given

360 ONE provides training to its employees on various aspects such as personality development, computer skills, interpersonal skills and other domain specific trainings. Trainings conducted during the year include:

Training Name	Description
Induction	It is an orientation program designed for new joiners to understand the Organization's history, culture, products, processes and people.
Service & Operations Excellence Journey	An excellence journey designed around the identified 5 broad pillars. Training sessions are organized basis the broad pillars followed by teach-back sessions by Team Leaders to the larger audience. A dashboard is maintained monthly for tracking performance of individuals on the 5 pillars and basis a cutoff, employees leading the dashboard are rewarded.
Relationship Manager <b>("RM")</b> Bootcamps	A program to unlearn / learn / ideate about the various product and platform proposition we have. Participants are trained by MD & CEO, Co-Founders and heads of the respective business / products.
The Exceptional Presenter	The workshop lays out techniques in a format perfectly suited to today's busy world. Leaders will learn how to infuse any type of presentation or crack client meetings with energy, confidence and verve.
RM Workshop / Wealth Workshop	A two-day intensive workshop for RMs to learn about various product and offerings to make them job ready.
Turnaround Time <b>("TAT")</b>	Understand the criticality of TAT around being responsive to client, maintain adherence to processes and at the same time respond quickly. Learn to plan and define the approach to be more efficient and the need to adhere them.
TAT Teachback	Team leaders cascade the learnings from TAT session further to the team.
Excel workshop	Focuses on usage of functions, formula, pivots, conditional formatting and macros.
Effective Time Management	Workshop to focus on importance of time management, prioritization tools and techniques and ways to overcome obstacles with managing time.
Impactful communication	Workshop to focus on the fundamentals of communication, components and awareness of written & verbal communication.
Influencing People	To empower participants with the knowledge and skills needed to navigate professional relationships, collaborate effectively and achieve positive outcomes through the art of influencing.
Managerial Excellence	Harness the Team Leaders to internalize, empathize and improve relationships by building trust.
Managing People	Enable people managers to effectively manage self and build relationship with the team by resolving conflicts and problem solving.

Apart from the above-mentioned trainings, the Organisation has also subscribed to LinkedIn Learning and makes relevant trainings accessible to all employees. LinkedIn Learning has been used by many employees to upskill themselves and gain knowledge on recent technologies and practices.

## Employee Benefits

All of 360 ONE's India employees are covered under the Organisation's Group Term Life Insurance policy. This policy provides financial protection and security to the employee's family, in case of an unfortunate death of an employee. As part of an employee welfare initiative, the insurance premium for this policy is borne by 360 ONE on behalf of the employees. This policy acts as an 'emergency kit′ by providing financial protection and security to the employee's family, after unfortunate death. his/her The sum insured is based on Organisational hierarchy.

360 ONE also has in place a group level Mediclaim policy to address the medical and healthcare needs of its employees. The employees are educated about these policies during the induction and they are made available on the internal portals.

## Retirement benefits

360 ONE provides transition assistance programme to facilitate continued employability and the management of career endings. Post retirement, employees are evaluated and an option to work as full-time or part-time consultants, may be provided case-to-case on а basis. Retirement bonus is made available to the employees that is one month's gross salary for every completed year of service to the employees that have been with the Organisation for a minimum of 5 years. The Organisation also contributes to the Employees Provident Fund and further provides a platform for employees to create their own corpus by investing in the National Pension Scheme via the Organisation.

## Parental leave

360 ONE recognizes and prioritises the significance of parental leave in promoting the well-being of the employees and their families. The Organisation has implemented a parental leave policy that facilitates a smooth transition parenthood for the into employees. This policy allows the employees to adjust to their new responsibilities.

## Employee Health and Safety

The Organisation understands the importance of inculcating healthy and safe behaviour among its employees. To encourage both physical and mental wellness initiatives such as providing access to physical fitness sessions, emotional and mental health training, nutrition awareness etc. Yoga and meditation training are conducted on а periodic basis. Along with the above, regular safety training and drills are also conducted. The Organisation also conducts the safety management actions for physical security including training on basic and advanced fire safety hazards, including evacuation drills and handling of fire-safety equipment with the help of third-party vendors. Among the other programmes that are carried out by the Organisation, some of the key programmes are as follows:

- Physical Fitness sessions: These sessions include workouts around core strengthening, body stretching exercise specifically back, neck shoulders, pelvic and tilts, dance fitness and no equipment workout sessions.
- Yoga and Guided Meditation: It is aimed at overall wellness of the employees including physical exercise and meditation sessions. These sessions focus on the awareness of strengthening core immunity boosting yoga,

pranayama, various flexibility asanas and calm yourself with yoga.

- Emotional and Mental Health: Apart from the physical wellbeing programmes, 360 ONE also addresses the growing need of mental and emotional health. In the previous year various sessions have been conducted on topics related to encouraging openness about mental illness at the workplace, work life balance, battling burnout, digital detox and lifestyle management etc.
- Nutrition: In busy lives ► of employees, nutrition requirements of the body are often ignored and that is where 360 ONE has tried to bridge the gap with such awareness and value addition sessions. These sessions cover topics such as health and sustainable eating, food for a healthy heart, emotional eating, fighting obesity, diet for good gut, hair and skin and boosting the natural immunity.
- Ergonomics: Being a service sector
   Organisation, there are no manufacturing/product
   risks at the workplace,
   however, there are risks
   related to ergonomics
   in the workplace as well

as those associated with the operation of utilities and employee commute. These are addressed by the relevant personnel at each office location and by facilitating ergonomic workplace chairs, gymnasium and gaming area etc.

 Additionally, 360
 ONE encourages open communication and feedback from employees to continuously improve its health and safety practices.

The Organisation has а robust system of policies and processes to always ensure the wellbeing of its employees. It ensures that there are first-aid kits that are placed on each floor and are replenished on a regular basis. 360 ONE has tieups with clinics in the vicinity of its corporate office, to ensure there is a doctor on call and immediate medical assistance as required. Within the premise there is availability of hospital beds, stretcher, wheelchairs and also a hospital setup for any medical emergency support.

In FY 2023-24, there were zero cases of work related injuries or ill Health.

## Performance Appraisal

360 ONE follows a meritocratic

performance appraisal process. Year on year, through its structured performance management system, high performers are identified and incentivized through career progression.

The performance appraisal process starts with a goalsetting exercise wherein emplovees collaborate with their immediate reporting authoritytoaligntheirobjectives with the Organisation's vision and objectives. Employees fill an online appraisal form which describes their achievements across the various key result areas and also rate themselves against each such key result area. This exercise ensures claritv and alignment in performance expectations.

information This is then forwarded to their immediate authoritv reporting and department heads for giving their feedback on the employee's performance and an overall rating is arrived at which is used as a basis for deciding the compensation pay-outs.

100% of the eligible employess underwent performance and career development reviews during the FY 2023-24.

## ENVIRONMENTAL STEWARDSHIP

360 ONE is adopting sustainable business practices. We understand that reducing environmental footprint and mitigating climate risks are responsible ways to manage business operations. Environmental considerations are important for any Organization in promoting environmental sustainability and safeguarding the planet for future generations.

In today's global landscape, businesses are confronted with a range of climaterelated risks, including extreme weather events, social disruptions, persistent heat waves and biodiversity loss to name a few. It is imperative for the business leaders to navigate their Organisations in the right direction and cultivate operational resilience. 360 ONE, acknowledges the importance of transitioning to a low-carbon economy and endeavours to embrace sustainable practices.



360 ONE is engaged in providing financial services and as such its operations do not account for substantial energy consumption. However, 360 ONE has adopted various initiatives to reduce its carbon The Organisation footprint. educates employees to reduce the overall paper consumption and print when necessary and required. Furthermore, various employee education programs have been conducted to raise awareness about the importance of reducing unnecessary printing, limiting access at the central hubs and minimising air conditioning usage.

The workspace has been revamped to reduce the consumption total energy by using technology such as radiant cooling, replacing the (Compact Fluorescent CFL Lamp) with LEDs (Light-Emitting Diode) and adopting VRV (Variable Refrigerant Volume). Additionally, we have implemented automatic

shutdown mechanisms for idle monitors, air conditioners and lights, effectively reducing energy consumption.

In order to reduce scope 2 emissions, during the year under review, the Organisation procured ~83% of its electricity from renewable sources. Furthermore, the Organisation encourages digital meetings and conferences to reduce its air travels to reduce the GHG emissions.



8385.83 GJ Total Energy consumption

**1449.57** GJ

Total Electricity consumption by Grid

3.34

Energy Intensity per rupee turnover (Total Energy Consumption / Turnover in Rupeee Crores)

### **13.42** GJ Total Fuel consumption

**6922.84** gj

Total Energy consumption by Renewable sources

6.84

Energy intensity per employee (Total Energy Consumption / Total Employees)

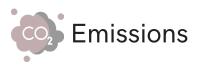
Bifurcation of Renewable and Non- Renewable energy Consumption for FY 2023-24.





Non Renewable Energy

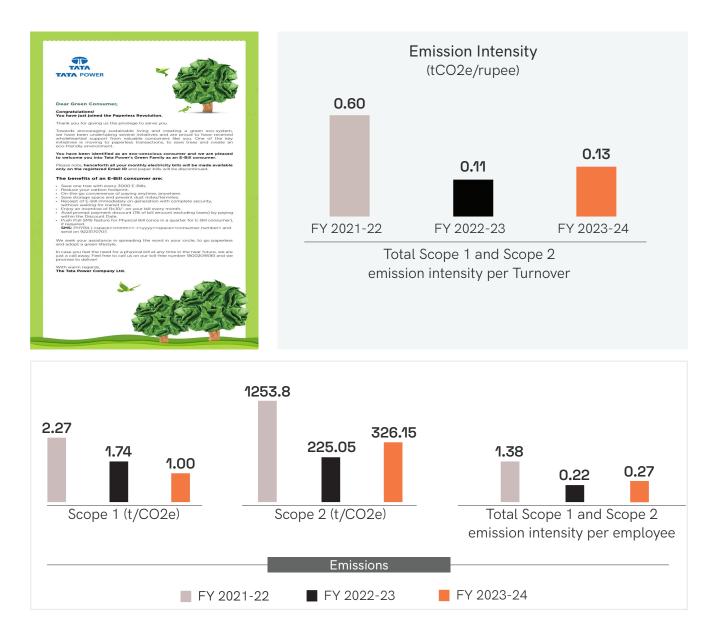




Recognizing the urgency of climate action, we endeavour to reduce our greenhouse gas (GHG) emissions and to integrate sustainable practices into the operations. To mitigate the environmental impact, 360 ONE has implemented various initiatives such as promoting video and audio-conferencing facilities to minimise the need for physical travel. The Organisation recognizes the power of digitalization in creating opportunities for sustainable practices and thus embraces these advancements wholeheartedly.

In line with the commitment to reducing business travel, we promote online meetings and collaborations. This allows us to significantly decrease our carbon footprint associated with travel while ensuring effective communication and collaboration among various teams.

