

360 ONE WAM LIMITED**Environmental, Social and Governance (ESG) Policy**

Approving Authority	The Board of Directors of 360 ONE WAM LIMITED (“ Company ” and formerly known as IIFL Wealth Management Limited)
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1. Introduction

360 ONE WAM LIMITED ("**Company**" and formerly known as IIFL Wealth Management Limited), is one of the leading wealth and alternates-focused asset management firms in India. It has built a comprehensive wealth and asset platform over the years.

Its offerings range from wealth and asset management to lending solutions and succession planning services. It offers a comprehensive range of distinct, variable and personalised wealth and alternates-focused asset management solutions through a holistic product platform that serves the discerning needs of its clients.

The Company recognises the critical importance of creating value for all of its key stakeholders (*including customers, investors, employees, service providers / value chain partners, media, regulators and communities*). As a responsible wealth and asset management firm, the Company shall endeavour 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 shall be aimed at delivering its sustainability goals and making a meaningful contribution towards a better future.

2. Applicability of Policy

This Policy focuses on Company's approach towards environmental, social and governance (ESG) aspects and acts as a guiding framework to manage related impacts and risks, as well as enable responsible investing for continued value creation. This Policy shall apply to ESG initiatives of the Company and its subsidiary(ies), from time to time.

Further, the Company shall endeavour to engage with service providers / value chain partners in order to encourage them for undertaking ESG initiatives and / or aligning their ESG initiatives with the ESG vision and initiatives of the Company and comply with the requirement(s) of this Policy.

3. Objectives of the Policy

This Policy brings out Company's approach to ESG integration in business operations, as well as helps to establish Company's position as a climate conscious, socially responsible and well governed organization. The Objectives of the Policy are:

- Promoting Company's ESG agenda by setting up the governance structure for ESG related matters,
- Guide towards the formulation of organization's ESG roadmap, goals and targets, and
- Develop mechanism to monitor and report on ESG performance on an ongoing basis.

4. ESG Vision

The Company'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.

5. ESG frameworks

The Company shall refer to applicable and relevant national and international ESG frameworks for identification of key focus areas, material ESG topics, integration of ESG into business and operations of the Company and reporting of the Company's ESG performance including but not limited to:

- Applicable local, national and international environmental and social legislations
- United Nations Principles for Responsible Investment (UN PRI)
- United Nations Sustainable Development Goals (UN SDG)
- Task Force on Climate-related Financial Disclosure (TCFD)
- Requirements of Dow Jones Sustainability Index (DJSI)
- Business Responsibility and Sustainability Report (BRSR)
- International Finance Coalition (IFC) Performance Standards
- Global Reporting Initiative (GRI)
- National Guidelines on Responsible Business Conduct (NGRBC)
- Sustainability Accounting Standards Board (SASB)

The management shall be free to elect and apply all or any of the ESG frameworks as it may consider appropriate from time to time.

Additionally, the Company shall ensure compliance with applicable provisions of the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, any circulars issued thereunder and any other applicable laws from time to time, which require any ESG initiatives and / or disclosures and reporting by the Company.