The Company has also installed two EV charging points at our Mumbai office and is proud to receive the title of "Green Consumer" from TATA Power. To encourage sustainable living, the Organisation also has a car lease policy which facilitates replacement of legacy cars, periodic mandatory servicing, review and upkeep mechanisms along with leasing of new cars.



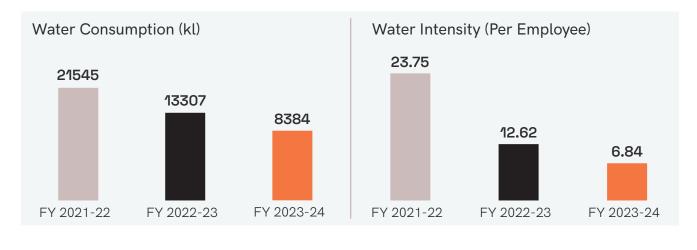
## Carbon sequestration

In financial year 2022-23, 360 ONE has initiated a project in partnership with Grow-Trees. Grow-Trees, a social enterprise aimed to inculcate the practice amongst companies and individuals worldwide to plant trees in public lands. The project aimed to plant 46,500 trees over a timeline of 10 years around the Dalma Wildlife Sanctuary in Jharkhand. The plantation will be supervised by routine audits and evaluations and a study will be conducted to evaluate the amount of carbon sequestration. Furthermore, through this initiative, 360 ONE will be able to achieve improvements in soil quality and reduction of land degradation. The initiative will also help to sustain and improve the livelihood of local agricultural communities by providing them resources from the forest in the form of fruits, fodder, timber, fuel etc.





360 ONE recognizes the importance of effective water management practices in safeguarding the environment and addressing global and domestic water scarcity challenges. Towards responsible water usage, the Organisation has implemented various strategies within the office premises. The initiatives focus on reducing consumption and promoting efficient water utilisation. These initiatives include installation of sensor-based urinals and spindles for the taps to help reduce the freshwater consumption for domestic purposes. These systems have been effective in reducing the overall consumption.



Waste

Managing waste is becoming increasingly critical for environmental sustainability and 360 ONE recognizes the need to actively address it.

The Organization's operations do not involve any usage of hazardous and toxic chemicals. However, 360 ONE monitors waste generated office and waste management initiatives such as waste segregation, waste recycling, etc. are put in place. Different types of waste are segregated and sent to respective, certified dealers for recycling, thus, diverting it from landfilling. 360 ONE has a scrap disposal process in place that guides the disposal of e-waste from its offices. E-waste disposal is carried through third party authorized E-waste handlers / recyclers (authorized by Ministry of Environment and Forests or Central / State Pollution Control Boards) who take care of the e-waste disposal from its premises.

360 ONE takes steps to minimise dry waste by reducing the use of kraft boxes and stationery paper, while encouraging employees and creating awareness to print only when required. The Organisation has encouraged the use of e-visiting cards and digital standees within the premises. It also encourages employees to avoid using disposable cups and plates by carrying their own cups and cutlery to the workplace.

All the recycling initiatives are conducted in collaboration with authorised vendors as the Organisation understands the importance of working with trusted partners who adhere to proper recycling practices and regulations.

#### Waste recycled by the Organisation



## Waste Generated

E-Waste (MT)

Parameter	FY 2023-24 (Current Financial Year)	FY 2022-23 (Previous Financial Year)
Total Waste generated (in metric tonnes)		
Plastic waste	1.89	0.1
E-waste	0.8#	0.4
Bio-medical waste	0	0
Construction and demolition waste	0	0.5
Battery waste	0	0
Other Non-hazardous waste generated.	32.19*	17.46
Total	34.88	18.46

**Note:** No independent assessment / evaluation/assurance has been carried out by any external agency. \*During FY 2022-23, wet waste was not calculated. For FY 2023-24, wet waste is calculated and the same stands at 14.3 metric tonnes.

#E-waste in considered for all the offices of the organisation whereas other waste is calculated for only Mumbai corporate office.

For more details on our environmental initiatives, please refer the Business Responsibility and Sustainability Report for FY 2023-24.

# CORPORATE SOCIAL RESPONSIBILITY

### Where Good Becomes Great

360 ONE Foundation ("Foundation") reinforces 360 ONE's commitment to leverage its core competencies to maximise both financial and social returns. The Foundation has pioneered a more catalytic approach powered by blended finance and outcomes-based financing to deliver measured outcomes and exponential impact for underserved communities.

As leaders in wealth and asset management, 360 ONE is able to leverage its expertise beyond providing mere funds as part of our responsibility to society. We are committed to maximising both financial and social returns. 360 ONE has re-imagined traditional grantgiving and evolved a more catalytic approach with CSR funds deployed to generate a higher social return by unlocking additional capital, recycling funds, co-funding, with a strong focus on measured outcomes. We vet and cocurate interventions that use

**blended finance** and **outcomebased funding** approaches to deliver exponential impact and enable a multiplier effect to the contribution made. Our goal is to improve outcomes and amplify impact for underserved communities through increased leverage of CSR funds.

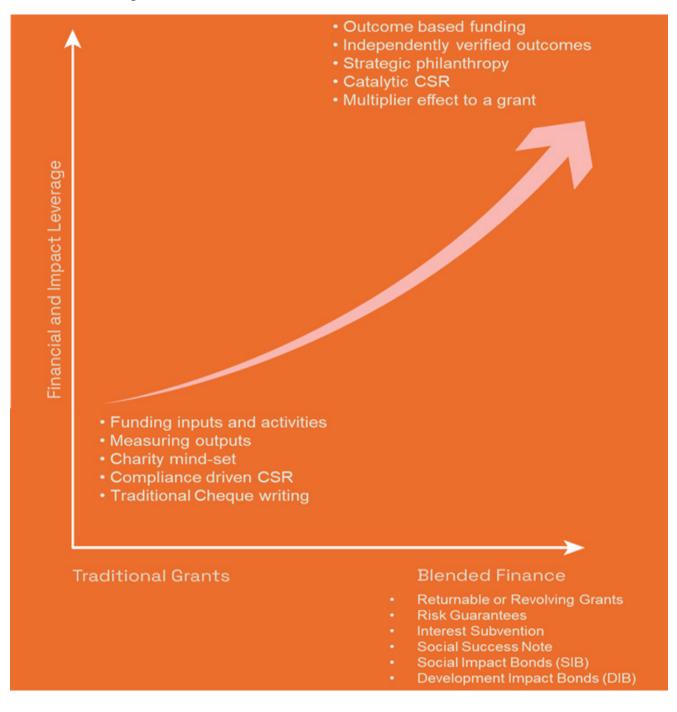
Our thematic priority is financial access and inclusion as levers to improve and rebuild livelihoods. We strive to bridge the gap between informal and formal sectors, guiding vulnerable communities towards formal credit sources.

The Foundation focuses on improving livelihoods through financial inclusion and access to capital. We strive to bridge the gap between the informal sector and formal sources of credit, enabling nano and microentrepreneurs and the informal workforce to participate and progress. We aim to achieve this by providing affordable capital to underserved communities, building a credit history for the unbanked, ensuring formal income for daily wage earners, enhancing financial literacy, encouraging savings and reducing debt traps of informal lending. We also believe in long term, holistic solutions to improve livelihoods: developing skills and capacities, establishing market and government - overlayed with linkages financial literacy, inclusion and access. 360 ONE recognises that financial inclusion plays a crucial role in reducing poverty and achieve the UN's Sustainable Development Goals (SDGs).

Blended Finance: Philanthropic funds leveraged to unlock commercial additional / governmental capital for the project thereby increasing the quantum of capital available for development financing e.g. Returnable or Revolving Grants, Risk Guarantees, Social Impact Bonds, Social Success Notes.

**Outcomes-based financing (Results-based financing):** Donor pays only if certain pre-agreed outcomes are met.

Since FY 2021-22, we have positively impacted over 1,40,000 unique beneficiaries including 29,492 beneficiaries during FY 2023-24.



# Snapshots of select FY 2023-24 interventions co-curated by the Foundation using catalytic approaches like returnable grants, risk guarantees, outcomes-based financing to optimize giving and deliver exponential impact:

#### Promoting rural entrepreneurship and microsavings among low-income migrant households

The Shram Sarathi program provided low-income rural migrant households with a low-touch enterprise training and zero-interest zero-collateral loans in the form of returnable grants (INR 20,000 to INR 50,000) to establish and grow resilient enterprises like tailoring businesses, grocery and bike repair shops. There is only a moral obligation to repay, and when returned to Shram Sarathi, the funds are recycled to the next cycle of beneficiaries. Additionally, a 20% incentive for recurring microsavings in fixed income instruments promotes financial stability for beneficiaries.

#### Key Project Components

- Location: Rajasthan
- Total No. of Beneficiaries Impacted: 850 Rural Entrepreneurs
- Training: Digital, Business, and Financial Literacy
- Total Number of Cycles (for Returnable Grants): 3

#### Project Impact Summary

- More than 80% repayment rates
- 17.79 % increase in average monthly income
- Participants saved an average of INR 3,870, with total savings through recurring deposits amounting to INR 13,79,400.

#### Additional Project Insights

- Most entrepreneurs were involved in Dairy & Agribusiness and Retail and Consumer Goods, indicating a preference for these sectors among rural entrepreneurs.
- Most recurring deposits were made in post offices rather than banks, suggesting that post offices may be more accessible or trusted by the program's participants in rural areas.

#### Beneficiary Speaks



Vanu, a resilient entrepreneur from Modpur village, transformed her sewing business with a returnable grant from Shram Sarathi. Upgrading her tools, she increased production from one to three dresses daily, doubling her income to ₹9,000. Vanu's determination and new machinery empowered her to diversify and uplift her business.

## Building sustainable Farmer Producer Companies (FPCs) by supporting production, processing, and marketing of agricultural products

The Access Livelihoods project assisted 1,600 small-holder women farmers across 4 FPCs and 3 states through a returnable grant for input supplies and purchase of produce. It supports FPCs in farming, processing, and marketing various products like paddy seeds, pulses, poultry, cashew, non-timber forest products (NTFP), and hill broom. FPC profits are reinvested in subsequent business cycles, ensuring continual income growth for the FPC and its members.

#### Key Project Components

- Location: Odisha, Maharashtra, Andhra Pradesh
- Total No. of Beneficiaries Impacted: 1,600
- Training: Farming, FPC Management
- Total Number of Cycles: 4-5

#### Project Impact Summary

- FPC Turnover Growth: Odisha led the way with a remarkable turnover increase of 154% from FY23 to FY24, growing from ₹8.7 million to ₹22.1 million. Srikakulam saw significant growth, starting from zero in FY23 to a turnover of ₹6.1 million in FY24, indicating a strong entry or expansion. Gondia experienced a solid increase of over 260%, from ₹1.1 million to ₹4.1 million.
- **Cost Reduction:** Srikakulam achieved the most substantial reduction in production costs at 6%, followed by Odisha at 3.03%, and Gondia at 2.67%. This highlights Srikakulam's efficiency in reducing farmer expenses.
- **Income Increase:** Farmers in Odisha saw the highest income gains through FPC procurement, with a 31.1% increase compared to sales to middlemen, and 7.5% compared to private seed companies.

#### Additional Project Insights

- The project focused on specific high-value crops like cashew and paddy, particularly with tailored interventions such as fine variety paddy training. This suggests a strategic focus on enhancing value for crops that have a significant market demand and higher profit margins for farmers.
- The significant turnover increases in Odisha and Srikakulam suggest that returnable grants are effectively driving FPC growth and sustainability, potentially creating a positive cycle where higher turnover fuels further investment and long-term growth.

#### **Beneficiary Speaks**



Santoshi Gadtya has revolutionized paddy seed production in Pipili village. Thanks to 360 ONE Foundation and Access Livelihoods. She now sells her seeds at higher prices under the "Creyo" brand, boosting her income and empowering her community towards economic independence.

## Empowering new-to-credit MSMEs and individuals through the development and adoption of the Pre-Credit Score (PCS)

In partnership with Samhita-CGF, we supported the development of a public good to reasonably assess the creditworthiness of the New To Credit (NTC) segment and enable their access to credit. The PCS acts as an alternative scoring framework, and offers itself as a proxy to traditional credit rating methodologies by using alternative data sources and social equity indicators. It is designed to be a steppingstone for NTC borrowers to allow graduation to formal credit sources.

The process involves administering the PCS survey to potential loan recipients, with Lending Partners (LPs) using the scores to make lending decisions. Post-lending, the loan performance is monitored, with the aim of validating PCS by comparing initial scores with repayment behavior.

#### Key Project Components

- Location: Maharashtra, Uttar Pradesh, Gujarat
- ► Total No. of Beneficiaries Impacted: 1,391 (with U-Gro, Dvara and Sewa).
- Pillars of the PCS: Capacity, Character, Connectivity, Collateral

#### Project Impact Summary

- While PCS shows promise, widespread adoption has been limited so far. The pilot programs allowed banks/LPs to test the PCS survey for lending decisions, but the full validation process
   which compares PCS scores with repayment outcomes - typically takes 2-3 years. This slower validation method is critical to proving PCS's effectiveness as a creditworthiness tool.
- CGF-Samhita, leading the implementation, has considered a faster approach by back-testing PCS scores using loan data from SIDBI's app-based lending platform, "Prayaas." This strategy could shorten the validation timeline from years to months, accelerating PCS adoption.

#### Additional Project Insights

 Once fully validated, PCS has the potential to transform how banks assess the NTC segment, leading to greater financial inclusion, especially for women and micro-entrepreneurs. By providing banks with a more holistic view of borrowers, PCS could unlock new lending opportunities, driving growth in underserved markets.

## Enabling entry of unbanked and underbanked women entrepreneurs in the formal credit system

This project, in collaboration with SEWA and Samhita-CGF, aimed to integrate 2,600 unbanked and underbanked women entrepreneurs into the formal credit system. Leveraging a 10% First Loss Default Guarantee (FLDG), the project provides working capital loans ranging from INR 25,000 to INR 75,000 through SEWA Bank. The guarantee reduces the perceived risk for low/negative credit score borrowers, enabling them to grow their enterprises and improve their livelihoods.

#### Key Project Components

- Location: Gujarat
- Total No. of Beneficiaries Impacted: ~5,000
- Training: Financial, Enterprise Management
- ▶ Total Number of Cycles (for FLDG): 2

#### Project Impact Summary

- A total of 2,600 rural women nano and micro-entrepreneurs have been benefited from enterprise loans aggregating to INR 10 crores, supported by a guarantee facilitated by 360 ONE Foundation in collaboration with SEWA Bank.
- ► 285 rural women artisans completed the Pre-Credit Score survey, which assesses the creditworthiness of the New to Credit (NTC) segment and enables access to credit.

#### Additional Project Insights

- Types of Women Enterprises: Loans were disbursed to small scale vendors and hawkers.
- Loans Disbursed: 67.6% of the total loans were disbursed to the NTC segment (1,853 participants), while the remaining 32.3% went to 747 Non-NTC participants.
- Baseline Insights: The cohort consisted exclusively of women, with a median age of 38 years. Most
  participants were engaged in non-agricultural businesses like manufacturing clothes/textiles,
  tailoring, and vending.
- Digital and Financial Profile: Many participants had access to personal phones and were beginning to adopt digital payment methods.

#### Beneficiary Speaks



Truptiben Ambalal Chunara, a 26-year-old vegetable vendor in Ahmedabad, overcame financial constraints through a Rs. 40,000 loan from SEWA. Previously struggling with limited capital and inconsistent stock, Truptiben used the loan to purchase a steady supply of vegetables, ensuring she could meet customer demand. She also diversified her income by selling dupattas from home. This expansion boosted her daily earnings to Rs. 500-800, significantly improving her livelihood.

## Improving income of small and marginal farmers by strengthening FPC through improved yield, reduced cost of cultivation, and better market linkages

The Vrutti project worked with 380 farmers and 2 FPCs in groundnut, with an aim to double farmer incomes in 5 years and increase coverage of active FPC members. This will be achieved through a blended finance structure involving debt, equity, and outcomes-based grant. Fair quality standards, reduced cultivation costs, and established connections with prominent buyers in the market are provided to strengthen FPCs.

#### Key Project Components

- Location: Tamil Nadu
- Total No. of Beneficiaries Impacted: 380
- Training: Land and Crop Management, FPC Management

#### Project Impact Summary

- Catalyst Livelihoods Ventures (CLV) farmers, on an average, earned 56.79% more than non-CLV farmers.
- Total revenue increased by 105.30% y-o-y for 1<sup>st</sup> FPC to 1.77 crores, while another FPCs revenues increased by 37.64% in the same period.

#### Additional Project Insights

- Input seed cost offered by traders is 23% more than seed cost priced by CLV helping farmers significantly cut costs.
- The outturn/quality of the groundnuts improved from 68% to 74% on average, due to the meticulous seed selection.
- CLV influenced approximately 80% of farmers in the FPC to sell their produce through the FPC instead of local traders, making a significant 20% increase compared to the previous season.
- Purchase price of produce offered by CLV was 7% more than the price offered by traders.

#### Beneficiary Speaks



Karthika Sankar, a dedicated farmer from Paramanagar, Pudukottai, faced the challenges of floods and droughts, often relying on gold loans. The program changed everything for her; now she earns INR 3,000 per 40 kg bag of produce, up from INR 2,600, and has cut her input costs by INR 2,000 thanks to regular support and discounted inputs. With renewed confidence from assured procurement, Karthika is now referring the program to fellow farmers, having already connected four others to this transformative initiative.

## Boosting farmer incomes through bamboo farming support, value addition, and sustainable farming practices

Our project with Industree Crafts Foundation empowered smallholder farmers by establishing FPCs in the FSC-certified bamboo value chain. Through training in sustainable cultivation and harvesting practices, we enhance their skills and promote regenerative land management. Over the next three years, market linkages will be provided for sustained incomes.

Key Project Components

- Location: Maharashtra
- Total No. of Beneficiaries Impacted: 300
- ▶ No. of Bamboo Saplings Planted: 18,000
- Expected Carbon Sequestration in 5 Years: 1,275 tonnes

#### Project Impact Summary

The project focuses on empowering 500 smallholder farmers through sustainable bamboo cultivation and regenerative land management, fostering social and economic growth. In partnership with Industree Crafts Foundation, 360 ONE Foundation and Rainmatter Foundation, farmers received training in sustainable practices and were provided 30,000 bamboo saplings in FY23. By FY24, 18,000 saplings were planted, and 300 farmers received additional support for land preparation and cultivation. Looking ahead, the project aims to enhance farmer skills, improve market access, and foster income diversification through intercropping with medicinal plants, targeting a 10% income increase by FY25. Additionally, 167 hectares of bamboo plantations are expected to gain FSC certification by FY26, and the project is projected to sequester 1,275 tonnes of carbon over five years. Through a pay-for-outcomes finance model, the initiative builds long-term sustainability for Farmer Producer Organizations (FPOs), ensuring continued environmental and financial resilience.

#### Additional Project Insights

The project includes a practical water management strategy, implementing a simple drip irrigation system to ensure consistent bamboo growth, especially during dry seasons. There is also a strong focus on capacity building, with ongoing training for both farmers and the leadership of Farmer Producer Organizations (FPOs) in governance, leadership, and collective management to ensure sustainable, longterm success. Additionally, the initiative is advancing carbon credit generation, with baseline data already being collected, allowing farmers to potentially benefit from carbon markets in the future.



Given our innovative approach powered by blended finance and outcomes-based financing, our programs deliver sustained outcomes even after the first cycle of grant deployment.

## GOVERNANCE

360 ONE recognizes that ethical practices are crucial in building trust with clients, regulators and the community at large. 360 ONE prioritizes ethical conduct and sound governance for sustainable organisational success. 360 ONE's operations are marked by transparency, fairness, integrity and accountability. A well-defined code of conduct guides and encourages employees to meet ethical standards and make ethical decisions with a client centric approach.

360 ONE follows high standards of governance and disclosure. It firmly believes that adherence to business ethics and commitment to corporate governance will help 360 ONE to achieve its vision of being the most respected and trusted wealth and asset management company in the financial services space in India. Company's corporate governance disclosures are described at length in the 'Corporate Governance' section of our Annual Report for the financial year 2023-24. The said report is available at the website of the Company at <u>(Website)</u>

## **Corporate Governance Framework**

The Board of Directors ("Board") of the Company represents an optimal mix of expertise, knowledge and experience. Further, the Independent Directors on the Board of the Company are respected for their professional integrity as well as rich experience and expertise. The Board provides leadership, strategic guidance and discharges its fiduciary duties of safeguarding the interest of the Company and its stakeholders. The Committees of the Board also play an important role in the governance framework of the Company and are constituted to deal with specific matters as prescribed under applicable laws and as may be referred by the Board.

## **ESG Governance Structure**

The Governance structure as specified in the Environment, Social and Governance (ESG) Policy of the Company (which is available at <u>(Website)</u>), is as follows:

The Corporate Social Responsibility (CSR) and Environment, Social, and Governance (ESG) Committee reports to the Board, inter alia overseeing the review and monitoring of sustainability goals and ESG initiatives. The committee is chaired by Mr. Karan Bhagat.

#### Board of Directors

- Establish ESG Vision
- Review and approve the ESG Policy
- Provide oversight on ESG practices

#### CSR and ESG Committee

- Review and monitor ESG Goals and Initiatives
- Suggest Initiatives to achieve Goals and KPIs

#### **Risk Management Committee**

- ► Review of ESG risks
- Identify, assess and plan mitigation of ESG risks

#### **ESG Working Groups**

- Implement ESG initiatives
- Build a conscious ESG culture
- Design and Plan ESG trainings and awareness programmes

#### **Employees**

Adopt ESG principles into operations

## **Board Selection**

The Nomination and Remuneration Policy (*Website*) serves as a guide for appointing Directors, Key Managerial Personnel and Senior Management of the Company which prescribes that the candidate should possess adequate qualification, expertise and experience for the position he / she is considered for such appointment. The said Policy also specifies detailed procedure for appointment of the Managing Director or Whole-Time Director, Key Managerial Personnel and Senior Management of the Company.