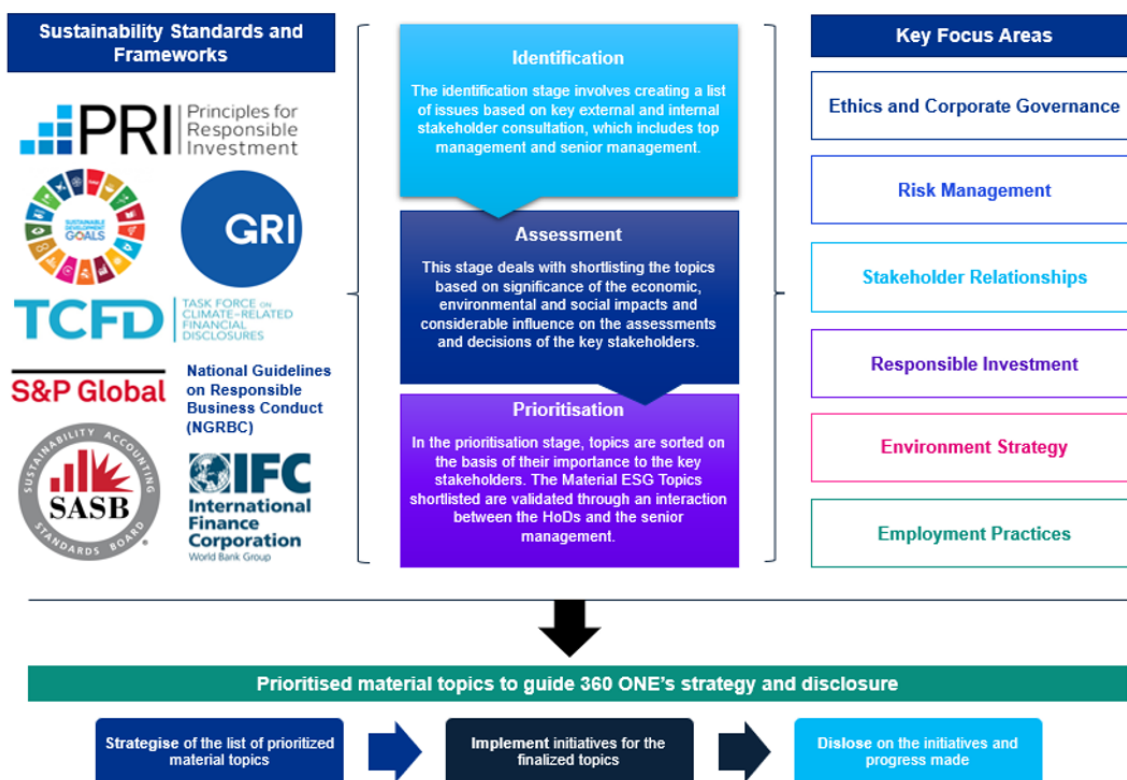
6. Company's approach to ESG

Company's ESG approach is in line with the ESG Vision of the Company. It reflects Company's efforts towards building a resilient business with integrity, ethics and consciousness towards the planet and people at its core. It has elements covering sector-specific areas and topics identified using various sustainability standards and frameworks.

The Company is conscious towards the planet and people i.e. its stakeholders, in addition to the financial profits and to measure its social and environmental impact, in addition to financial performance.

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The Company seeks to align its strategic business objectives with the ESG principles as detailed below.



The key focus areas form the basis for identifying the relevant topics (“**Material ESG Topics**”) impacting the Company’s business and operations. Material ESG Topics shall be assessed on the significance of their impact on its key stakeholders and operations and in consideration of applicable frameworks. Materiality Assessment i.e. the identification of present and / or emerging Material ESG topics and risks, shall be carried out on mid to long term basis (i.e. for 3-5 years), through a proactive engagement with key stakeholders.

The Key Performance Indicators (“**KPIs**”) and Goals thereof, along with a detailed ESG roadmap shall be formulated based on the Material ESG Topics.

7. Material ESG Topics and ESG Roadmap

The Company initiated its first materiality assessment in FY 2021-22 with a view to gain insight on each of the key focus areas impacting value creation. A detailed materiality assessment exercise was conducted to identify and prioritize the topics that are material to the Company and its key internal and external stakeholders. Material ESG Topics were then reviewed and approved by the management. The list of Material ESG Topics identified as on the date of effectiveness of this Policy is specified in **Annexure I** hereto.

The performance of the Company with respect to each of the Material ESG Topic shall be measured in terms of the KPIs. One or more KPIs for each of the Material ESG Topic shall be determined in consultation with the Heads of the Departments (“**HoDs**”) responsible for the achievement of the concerned KPI and Material ESG Topics. The HoDs shall set Goal(s) over mid to long term for each of the KPIs in consultation with the management. The Goals so set, the initiatives to achieve said Goals and the measurement of the KPIs shall be presented to the CSR and ESG Committee for its review and monitoring on a periodic basis. The CSR and ESG Committee may suggest improvements, enhancements or changes to the Goals so set or the initiatives to achieve said Goals for better performance.

All the Goals set for each of the KPIs under respective Material ESG Topics determined over mid to long term shall construct the roadmap of the Company for achieving its ESG vision (“**ESG Roadmap**”). The Board shall review the progress of the Company vis-à-vis the ESG Roadmap on a periodic basis.

8. Key Focus Areas

The Company shall focus on the following identified areas on an on-going basis which shall form its ESG strategy and disclosures.

8.1 Ethics and Corporate Governance

- 8.1.1 Inculcate and nurture a culture of transparency and accountability throughout the Company,
- 8.1.2 Comply with all applicable laws, standards and regulations,
- 8.1.3 Promote ethically sound business practices and effective monitoring mechanisms,
- 8.1.4 Focus on board diversity in all its facets,
- 8.1.5 Establish responsibility and accountability around Company’s ESG performance.

8.2 Risk Management

- 8.2.1 Company shall work towards integrating ESG risks in the existing Enterprise Risk Management (ERM) and shall promote and enhance effective risk culture throughout the organization,
- 8.2.2 The Company shall identify ESG risks and develop a mitigation strategy relevant to the business.

8.3 Stakeholder Relationships

- 8.3.1 Carry out stakeholder identification, analysis and engagement process and foster impactful relationships with the stakeholders,
- 8.3.2 Provide a safe working environment and fair treatment for all employees,
- 8.3.3 Safeguard the information of the customer by ensuring strong systems, policies and procedures around data privacy and protection,

- 8.3.4 Create sustainable returns for its customers and shareholders,
- 8.3.5 Ensure the adoption of responsible practices while onboarding the suppliers,
- 8.3.6 Empower communities by investing in identified focus areas such as financial inclusion, community development, education & entrepreneurship, financial literacy, healthcare and sanitation, relief & rehabilitation, sports & environment etc.
- 8.3.7 Encourage appropriate feedback mechanisms for all key stakeholders and incorporate the relevant suggestions,
- 8.3.8 Build a secure brand image and reputation.

8.4 **Responsible Investment**

- 8.4.1 Aspire to integrate ESG principles in wealth and asset management operations, investment decisions, product development, policies and practices material and relevant to the business,
- 8.4.2 Company shall establish a mechanism to assess the impact of its investments and endeavour to extend adoption of ESG principles to the portfolio companies in which the Company and / or its subsidiaries will invest.