The Nomination and Remuneration Committee also ensures that appointment of Directors is in line with the Board Diversity Policy of the Company which is available on the website of the Company at: *(Website).* 

## **Composition of Board of Directors**

Board Members as	on December 31, 2024 -	. 9	
1	5	3	22%
Executive Director	Independent Directors	Non-Executive Directors	Representation of women in Board

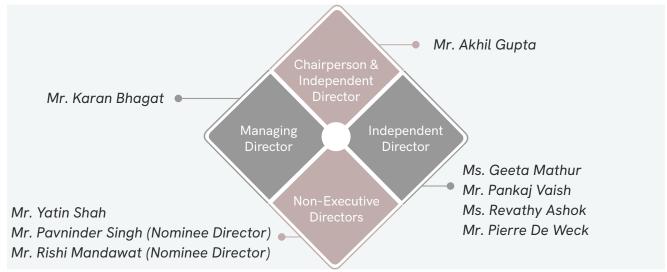
The Board of the Company has an optimum combination of executive and non-executive, independent and non-independent Directors. The **average tenure** of the Directors in the Company as on March 31, 2024, is **8.2 years**.

Between March 31, 2024 and December 31, 2024, following changes took place in Board of Directors:

Mr. Nirmal Jain and Mr. Venkataraman Rajamani ceased to be the Directors of the Company with effect from the conclusion of the AGM i.e. July 11, 2024. Mr. Nirmal Jain and Mr. Venkataraman Rajamani were liable to retire by rotation at the AGM, and in view of their personal commitments and preoccupation, they did not wish to be considered for re-appointment as the directors of the Company.

Dr. S. Narayan and Mr. Nilesh Vikamksey, Independent Directors of the Company, completed their term as an Independent Directors on June 24, 2024, and August 24, 2024, respectively, and ceased to be Directors of the Company.

The Board appointed Ms. Revathy Ashok and Mr. Pierre De Weck as Independent Directors on the Board w.e.f. April 23, 2024 and October 15, 2024, respectively.



As on December 31, 2024, the composition of Board of Directors is as follows:

As on December 31, 2024, the Company has two independent women directors on the Board of the Company i.e. Ms. Geeta Mathur and Ms. Revathy Ashok. Further, Mr. Pierre De Weck, a Swiss National, was also appointed in the Board of the Company to bring global perspective.

The Nomination and Remuneration Committee of the Company has ensured diverse combination of members in terms of age, gender, experience, nationality, expertise and other discipline related to the business, in the Board of the Company.

#### **Board Expertise**

The Board has identified the following skills / expertise / competence for the effective functioning of the Company which is currently available with the Board. The below table highlights the key skills / expertise / competence of the Board of Directors in context of the Company's business for effective functioning and as available with the Board.

Skills / expertise / competence <sup>#</sup>	Mr. Akhil Gupta	Ms. Geeta Mathur	Mr. Pierre De Weck	Ms. Revathy Ashok	Mr. Pankaj Vaish
Strategic Advisor	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$
Monetary Policy	$\checkmark$	$\checkmark$	-	-	-
Leadership	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$
Corporate Governance	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$
Risk and Compliance	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$
Financial Expertise	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$
Stakeholder Relationship	$\checkmark$	$\checkmark$	-	$\checkmark$	$\checkmark$
Technology led transformation	$\checkmark$	$\checkmark$	$\checkmark$	-	$\checkmark$
Skills / expertise / competence <sup>#</sup>	Mr. Pavninder Singh	Mr. Rishi Mandawat	Mr. Yatin Shah	Mr. Karan Bhagat	
Strategic	√			√	
Advisor					
Monetary Policy Leadership	$\checkmark$	-	$\sim$	$\sim$	
Corporate		_	V		
Governance	$\checkmark$	-	$\checkmark$	$\checkmark$	
Risk and Compliance	$\checkmark$	-	$\checkmark$	$\checkmark$	
Financial Expertise	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	
Stakeholder Relationship	$\checkmark$	-	$\checkmark$	$\checkmark$	
Technology led transformation	$\checkmark$	$\checkmark$	$\checkmark$	$\checkmark$	

# These skills / expertise / competencies are broad-based, encompassing several areas of expertise / experience as shown in the table above. Each Director may possess varied combinations of skills / expertise / competencies within the described set of parameters.

### **Board Functioning**

#### Meetings of Board

The Board meets at least once a quarter to review the quarterly results and other items of the agenda. Whenever necessary, additional Board Meetings are held. In case of business exigencies, resolutions are passed by circulation as permitted by law, which are noted in the subsequent Board Meetings.

#### Notice and Agenda

The Board and the Committees are presented with detailed notes, along with the agenda papers to enable Directors to take informed decisions. With a view to leverage technology and reducing paper consumption, the Company has implemented app-based e-meeting system, which can be accessed through secured iPad, Laptops, Mac, Mobile phones etc. to ensure easy access to the Directors. This system helps reduce consumption and paper ensures security of the matters and documents enlisted in the agendas.

#### **Compliance Reporting**

The Board periodically reviews compliance reports of laws applicable to the Company, prepared and placed before the Board by the management. The Board is also periodically updated on relevant and important regulatory requirements and the action plan of the Company in this regard.

## Post-Meeting follow-up mechanism

The Company has an effective post-meeting follow-up review and reporting process for the decisions taken by the Board and the Committees. The important decisions taken at the Board / Committee(s) Meeting(s) which call for actions to be taken, are initiated, communicated to the concerned departments and updated to the Board Committee. The action / taken report is placed at the subsequent Meeting(s) of the Board / Committee(s) for information and review by the Board / Committee(s).

#### Board Performance Evaluation

Nomination The and Committee Remuneration of the Board has laid down the criteria for performance evaluation of Chairperson, Managing Director, Non-Executive Directors, Independent Directors, Committees and Board as a whole. The performance evaluation is carried on an annual basis and the results of the same are discussed by the Board and suitable feedback is conveyed to the Board members and the management, for necessary action. The development in the focus areas identified in the previous performance evaluation is also placed before the Board. The aforesaid evaluation is carried out digitally with an attempt to reduce paper consumption. The key criteria for performance evaluation of the aforesaid are detailed in the 'Corporate Governance' section of the Annual Report of financial year 2023-24.

#### **Familiarisation Program**

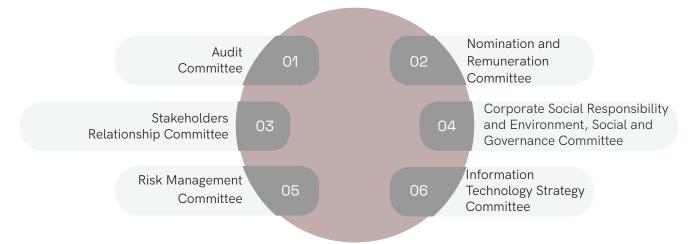
The Familiarization Programme is extended to all the Directors of the Company. The program helps Directors understand the operations of the Company better, which in turn facilitates their active participation in the Board and committee meetings to improve the decision making performance and of the Company as a whole. As part of the orientation program, scheduled meetings are between the Independent Directors and Senior Management of the Company to discuss the functioning of the Board, 360 ONE Group and the nature of the operation of the business activities of the Company and its subsidiaries.

Further as part of the continuing process, various presentations and interactive sessions are organised to familiarize the Directors inter alia with the strategy, financial performance, budgets, regulatory updates and overview of performance of business on a regular basis.

The Company endeavours to arrange a 'Learning Day' for all the Directors and Senior Management of the Company. The topics of the said 'Learning Day' are finalized in consultation with Independent Directors of the Company. First Learning Day was held on June 15, 2023, and second Learning Day was held on September 3, 2024.

## Committees of the Board

The Company has constituted various committees to enhance its governance practices and ensure oversight on the key areas. These committees play a crucial role in decision-making and contributing towards accountability and promoting transparency.



The Organisation aligns with the specific requirements and guidelines laid out in the Companies Act, 2013 and the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations of 2015. The details of the Committees, their composition, terms of reference, number of meetings held during FY 2023-24 and attendance of the members thereat etc. are detailed in the 'Corporate Governance' section of the Annual Report of financial year 2023-24.

#### Green Initiatives in Corporate Governance in line with the 'Green Initiative'

In line with the extant provisions, Company has affected electronic delivery of Notice of Annual General Meeting, Postal Ballots, and Annual Report to those Members whose e-mail IDs were registered with the respective Depository Participants (DPs) and downloaded from the depositories viz. National Securities Depository LIMITED/Central Depository Services (India) LIMITED. Company regularly encourages its shareholders to opt for digital correspondence. We believe and endorse the 'Green Initiative' as it would not only rationalize the use of paper but also ensure prompt communication, avoid loss in transit and will have reference value of the communication.

# Tax Policy and Governance

360 ONE is focused on responsibly managing its environmental economic, and social impact on society, including indirect value creation, with adherence to high ethical standards. 360 ONE's Tax Policy and Governance reflect its endeavour of being а responsible corporate citizen, outlining its approach towards taxation. It ensures compliance with relevant tax laws and regulations in all operating countries to avoid tax risks and inefficiencies in the implementation of business decisions.

This includes timely payment of legally required taxes, utilizing tax agreements and reliefs provided by relevant governments and engaging with tax authorities during audits.

Transparency is maintained by promptly providing requested tax-related information to establish accurate tax liabilities. The Organisation maintains open and transparent tax structures within the boundaries of rules and regulations and aligns Tax Policy and Governance with its business and commercial Personnel strategies. responsible for tax matters receive appropriate training and access to external experts to fulfil their tax responsibilities effectively.

The details of the Tax Policy and Governance have been disclosed on the website of the Company at <u>(Website).</u>

## Code of Conduct and Business Ethics

The Company has adopted Code of Conduct for board and senior management under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The said Code is adopted to ensure that the directors and the senior management maintain high ethical standards and transparent process in managing the affairs of the Company, to sustain the trust and confidence reposed by the shareholders of the Company. Recognizing the importance of maintaining a reporting mechanism, our Code of Conduct for board and senior management empowers them to report any violations or suspected violations directly to the chairman of the Audit Committee / Board. The said Code is available on the website of the Company at (Website).

360 ONE has put in place Code of Conduct for employees (as

part of 'Workplace Guide' available on the intranet) which inter-alia focuses on best emplovment practices and respecting the human rights of the employees, avoids causing or contributing to adverse human rights impact, and addressing such impacts as and when it occurs. The said Code of Conduct is in adherence to the regulatory and business requirements.

## Anti-Corruption

360 ONE has a zero-tolerance approach to bribery and corruption and is committed to act professionally, fairly and with integrity in all the dealings wherever the Organisation operates. The Organisation is also committed to implement and enforce effective systems to counter bribery. In order to combat corruption and to conduct our business in an honest and ethical manner, 360 ONE has adopted anticorruption policy, which is applicable to all the employees, including directors of the company. The parties who fail to comply with the policy will be charged with disciplinary action and both the offender and the Organisation may face legal or regulatory action. The said Policy is available on the website of the Company at (Website).

The Organisation also conducts

training on anti-bribery for key managerial personnel and concerned employees. In FY 2023-24, no disciplinary actions were taken against directors, key managerial personnel and employees for the charges of bribery / corruption.

## Policy on Vigil Mechanism and Whistle Blower Mechanism

360 ONE is committed to developing a culture where all its stakeholders, including employees, vendors, directors, suppliers, service providers, contractual staff, feel secure about raising concerns with respect to any poor or unacceptable practice and any event of misconduct. To ensure this, 360 ONE has a Policy on Vigil Mechanism and Whistle Blower Mechanism which provides for nature of issues covered, available reporting channels to report an incident, steps along with expected timelines for resolving concerns reported and measures available to safeguard against victimization of the whistle blower who avails of such mechanism. To facilitate reporting of any concerns without any hesitation and maintaining of anonymity, the Company has engaged an external independent agency for managing ethics helpline under the aforesaid mechanism. The said Policy is available on the website of the Company at <u>(Website).</u>

360 ONE also conducts training on whistle blower mechanism for key managerial personnel and employees.

Further, no whistle blower complaint was received by 360 ONE during the financial year 2023-24.

#### Best Practices by 360 ONE:

- An external independent agency available 24/7
- Available in local languages
- Available to suppliers, customers and other third parties
- Disclosure on the number of reports received the types of misconduct and measures taken
- Non-retaliation policy
- Anonymous reporting, treated confidentially
- Proactively communicated to employees
- Structures in place to process whistle blower report
- Quarterly reporting of any whistle blower complaint(s) to the Audit Committee
- Accessibility of ethics helpline through phone, e-mail, web portal, post box and Quick Response code.

## Conflict of Interests

A conflict of interest arises when an employee's personal interests' conflict with that of the Organisation or its clients, or the interests of the Organisation conflict with the interests of 360 ONE's clients.

То manage such conflicts of interest and ensure that conflicted transactions take place in a fair manner, all the related party transactions are approved by the Audit Committee Board and / reporting disclosures and requirements are complied with, as per the requirements of the Companies Act 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. 360 ONE also has a Conflict of Interest Policy under which a Conflict Resolution Advisory Board (CRAB) is constituted to approve other conflicted transactions.

The Conflict of Interest Policy lays down a framework for conducting business and operations with guiding principles of fair practice and risk mitigation for resolution of potential and actual conflict of interest. The said Policy is available on the website of the Company at (Website). 360 ONE also conducts training on conflict of interest for key managerial personnel and concerned employees.

## Prevention of Insider Trading

360 ONE has formulated and adopted 'Code of Conduct for Employees and Insiders of 360 ONE WAM LIMITED and its Subsidiary & Associate Companies' under SEBI (Prohibition of Insider Trading) Regulations, 2015, for prevention of the insider trading.

The aforesaid Code of Conduct constitutes the body of rules and principles, which are to be followed by employees including designated persons and insiders of 360 ONE WAM LIMITED and its subsidiaries. As part of our ongoing commitment to promote ethical behaviour and compliance, annual training is provided to all employees on prevention of insider trading and compliance with the aforesaid Code of Conduct. Furthermore, the Board of Directors of 360 ONE has formulated a Code of Conduct for fair disclosures which is required to be adhered to by all the people who are directly or indirectly associated with the Organisation, which is available on the website of the Company at (Website).

## Anti-Money Laundering Policy

Anti-Money Laundering ("AML") Policy of 360 ONE provides a framework, which helps the Organisation to develop procedures that are appropriate to its business and maintain uniform practices to ensure that the Organization adheres to the minimum requirement out laid by Securities and Exchange Board of India in this regard. The AML Policy also provides clarity on Know your Customer (KYC) standards and AML measures, outlines the obligations of 360 ONE under Prevention of Money Laundering Act, 2002 (PMLA) and align its operations with international standards and practices. This policy broadly covers distribution, advisory, broking, depository participant, investment banking and trust services businesses. The annual trainings to concerned employees also include trainings on AML. 360 ONE has AML Committees for various businesses to deliberate on client onboarding.

## Investor Grievance Redressal Framework

The Company has established an investor grievance redressal framework in order to ensure that (a) all investors are always treated fairly and without bias and (b) investors are made aware of their rights so that they can opt for alternative remedies, if they are not fully satisfied with the Company's response or resolution to their complaint. Said framework is available on the website of the Company at (Website).

The said framework broadly covers the processes for receipt, resolution and escalation of grievances as may be raised by the investors of the Company.

In 2023-24, all investor grievances were resolved well within the statutory timelines.

# RISK MANAGEMENT

360 ONE recognizes the importance of risk management as a vital function that equips the Organisation with the necessary tools to effectively address potential risks and to ensure stability and success of the Organisation.

360 ONE is committed to fostering a risk-aware culture and has prioritised the identification, assessment and management of risks across all operations.

The Organisation addresses the key foreseeable risks (both financial and operational risks) that it is likely to experience in the course of its business with mitigating factors and controls that have been implemented to manage the said risks.

360 ONE has in place a mechanism to identify, assess, monitor and mitigate various risks to key business objectives, which includes a risk management team at the Company level and dedicated teams at key regulated subsidiaries like Asset Management and the Non-Company. Banking Finance risks Kev are identified, documented and discussed at the meetings of the Audit Committee, Risk Management Committee and Board of Directors of the Company. The key risks are addressed through mitigating actions on a continuous basis. The internal processes are designed to ensure adequate checks and balances and regulatory compliances at every stage. Authority matrices are defined flowing down from the Board Directors, provide of to authority to approve various transactions.

360 ONE proactively reviews and updates its Risk Management Policy to ensure its effectiveness in mitigating potential risks and emerging challenges in a business landscape that is dynamic and constantly evolving. The Risk Management Policy of the Company specifying the risk governance structure, key risks and mitigation measures, is available on its website at (Website).

With a diverse range of services including Stock and Commodities Broking, Asset Management, Insurance Broking, Trusteeship and Family Office, Investment Advisory and Lending Solutions, it is imperative that the Organisation detects potential risks and opportunities and takes corrective action through efficient risk management practices.

### **Risk Governance Structure**

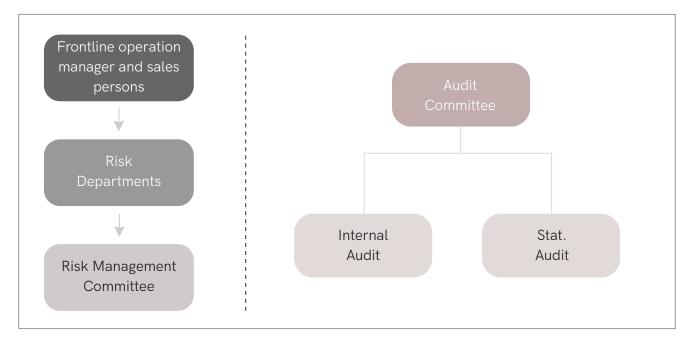
360 ONE has established a Risk Governance Structure comprising three levels across the Organisation to effectively manage risks.

The first level of risk management is carried out by frontline operations managers and sales personnel. They adhere to the rules, policies and procedures in their interactions with clients. By following these guidelines, they contribute to mitigating risks and ensuring compliance with regulatory requirements.

The second level consists of dedicated risk management departments and committees. These teams are responsible for actively monitoring and assessing risks, implementing risk mitigation strategies and providing regular reports to senior management. Their role is to identify emerging risks, analyse their potential impact on the Organisation and develop appropriate measures to address them. They play a critical role in ensuring that risk management practices are embedded throughout the Organization. Further, a Board-level Risk Committee Management (RMC) oversees the overall risk management framework. The RMC ensures that the management practices risk align with the Organisation's strategic objectives. It monitors and evaluates management practices and controls related

to finance, operations, sectorspecific risks, sustainability, as well as information and cybersecurity risks.

Thirdly, to further strengthen internal risk management, audits are conducted. These audits assess, monitor and mitigate risks bv reviewing processes, controls and practices within the Organization. The Risk Management department assists in defining the audit's scope, oversees its execution and keeps tab on the resolution of open audit points. Internal Audit reports are presented to the Audit Committee of the Board by the Internal Auditors directly.



By implementing this multi-level Risk Governance Structure, 360 ONE ensures that risks are effectively managed, monitored and mitigated across the Organization.

## **Risk Management Process**

We have a central Risk Management department that reports to the Chief Operating Officer and the Boards and/ or Audit Committees of the Company and its subsidiaries.

Further, there are separate Risk Management heads for the Wealth, Lending and Asset Management businesses to focus on the risks pertaining specifically to those businesses.

Risk Management relies on internal controls the built into Standard Operating Procedures and the Risk Product Management, and Investment Policies relating to the various businesses: e.g., the Broking Risk Management Policy, the Mutual Fund (MF) Risk Management Policy, 360 ONE Prime Policies pertaining to Loan Against Shares, Loan Against Property and Unsecured Lending and Investment Manuals and Policies that exist for our NBFC and Asset Management Company. Key risk metrics that track the principal risks faced by the various businesses are reported to the RMC at a group level, on the basis of certain pre-approved thresholds. This enables the Board level RMC to monitor that risks are being managed at an acceptable level and prompt the Management to take action whenever things start going out of line.

#### Risk Management process at asset management business

SEBI has mandated a risk management framework for the mutual fund business. The asset management business has а risk management framework which covers the key risks to the mutual fund business and also the AIF and PMS businesses. The Board level risk management committees at 360 ONE Asset Management Ltd. and 360 ONE Asset Trustee Ltd. are constituted as per the SEBI risk management framework. The terms of reference of these RMCs as defined by SEBI provide a governance structure to comprehensively review all risks pertaining to Investments, Operations, Technology, Compliance & Customer service. The RMC of 360 ONE Asset Trustee Ltd. also reviews the risks of 360 ONE Alternate Asset Management Company Ltd . Risk appetite statement defines the risk thresholds (Red/Amber/Green) for reporting to the AMC & Trustee Board RMCs. The Chief Risk Officer (CRO) of the asset management business is part of the key internal committees viz. investment committee,

valuation committee, technology committee and risk management committee. Technology committee reviews the progress of Cyber audit, Information Security audit and Technology audit. Key observations from these audits are also submitted to SEBI with a timeline for remediation.

## Risk Management process at lending business

360 ONE Prime LIMITED has a board approved Risk Management Policy and a Risk Appetite Statement which acts as a framework for identifying, assessing, measuring and reporting various elements of risk involved in the business.