8.5 **Environment Strategy**

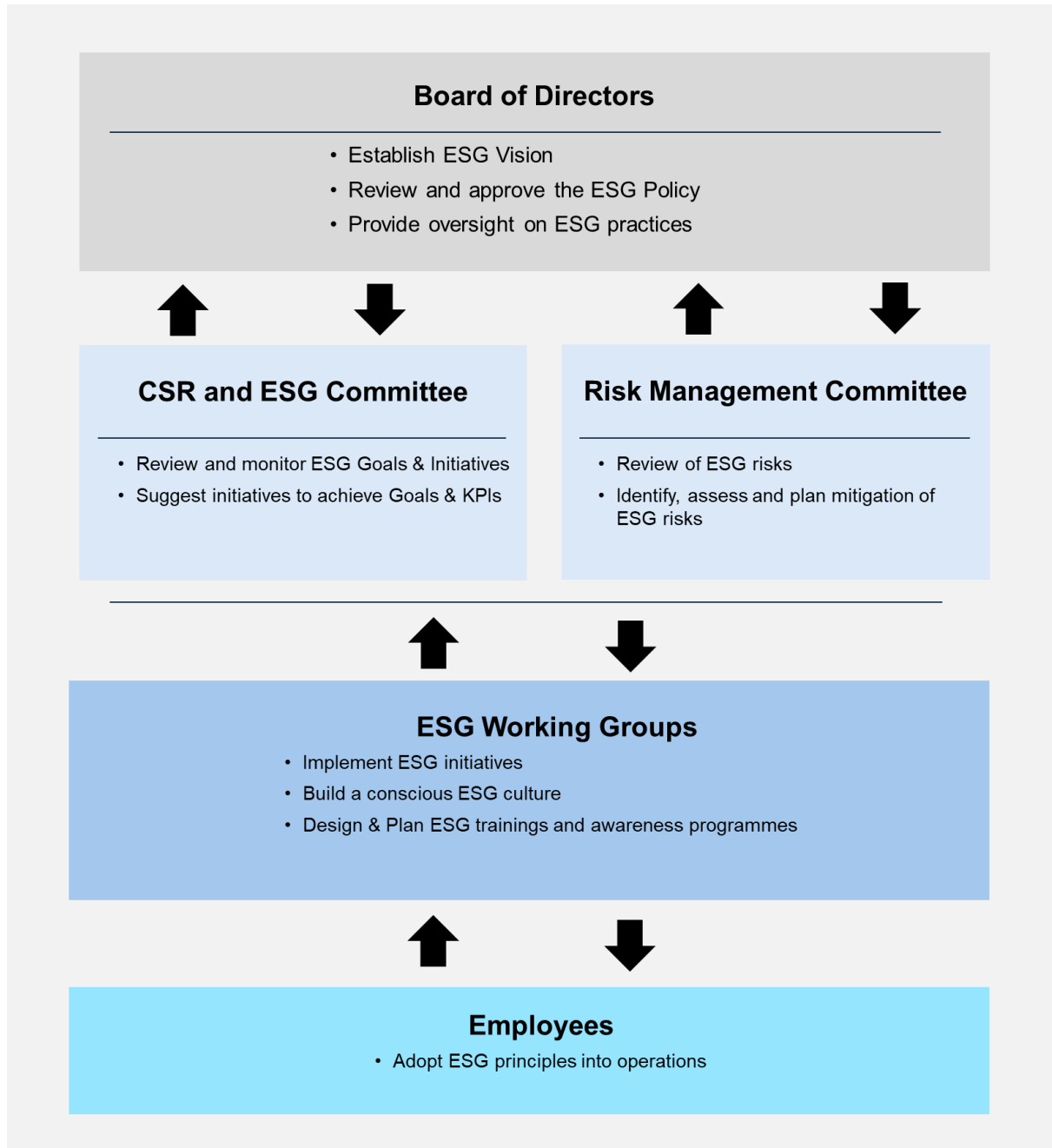
- 8.5.1 Measure, manage, monitor, and control energy consumption, emissions, waste generated, and water consumed across its offices through environmental friendly initiatives,
- 8.5.2 Create targets, guidelines and control mechanisms to reduce environmental footprint and sensitize the employees and other relevant stakeholders on environmental topics.

8.6 **Employment Practices**

- 8.6.1 Develop and maintain a safe, healthy and conducive work environment that promotes diversity, eliminates bias, and encourages equitable career development for all employees,
- 8.6.2 Ensure there is no unfair discrimination on any grounds,
- 8.6.3 Foster diversity, inclusion and equality in the Company and encourage equal opportunities among its employees,
- 8.6.4 Create a culture of continuous learning and development in the organization,
- 8.6.5 Provide trainings and awareness sessions to employees on emergency preparedness,
- 8.6.6 Nurture potential leaders through appropriate talent management and professional development tools,
- 8.6.7 Encourage initiatives for health and safety of employees and continue to reduce work related health and safety issues at all offices and locations,
- 8.6.8 Enhance the employee engagement measures and set up a feedback and grievance forum for employees,
- 8.6.9 Foster a culture of open communication and feedback on all workplace issues.