360 ONE Prime LIMITED has constituted a Risk Management Committee (RMC) in accordance with the guidelines issued by Reserve Bank of India. The RMC has overall responsibility of overseeing the risk management, approving risk measurement methodologies and appropriate policies and procedures across 360 ONE Prime LIMITED. The Chief Risk Officer (CRO) of 360 ONE Prime LIMITED, places his report on a quarterly basis before its Risk Management Committee.

#### **Risk Matrices**

The Risk Management Committee (RMC) at 360 ONE WAM LIMITED. takes proactive approach а to monitor and measure risks by employing various metrics systems. Firstly, and kev risk issues and regulatory updates are presented to the RMC, providing a comprehensive understanding of their potential impact on the different businesses within the Organization. This allows RMC to assess the significance of each risk and determine appropriate mitigation strategies. Secondly, certain key risk metrics are presented to the RMC beyond certain threshold using Red-Amber-Green (RAG) framework.

Thirdly, a management information system is implemented and presented to the Management Committees and senior management of the subsidiaries. This system aids in the identification, monitoring and mitigation of risks across the Organization.

RMC of 360 ONE WAM LIMITED reviews the risks at the Company and at the subsidiary level through risk metrics reporting. Risk incidents originating at the subsidiary and classified as RED are reviewed by the RMC of the Company apart from them being reported to the RMCs of subsidiaries, as applicable. By utilizing these metrics and management information systems, RMC enhances its ability to track risks, evaluate their potential impact and implement necessary measures to mitigate them. This proactive approach helps to safeguard the Organization's operations, protect stakeholders' interests and ensure the stability and success of the business.

#### Audit

Risk Management team conducts internal reviews (using external Chartered Accountants, where required) of various aspects of the business, which include areas such as documentation in relation to the lending business; compliance with various regulations in AIF and checking of certain regulatory filings.

The scope of internal audit covers all aspects of business including regular front-end and back-end operations, HR, Finance, customer service, IT and checking for both regulatory and internal compliances. Internal audit team conducts risk-based audits across various processes. They also assess the state of internal financial controls and provide their opinions.

360 ONE has ensured that its internal audit and control

systems are adequate and commensurate with the nature of business, regulatory prescriptions and the size of its operations.

The Internal Audit of the Company and subsidiaries is conducted by an external and independent firm, as per the scope suggested by Audit Committee(s) of the Company and its subsidiaries and approved by the respective Boards. In the case of 360 ONE Prime LIMITED, from FY 2022-23, it is being conducted by a Head-Internal Audit, as per RBI guidelines with the assistance of external auditors.

For FY 2023-24, Internal Auditors tested the design and effectiveness of the key controls and no material weaknesses were observed in their examination. The internal audit reports are directly presented to the respective Boards' Audit Committees by the Internal Auditors. In addition, the Organisation complies with the several specific audits mandated by regulatory authorities such as SEBI / Exchanges/Depositories and the reports are periodically submitted to the regulators.

Further, statutory auditors verified the design and implementation of controls and tested the operating effectiveness of controls for material transactions, account balances and disclosures and have confirmed that they did not have any significant or material observation in relation to deficiencies in design and / or effectiveness of controls. The Audit Committee of 360 ONE WAM also holds one-onone sessions with the statutory auditors of the Company.

#### ESG Risks

360 ONE recognizes the nexus between its business and the economic prosperity of the country, which is influenced by various factors such as natural environmental factors like climate change, air and water pollution and health and social development and other ESG parameters. The Organisation understands the significance of these factors and the challenges they present and endeavours to integrate them into the risk and governance framework for delivering long- term value to its clients and shareholders.

The Legal, Compliance, Secretarial and Risk Management teams have created a framework to ensure compliance with regulations and minimise legal or regulatory penalties. Considering the businesses 360 ONE operates in, they are responsible for monitoring risks related to mis-selling, money laundering, conflict of interest, credit and investments.

Furthermore,

Organisation's processes and systems undergo regular audits by an internal auditor to ensure compliance and effectiveness. 360 ONE has also procured insurance coverage to protect against Professional Indemnity claims and cases related to any potential internal fraud, providing an additional layer of risk mitigation.

the

## Business Continuity and Disaster Recovery

ONF has established 360 comprehensive **Business** а Continuity and Disaster Recoverv (BCP/DR) Plan across the Organisation. This plan encompasses multiple facets, including disaster management, mitigation and preventive measures, all aimed ensuring uninterrupted at business operations.

A key component of the BCP/ DR Plan is the formation of a Business Continuity Crisis Management Team (BCCMT). The BCCMT comprises individuals who have specific roles and responsibilities within the Team. These members are tasked with invoking the BCP and leading the recovery efforts in times of crisis. Their functions include assessing the situation, coordinating response actions, communicating with stakeholders and overseeing the restoration of operations.

The BCP/DR Plan incorporates a business impact analysis process, which helps identify critical functions and systems, assess potential risks and determine the maximum tolerable time required to restore business operations. It also specifies the maximum tolerable time for acceptable data loss to ensure data recovery aligns with business needs.

The plan also addresses backup arrangements for various systems, including data backup and recovery strategies. It outlines provisions for remote working, such as work-fromhome arrangements and the necessary IT infrastructure support to facilitate remote operations. It clearly indicates the details of key contacts who need to be notified when the BCP/ DR is invoked, ensuring efficient communication and coordination crisis during situations.

# DIGITAL INITIATIVES

The rapid advancement in Al and the movement towards effortless user experience is taking the world beyond digitization. With data, models and compute being the building blocks; and compute and models available on demand, organizations are now focused on unlocking the potential of enterprise data. Achieving data liquidity is the new differentiator as is pivoting from a process digitization to non-linear human centric engagement design. With AI and multi-modality making intelligence available to all; the world seems equally accessible and visible to all.

In a world where everything seems to be changing rapidly, a few things never change – trust, and effortless impactful experience.

What the internet did to ERP, AI is doing to Software as a service (SaaS). With this understanding 360 ONE is focused on breaking down linearity in workflows; leveraging AI through digital agents; unlocking data; and, applying language and critical reasoning available in Large Language Model (LLMs) to enterprise data to achieve impactful insights.

Access to markets, product design, personalization, and, most importantly bringing the

human and machine together to deliver meaningful insights continue to be our focus. We have moved all our critical platforms to the cloud, thereby leveraging the speed, scalability and failover capabilities offered by the cloud. With deep monitoring across all layers of technology, we have achieved a high maturity score on regulatory compliance and cyber risk resiliency.

Our goal is to leverage both cloud native and AI native platforms to build agentic platforms that make data and decision support available to all users on demand through language-based query models.

rapidly matured We have ability to centralize our and distribute data at scale through use of master data management, data warehouses and visualization platforms. For both our Wealth and Asset Management business, we are now able to handle complex data scenarios which involve mashing up large volumes of layered third party data all moving at different speeds with complex layered cross platform, cross product internal data, also moving at different speeds. With these foundational capabilities in place, we are beginning to unlock the power of data within the enterprise.

Our front office, order management and execution systems which were primarily focused on serving the Ultra High Net worth Individuals (UHNI) segment are maturing to bring in greater functional and digital depth required to accommodate the larger High Net worth Individuals (HNI) Segment that exhibits different digital behaviors.

360 ONE's WhatsApp bot, NEO, enhances functionality and improves the overall client experience. NEO simplifies financial transactions bv allowing investors to initiate actions such as purchasing or redeeming units through a streamlined process. This facilitates swift and efficient execution of transactions. Additionally, NEO provides investing clients with the ability to check the status of their transactions, verify their KYC compliance and access tax-related information, contributing to a comprehensive and hassle-free investor experience.

Furthermore, NEO acts as a valuable source of up-to-date market information, including the latest market updates, details on New Fund Offers (NFOs) and other relevant insights that investors may find beneficial for making well-informed investment decisions.

# CYBER SECURITY

## Data privacy and information security

Data privacy and information fundamental security are within the elements organization's business, serving as crucial foundations for fostering trust, safeguarding sensitive information, and minimizing potential risks. 360 ONE, prioritizes and upholds robust practices in data privacy information and security, which instil confidence among stakeholders involved. all The ongoing focus involves researching and developing cutting-edge technologies that enable the organization effectively mitigate the risks associated with system failures, information security breaches, and potential cyber-attacks.

The Organization has taken meticulous measures to establish a comprehensive system that actively guards against hacking attempts, data leaks, and security breaches. Furthermore, range of checks and balances have been implemented to consistently monitor and promptly report any violations that may occur. 360 ONE has implemented a comprehensive range of security measures under the supervision of its Technology team to effectively mitigate the risk of cyber-attacks and prevent unauthorized access to and leakage of sensitive information. Notably, the organization has deployed a robust firewall and Intrusion Prevention Systems to fortify its network infrastructure. In addition, stringent policies governing perimeter device security have been put in place, restricting access to personal email accounts, social networking platforms, data sharing websites, as well as USB and local drives. To ensure data integrity and centralized document management, employees are mandated to save their working files exclusively on the organization's administered OneDrive platform. Furthermore, while mobile phones allow access to email accounts, the storing of files or attachments on such devices is strictly prohibited. Given the substantial volume of electronic transactions processed daily, technology plays a vital role in facilitating seamless operations. Consequently, the organization has established comprehensive audit procedures to assess the effectiveness of its IT systems and controls. The audit primarily emphasizes Access Security, encompassing robust measures to regulate privileged access, as well as Program Change controls and Network Operations.

То effectively mitigate the risk of cyber-attacks and prevent unauthorized access and leakage of sensitive information, 360 ONE has implemented extensive an range of security measures overseen by its Technology team. The central component of the security infrastructure is a robust firewall and Intrusion Prevention Systems, bolstering the protection of their network. Moreover, the organization has enacted stringent policies governing perimeter device security, which restrict access to personal email accounts, social networking platforms, data sharing websites, USB

drives, and local drives.

In adherence to the regulatory obligations set forth by the Reserve Bank of India (RBI), Prime ONE 360 Limited established various has committees, including an Information Technology Committee, an Asset-Liability Management Committee, and a dedicated Risk Management Committee. The organization places significant emphasis on maintaining compliance with information security standards. As part of this commitment, regular Information Security Awareness sessions and training programs are conducted to cultivate a culture of vigilance and prevent data theft, leakage, or the introduction of malicious content that could disrupt the organization's operations.

To further bolster information securitv practices, an Information Security Committee has been instituted. This committee is responsible for examining and addressing exceptional cases where employees inadvertently transmit confidential data. Their objective is to ensure that appropriate actions are taken promptly to mitigate potential risks and safeguard sensitive information. In FY 2023-24 there were no Breaches of Customer Privacy and Losses of Customer Data

#### Information Security Policy

Recognizing the crucial role of every employee in managing cyber threats, the Organisation has developed a detailed Information and Cyber-Security Policy which is available on the website of the Company at (Website).

The rules policy outlines and regulations pertaining to web server security, log management, network and internet security and email security. То foster awareness and preparedness, the Information and Cyber Security department conducts training programs using diverse methods, including classroom sessions, virtual classrooms, learning management systems, emailers and simulated phishing campaigns. Βv engaging the entire workforce, 360 ONE strives to create a culture of cybersecurity vigilance and maintain a strong defence against cyber threats.

#### Highlights - Cybersecurity Programme

- Governance structures in place for cybersecurity management
- Operational measures to monitor and respond to data breaches and cyberattacks
- Regular employee awareness trainings and assessments to simulate real world scenarios
- Regular Audits to assess the Cyber Security posture
- Continuous Vulnerability assessments of the Organisation's systems, products and practices affecting user data
- Implementation of next generation technologies at each layer of Cyber Security to better protect client data and ensure privacy



# RESPONSIBLE INVESTING

### **Real Estate**

Infrastructure and commercial real estate will continue to thrive as an integral part of India's growth story. 360 ONE assists its clients in making investments in quality partnerships and tailormade solutions. Responsible investment is a core principle permeates that into our Organization and guides our approach across various asset classes, including real estate. Our approach is as follows:

#### Environmental and Social Risk Assessment (ESRA):

An ESRA checklist is employed to conduct a detailed assessment of the project's environmental and social aspects. This assessment aims to identify specific areas of concern and potential risks.

#### **Mitigation Measures:**

Based on the findings of the ESRA, potential mitigation measures are formulated. These measures are designed to address the identified risks and promote responsible practices throughout the project's lifecycle.

#### **E&S Action Plan:**

An E&S action plan is developed to implement the identified mitigation measures and ensure responsible practices are followed. This plan serves as a roadmap for integrating environmental and social considerations into the project's operations.

Regular bi-annual verification and annual audits are undertaken to monitor the project's adherence to E&S standards. These audits ensure the ongoing observance of responsible investment principles and provide updates.

These assessment tools serve as invaluable resources, empowering us to make wellinformed decisions when considering real estate projects, Real Estate Investment Trusts (REITs) and Infrastructure Investment Trusts (InvITs).

## **Public Equities**

In Asset Management, public equities play a significant role in investors' portfolios. We manage client funds with a focus on the Indian public equities market, spread across various formats like Mutual Funds, Portfolio Management Services, and Alternative Investment Funds. Hence, assessing ESG risks and opportunities associated with these investments is crucial. lt′s important to evaluate both the industry and specific companies to effectively address these risks.

In our investment philosophy, we emphasize on maintaining a structured approach, including for our perspective on ESG. We understand the existence of ESG risks and their significant impact on a company's financial performance. We consider understanding and analyzing these risks as an integral part of our analysts' responsibilities. In fact, we believe that gaining a deeper understanding of ESG risks, while also identifying potential opportunities, can provide us with a valuable edge in the investment landscape.

When it comes to our ESG framework, we prioritize three key components.

- Scoring: We source ESG scores from a reputable company whose scoring system aligns with our investment philosophy. This scoring process involves evaluating the environmental impact, social responsibility, and corporate governance practices of potential investments. By utilizing these scores, we gain insights into the FSG performance of companies and their relative ESG risk levels.
- Engagement: We believe in actively engaging with companies to address ESG risks and encourage sustainable business practices. Our engagement efforts take two forms. During meetings with company representatives, our analysts proactively discuss any significant ESG risks. This engagement helps raise awareness and facilitates dialogue on relevant ESG topics.
- Voting: Where applicable, we exercise the proxy voting mechanism to adverse vote against decisions related to board composition, management compensation, etc. We also selectively engage

with companies when there are serious concerns. Currently, there is no explicit policy around divestment, however, any persistent governance issues would translate into eventual disinvestment.

By combining the scoring component, which provides quantitative ESG metrics, with the engagement component, which allows for qualitative discussions and knowledge exchange, we aim to thoroughly evaluate potential investments' ESG performance. This approach ensures that our investment decisions are wellinformed, aligned with our clients' values, and promote sustainable and ethical practices.

In certain investment mandates, we may integrate the ESG framework further, by tailoring it to meet specific requirements emanating from the investment mandates. For example, if an investment mandate so requires, we may maintain an aggregated ESG risk score that is better than the benchmark ESG risk score, as specified. By incorporating such mandatespecific considerations, we ensure that our investment decisions not only adhere to our overall ESG framework but also reflect the specific

requirements of the client or mandate.

During our engagements with companies, we utilize "What-Why" framework а delve into their ESG to practices. The "What" aspect focuses on understanding the specific actions and initiatives undertaken by the company in relation to ESG. For example, we explore if the company has set goals to become carbon neutral and, if so, how they plan to achieve it. We seek to understand their strategies, such as investing in renewable energy sources, implementing energy efficiency measures, or utilizing carbon credits. By comprehending the "What" of their ESG efforts, we gain insights into the concrete steps which they are taking to address the sustainability challenges.

On the other hand, the "Why" component of our framework is designed to uncover the motivations behind company's sustainable а practices. We believe that understanding the incentives driving their ESG initiatives is crucial in assessing their longterm sustainability, particularly during challenging times. For instance, is the company implementing sustainable practices because it is the right thing to do? because it makes economic sense? or because others in the industry are doing it? By gaining insights into the underlying motivations, we can better evaluate the authenticity and durability of their sustainable practices.

ESG is а dynamic field that continuously evolves address to the changing landscape of sustainable investing. At 360 ONE, we recognize the importance of staying up-to-date with the latest developments and insights in ESG. To foster continuous learning and knowledge sharing, we have conducted sessions within our team, exploring various dimensions of ESG and its impact on investment decisionmaking. These interactive sessions facilitate the exchange of perspectives, enhance our understanding of the complexities surrounding ESG considerations, and enable us for continuous ESG integration.

In addition to internal sharing, knowledge we actively engage in thought leadership activities. Recently, we conducted an in-depth analysis of the Indian water crisis, exploring the factors that contributed to the crisis and studying the actions taken by companies in response. Through such deep dives

into critical topics, we aim to generate valuable insights and share our findings.

Furthermore, our engagement efforts extend beyond knowledge sharing. We strive to cultivate and cross-pollinate good sustainable practices by actively engaging with companies and stakeholders. By fostering dialogue and encouraging best practices, we hope to drive positive change and contribute to a more sustainable future.

## **Private Credit**

Corporate Credit or lending to corporates in India is massive in size. The corporate credit market in India encompasses a wide range of credit categories, each serving distinct needs and offering varying levels of risk and return. Corporate Credit can largely be categorised into three:

- High-grade credits, which are typically issued by large, highly-rated companies with AAA or AA ratings. These investments are considered relatively safe and offer lower yields, typically ranging from 7 to 9%,
- Performing private credit, which focuses on providing tailored debt opportunities to mid-market companies, conglomerates large and diversified industrial houses. This segment offers flexible bespoke lending solutions and presents low to mediumrisk opportunities with a potential to generate high returns, typically ranging from 13 to 17%,
- Lastly, there is distressed credit which is a highrisk high reward segment involving investing in companies facing financial distress with a potential for turnaround.

At 360 ONE, we focus on the 2nd category of performing credit, which is at an inflection point and has been gaining momentum as an attractive asset class for investors seeking higher returns than traditional fixed-income instruments. Our private credit strategy focuses on leveraging AIF vehicles and PMS to pool investors and deploy capital in bespoke secured fixed-income transactions with a strong emphasis on deep origination and structuring expertise.

Our investment diligence encompasses various aspects, starting with a detailed analysis of the company's financial statements to evaluate its financial performance and identify any significant liabilities. Along with this we meticulously assess the legal documents and agreements to establish a robust credit structure, granting access to collateral. Additionally, inselect cases, commercial diligence is carried out to evaluate the overall governance of the company and the credibility of its promoters.

Today, there is increasing importance on ESG practices in investment decisionmaking as incorporating ESG considerations enables investors to align their capital with companies that prioritize environmental stewardship, social responsibility and strong governance. This approach not only mitigates risks but also promotes positive impact and long-term value creation.

We, at 360 ONE, have started taking steps to integrate ESG in our investment process. As part of the diligence and risk identification process, we also look at significant environmental or social risks that could potentially impact the creditworthiness of the underlying investment (e.g., community re-location, environmental approvals to conduct business, etc.), which are captured in the Investment Note. This note is reported to the Investment Committee to ensure all potential risks, including environmental and social factors, are considered as part of the overall decision-making By incorporating process. these risks and evaluating any available mitigants, we aim to make informed investment decisions that take into account the potential impact on both financial performance and environmental/social sustainability.

Going forward, we aim to develop a detailed ESG framework across the entire investment life-cycle to ensure the comprehensive integration of environmental, social and governance factors i.e. Identification of ESG parameters or transition plan during initial diligence, identification of ESG risks and mitigants at the time of the investment decision and finally, during portfolio monitoring, undertake value creation activities and actively portfolio encourage our adopt ESG companies to standards and prioritize sustainability.

## Impact Creation

Our track record speaks to the strength and success of our approach. We manage over INR 8,345 Crores in assets and have maintained a remarkable track record of zero delinquency during FY 2023-24. As of March 31, 2024, 34% of our Assets Under Management are dedicated to sectors that generate positive social and environmental impact.

Our lending solutions in environmental/social impact sectors include:

 Supportingone of the largest microfinance institutions in India, enabling them to provide financial services to rural households and communities, promoting financial inclusion and economic empowerment.

- Partnering with one of largest renewable the energy companies in the country to develop a green hydrogen plus ammonia This plant. investment contributes to the growth of clean and sustainable energy sources, reducing emissions carbon and promoting environmental sustainability.
- Collaborating with a leading hospital chain, aimed at improving healthcare access and quality, enhancing medical infrastructure and contributing to the wellbeing of communities.

Through these investments, we are actively driving positive change by supporting initiatives that align with our commitment to social and environmental responsibility.

## **Private Equity**

Private equity is a form of alternative investment that involves the acquisition of equity stakes in privately held companies. It plays a crucial role in fostering entrepreneurship, driving innovation and fuelling economic growth. Private equity has recognized the rising significance of integrating ESG practices into its investment strategies. ESG considerations involve assessing the environmental impact, social responsibility and corporate governance practices of target companies. By incorporating ESG factors into their decisionmaking, private equity firms seek to create enduring value that benefits both investors and society as a whole. This approach acknowledges the growing understanding that responsible investing can lead to positive transformations, mitigate risks and improve the overall performance and resilience of portfolio companies.

360 ONE Asset is one of India's largest alternate assets managers. We have a premier venture capital and private equity business. Our unique, end-to-end private market platform extends from Seed venture capital to growth equity to pre-IPO investments. Over the past nine years, we have backed several market-leading companies with a focus on technology, financial services, healthcare and consumer industries.

portfolio Our companies operate in wide range of sectors including a few asset-heavy sectors like manufacturing. 360 ONE Asset is committed to responsible investing, as outlined below. Governance holds significant importance in all our venture capital and private equity deals. Prior to funding any deal, we conduct comprehensive integrity, accounting, tax and financial due diligence. Our strong focus on governance ensures transparency and accountability throughout the investment process. Moreover, we conduct legal due diligence to identify any potential risks and liabilities associated with the investment. We use reputed third-party consultants to assist us with due diligence work streams. Their scope work includes various of environmental and social aspects such as evaluating adherence to environmental laws, labour and employment practices, POSH (Prevention of Sexual Harassment), maternity benefits and other relevant regulations. Our rigorous due diligence process helps us make informed decisions and mitigate any potential risks that may arise in the future.