9. Governance structure

The Governance Structure for the ESG matters shall include:



Board of Directors:

The Board of Directors have an overarching responsibility of setting the course for ESG journey of the Company and driving the ESG agenda ahead. The Board shall provide effective oversight and strategic leadership for prudent ESG performance. The Board shall be responsible for:

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1. laying down the ESG Vision,
2. approving and reviewing the ESG Policy from time to time,
3. to provide strategic inputs on improvements to the ESG Vision, ESG Policy and ESG Roadmap from time to time, and
4. approve the annual Sustainability / ESG Report and the Business Responsibility and Sustainability Report of the Company.

Additionally, the Board shall endeavour to integrate the principles of ESG into other policies of the Company.

CSR and ESG Committee:

The CSR and ESG Committee reports to the Board and is responsible for review and monitoring of the Goal(s) set by the HoDs, the initiatives to achieve said Goals and the measurement of the KPIs as presented to the CSR and ESG Committee on a periodic basis. The CSR and ESG Committee may suggest improvements, enhancements or changes in the Goals so set or the initiatives to achieve said Goals for better performance.

Risk Management Committee:

The Risk Management Committee reports to the Board and is responsible for overall monitoring of the risk management at the Company. The Risk Management Committee shall look at key risk issues (including the ESG related risks) and mitigating actions, and adequacy of risk management system.

ESG Working Groups

The management shall oversee effective implementation of ESG initiatives and encourage forming of ESG Working Groups of the concerned HoDs and business heads for ease of inter-departmental co-ordination. The Company Secretary of the Company shall act as convener of the ESG Working Groups meetings and shall provide secretarial assistance in a manner similar to the Board and Committees.

The members of the ESG Working Groups shall lead the process of building a conscious ESG culture by encouraging the employees and relevant stakeholders to contribute to the Company's ESG Vision.

Additionally, the ESG Working Groups shall design and conduct periodic programs for capacity building sessions to create awareness for ESG in general and especially for Company's ESG Vision and sensitize the employees on ESG initiatives, issues, risks and opportunities.

Employees

Every employee of the Company shall endeavour to inculcate ESG principles in their

operations and shall support the Company in achieving its ESG Vision through active participation in the implementation of the ESG initiatives.

10. Linkage to Company's other policies

List of other policies put in place by the Company and available on the website of the Company:

1. Board Diversity Policy
2. Code of Conduct for Board & Senior Management
3. Corporate Social Responsibility Policy for 360 ONE WAM LIMITED and its subsidiaries
4. Policy on Vigil Mechanism and Whistle Blower Mechanism
5. Policy for determination of Materiality of Information or events
6. Policy for determining material subsidiary
7. Policy on preservation of documents / archival policy
8. Terms and conditions of appointment of Independent Directors
9. Dividend Distribution Policy
10. Code of Practices and Procedures for fair disclosure of unpublished price sensitive information (UPSI)
11. Nomination and Remuneration Policy
12. Risk Management Policy (Abridged Summary)
13. Familiarization Programme for Independent Directors
14. Tax Policy and Governance
15. Policy on Related Party Transactions
16. Information and Cyber Security Policy
17. Information Technology Policy
18. Anti-Corruption Policy
19. Equal Opportunity and Commitment to Diversity Policy
20. Gift Policy
21. Prevention of Sexual Harassment and Complaint Procedure
22. Investor Grievance Redressal Framework
23. Conflict of Interest Policy

11. Amendments to the Policy

The Board of Directors of the Company has the right to amend or modify this Policy save and except the Annexure 1, which can be amended or modified with the approval of Chief Operating Officer and the Company Secretary basis the aforesaid Materiality Assessment.

All questions of interpretation of the Policy shall be determined by the CSR and ESG Committee and such determination shall be final and binding upon all concerned persons.

Annexure I: Material ESG Topics

Environment	Social	Governance
Carbon footprint	Customer relationship management	Brand reputation, Ethics, Transparency and Trust
Climate change strategy	Human rights, diversity & inclusion and equal opportunity	Legal & regulatory compliance and Corporate Governance
Responsible Investment and Product Innovation	Health and Safety	Enterprise Risk Management
	Talent Management, Employee Engagement, Work Culture	Data Privacy and Security
	Community development	