Our portfolio includes pre-IPO companies and listed companies that already adhere to certain ESG mandates.

ESG integration is a holistic approach to investment analysis where traditional fundamental analysis is combined with material ESG factors to take informed an investment decision. It does not preclude investment in a company, sector or country because of any specific activity and instead aims to obtain a more comprehensive position. We believe that the consideration of material ESG factors in conjunction with traditional fundamental analysis allows for a more holistic assessment of investment opportunities which lead to balanced and sustainable investment outcomes.

#### Pre-investment:

ESG plays a crucial role in our evaluation stage for potential investment opportunities. It serves as a risk assessment tool enabling a cautious approach in deploying our investors' money in the appropriate assets. The undertakes detailed team qualitative and quantitative analysis of the potential investment opportunity.

Our Investment Committee is apprised of material ESG findings where applicable.

#### **Post-investment:**

Engagement with companies on a periodic basis helps us monitor the ESG related factors of our portfolio companies. The underpinning of our engagement with companies is our belief that companies that are well governed, make transparent disclosures and manage stakeholder relationships are best suited to deliver sustainable shareholder value. By engaging proactively with companies, we aim to encourage them to adopt more sustainable practices and improve their governance, which in turn can lead to longterm benefits for both the company and its investors. Closer engagement with the relevant stakeholders ensures that we build resilience to emerging ESG issues by being able to identify early warning signals. This allows us to proactively address potential risks and capitalize on opportunities related to ESG factors. The engagement process is undertaken by our investment team with support from the fund managers. It involves a dialogue on material ESG factors, with the focus on better understanding the

position of the company on such material ESG factors and to help the company understand our concerns on the same.

In summary, our approach is intended to provide a broad framework for ESG integration through the investment lifecycle. 360 ONE Asset's ability to influence and exercise control over ESG matters with respect to companies in which we invest venture capital or private equity will vary depending on investment structure and contractual rights.

# RESPONSIBLE SELLING

## **Client Centricity**

360 ONE prioritizes client's risks, interests and upholds ethical practices in investment advisorv, transactions, monitoring, reporting. and А detailed risk profiling which includes assessment of the client's risk tolerance, investment objectives, and financial situation is conducted before recommending investment solutions. The Organisation also has а high-level Product Approval Committee which looks at and approves complex products that are proposed to be recommended and distributed to the client. All disclosures that are made in marketing materials/term sheets are also vetted by Compliance and Risk Management teams to ensure that risks are properly disclosed to clients. These measures enable 360 ONE to tailor products suitable to the client's risk profile, mitigate risks and ensure that their investment objectives are better aligned. 360 ONE's ethical conduct and adherence to best practices build trust and confidence in its relationship with clients. The Organisation's key client segments encompass professionals, medium to large industrialists, corporate treasuries, large traders, senior executives, fund endowments, family offices, and entrepreneurs. To ensure strong customer engagement, the Organisation has adopted a holistic approach that spans across the entire value chain of the business. From the initial interaction to post-sales support, 360 ONE strives to provide excellent customer service and meet their needs effectively.

360 ONE Wealth has an open architecture which means we recommend the best products in India that meet our clients' needs. This is consistently achieved through relationships trust built on generated through sound advice from experts. The holistic advice emerges from deep research and having the best talent in the industry. We offer innovative and comprehensive investment solutions that are tailored to client needs. With this unique proposition, we are truly able to align with our client's interests and be on the same side of the table.

360 ONE is ethical and transparent with all its clients and makes sure that the right information is communicated to all the customers. It has adopted a mechanism that facilitates seamless communication with clients. It has established a client services and operations team, catering to high-priority areas like Query Management, Compliance Checks, and Onboarding amongst others. These teams ensure the highest quality of customer service and delivery while enhancing the customer experience.

360 ONE, the At Asset allocation committee (AAC) plays a crucial role in wealth management by overseeing the allocation of assets within investment portfolios. AAC creates and updates the strategic investment plan based on the client's objectives, risk tolerance, and market conditions.

To ensure the utmost quality, 360 ONE has formulated a dedicated Product Approval Committee (PAC) which syncs its product views with AAC and curates the list of products identified for the clients. The PAC's diligence in evaluating and approving financial products is crucial to maintaining the integrity of 360 ONE's offerings, safeguarding clients' interests, and ensuring that the products align with the Organization's investment philosophy and objectives.

In our comprehensive approach to wealth management, our dedication to Open Architecture for Product Selection serves as the cornerstone of our 'clientcentric' ethos. By consciously steering clear of conflicts of interest, we maintain an unbiased stance when it comes to product selection & portfolio creation, ensuring no bias towards our in-house manufactured products under the 360 ONE umbrella. In line with the un-biased approach, our investment in non-360 ONE products represent more than 90% of our total Wealth AUM.

Our approach to non-conflicted and unbiased product selection involves meticulous evaluation at every step. Every filtered opportunity undergoes an extensive and detailed evaluation process, examining various facets to ensure alignment with our clients' objectives and our stringent quality standards. We employ a series of proprietary selection processes, designed to maintain the highest standards of suitability and quality.

Our commitment to offering the best, extends to curating the widest possible product universe available. However, this abundance undergoes a rigorous filtration process characterized by stringent size and quality checks i.e. No. of years of experience of fund managers, market cap, risk, size & quality of the product etc.

Further to this, we meticulously evaluate risk across various acknowledging dimensions, every investment that carries its unique set of risks. Our process involves comprehensive а analysis of market risks, credit risks, liquidity risks, and operational risks. By understanding these factors, we endeavour to create a nuanced view of potential risks associated with each investment opportunity.

We assess our clients' risk tolerance, considering their individual preferences and financial goals. This helps us tailor investment strategies that align with their comfort level regarding risk exposure. Through detailed risk profiling, we aim to strike the delicate balance between risk and potential returns, ensuring that our clients' portfolios reflect their risk preferences. For select PMS clients, this gets enshrined into Investment Policy Statement (**IPS**), outlining both do's and don'ts to take our investment decisions. IPS provide guidance on the risk assessment, periodic review of the portfolio and portfolio level cost implications to the client.

Our focus on wealth management advisory goes bevond conventional financial services. lt embodies а partnership where we prioritize our clients' best interests. By sitting on the same side of the table, we position ourselves to work collaboratively with our clients to navigate the intricacies of wealth management. This approach signifies a dedication to truly understanding our clients' aspirations, concerns, financial and objectives. Through this approach we craft tailored strategies that are solely aimed at advancing our clients' financial well-being.

Furthermore, there were no legal actions for Anti-Competitive Behaviour, Anti-Trust, And Monopoly Practices taken during the year.

## Educating Customers

Our client-centric approach extends to educating and empowering our clients through various workshops and educational initiatives such as research reports, webinars, seminars, Young Leaders Program, Founders' Day etc. for wealth management clients. We believe in responsible selling, which involves equipping our clients with knowledge and insights to make informed financial decisions.

360 ONE believes in ethical business conduct and maintains adherence to all the required laws, mandates, disclosure requirements and regulations for all the business verticals. It ensures transparency and disclosure of all the information to the customers regarding the products and services. This includes the price, risks, terms and conditions and responsibilities of the services provided are clearly communicated. Customers are informed of any interruptions or discontinuations of essential services via emails, calls and other forms of electronic communication. It also makes sure to provide the customer with information in easily understandable language such that they can make an informed decision and choice of the product.

The Organisation adheres to all the set guidelines by SEBI and ensures to disclose all the information necessary to stakeholders digitally and through the physical documents.

### Customer Satisfaction

Δt 360 ONE, customer satisfaction is a top priority and the Organisation maintains constant engagement with the clients to better understand their needs and identify any areas for improvement. To assess customer satisfaction, the Organisation regularly conducts surveys that cover various criteria such as service experience, process efficiency, time management and user experience.

The feedback gathered from these surveys plays a crucial role in guiding the efforts to enhance the services and processes. Additionally, the Organisation makes it a practice to reach out to customers through gratitude calls to gain a deeper understanding of their issues and gather valuable feedback for further improvement.

Through these continuous feedback mechanisms and customer engagement initiatives, 360 ONE strives to ensure that the clients receive the highest level of satisfaction and that their needs are met effectively.

## Customer Grievance Redressal

360 ONE upholds a strong commitment to ethical and fair business conduct. When clients raise issues or concerns, the Organisation handles them with utmost care and courtesy. To ensure effective resolution of such matters, a Grievance Redressal Policy has been implemented that provides а framework for taking appropriate actions and steps.

The policy aims to establish transparency and accessibility in addressing client grievances. It provides clear guidelines, structured approach and recommendations on how to address and resolve any issues or queries raised by the clients.

360 ONE believes in maintaining open lines of communication and ensuring that the clients' grievances are promptly and appropriately addressed. By actively engaging with the clients and following the grievance redressal policy.

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\*Please <u>click here</u> to refer Annual Report of FY 2023-24

## **ACRONYMS**

AAC	Asset Allocation Committee
AIF	Alternative Investment Funds
AMC	Asset Management Company
AML	Anti-Money Laundering
AUM	Assets Under Management
BCCMT	Business Continuity Crisis Management Team
BCP / DR	Business Continuity Planning and Disaster Recovery
BRSR	Business Responsibility and Sustainability Report
CEO	Chief Executive Officer
CRO	Chief Risk Officer
CRAB	Conflict Resolution Advisory Board
CSR	Corporate Social Responsibility
E&S	Environmental and Social
ESG	Environmental, social and corporate governance
ESRA	Environmental and Social Risk Assessment
ESOP	Employee stock Option plan
ESPS	Employee Stock Purchase Scheme
FY	Financial Year
GHG	Greenhouse gas
GJ	Gigajoules
GRI	Global Reporting Initiative
HNI	High Net-worth Individual
HR	Human Resources
ICC	Internal Complaints Committee
InvITs	Infrastructure Investment Trusts

IPO	Initial public offering
IPS	Investment Policy Statement
KYC	Know Your Customer
LED	Light Emitting Diode
MD	Managing Director
MF	Mutual Fund
MT	Metric Ton
NBFC	Non-bank financial institution
NFOs	New Fund Offers
NGO	Non-governmental organization
PAC	Product Approval Committee
FPC	Farmer Producer Companies
PMLA	Prevention of Money Laundering Act
PMS	Portfolio Management Services
POSH	Prevention of Sexual Harassment
RAG	Red-Amber-Green
RBI	Reserve Bank of India
REITs	Real Estate Investment Trusts
RM	Relationship Manager
RMC	Risk Management Committee
SEBI	Securities and Exchange Board of India
UN SDGs	United Nations Sustainable Development Goals
UHNI	Ultra High Net-worth Individual
USD	United States Dollar
PCS	Pre-Credit Score