

GOLDMAN SACHS (INDIA) CAPITAL MARKETS PRIVATE LIMITED CORPORATE SOCIAL RESPONSIBILITY POLICY

Applicability: ALL GOLDMAN SACHS (INDIA) CAPITAL MARKETS PRIVATE LIMITED

The Goldman Sachs Group, Inc. is a leading global investment banking, securities and investment management firm that provides a wide range of financial services to a substantial and diversified client base that includes corporations, financial institutions, governments and individuals. Founded in 1869, the firm is headquartered in New York and maintains offices in all major financial centers around the world.

Goldman Sachs (India) Capital Markets Private Limited (hereinafter referred to as “**the Company**”), a company incorporated in Mumbai, India, is engaged in Primary Dealership activities.

A. OBJECTIVE & SCOPE

This is the Corporate Social Responsibility Policy (“**CSR Policy**”) for the Company as required under the Companies Act, 2013 (hereafter referred to as “**the Act**”), read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 and other directions and clarifications issued by the Ministry of Corporate Affairs from time to time (collectively referred to as the “**CSR Regulations**”). This policy lays down broad approach and direction for selection, implementation and monitoring of CSR activities as well as formulation of the annual action plan pursuant to CSR Regulations in the sphere of corporate social responsibility undertaken by the Company.

The Board of Directors of the Company (“**Board**”) shall be responsible for implementing this Policy and shall ensure that the CSR activities are carried out in accordance with this Policy read with CSR Regulations.

B. CSR COMMITTEE OF THE COMPANY

- **Constitution**

The Board shall constitute the Corporate Social Responsibility (“**CSR**”) committee as a sub-committee of the Board, as required and in compliance with CSR Regulations.

- **Role, Objective and Powers of the Committee**

The CSR committee shall assist the Board in implementing the CSR Regulations and the CSR Policy, and shall also:

- Formulate and recommend to the Board an annual action plan (“**Action Plan**”) in pursuance of the CSR policy, which shall include provisions specified in the applicable CSR Regulations and recommend to the Board any alterations that

may be required to such plan during a financial year in accordance with applicable CSR Regulations

- Formulate and revise the CSR Policy and recommend the same to the Board for approval and adoption
- Recommend CSR activities to the Board as stated under Schedule VII of the Act
- Recommend the CSR budget to the Board
- Create a transparent monitoring mechanism for implementation of CSR initiatives in India

- **CSR Committee Charter**

The terms of reference of the CSR committee including frequency of the committee meeting, quorum, agenda, minutes of the meeting, powers of the Committee, etc. have been stipulated in the CSR committee charter, which was approved by the Board in their meeting held on January 14, 2015 and as amended from time to time.

C. CSR ACTIVITIES

The CSR committee shall recommend to the Board for its approval the Action Plan and CSR activities in pursuance of the CSR Regulations and this CSR policy. Such CSR activities may be undertaken in collaboration with other companies or through implementing agencies as may be recommended by the CSR committee and approved by the Board from time to time. The CSR committee is authorized to approve any modification to the existing Action Plan and or CSR activities or to propose any new activity subject to the approval of the Board.

D. Guiding Principles for Selection, Implementation of CSR activities and Monitoring mechanism

- **Selection**

CSR activities to be identified and planned for approval by the CSR committee and Board with respect to the following focus areas:

- Gender Equality and Empowerment of Women: promoting gender equality and women's economic empowerment, entrepreneurship and access to capital
- Promotion of education and social innovation: promoting education and skill enhancement especially among girl children
- Health: promoting health care including preventive health care and mental health care
- Environmental Sustainability and betterment
- Disaster Relief and Rehabilitation: managing and responding to disasters
- Improvements to immediate local communities or such other causes / initiatives as approved by the CSR Committee and Board pursuant to Schedule VII of the Companies Act, 2013

Company shall ensure that in identifying its CSR activities, preference shall be given to the local area and areas around which the Company operates. However, the Company may pursue CSR activities in other areas as well.

The internal team responsible for CSR will identify and select CSR projects in line with the Action Plan and present it to the CSR committee for its review. The committee will review, approve and recommend the projects classified either as ongoing or otherwise to the Company's Board for its approval.

- **Implementation**

Once approved by the Board, the Company will implement its CSR activities through implementing agencies and enter into grant agreements detailing the objectives and scope of the project, grant disbursement summary, utilization, duration, reporting and monitoring framework.

- **Monitoring Mechanism**

To ensure compliance with CSR Regulations, the CSR Policy and the Action Plan, the CSR committee will monitor the projects undertaken by implementing agencies, including assessment of the projects for the intended purpose and update the Board regarding such monitoring:

- Reporting – The Company will ensure it receives from the implementing agencies periodic progress reports during the course of the project and a final report on completion of the project, along with appropriate documents/records/certificates detailing the grant utilization towards the project.
- Monitoring and Evaluation - The project reports and utilization reports as received from the implementing agencies will be evaluated by the relevant internal teams and reported to the CSR committee. The CSR committee basis aforesaid reports will recommend any action/course correction, if any to be taken/made by the implementation agencies.

E. POLICY REVIEW & FUTURE AMENDMENT

The Board may subject to compliance with applicable law, at any time, review, amend or modify the CSR Policy as it deems fit to comply with the statutory obligation of the Company to undertake CSR activities.

REVISION HISTORY

- March 6, 2023 (current; revised to incorporate minor and clarificatory language changes)
- December 14, 2022 (current; revised to incorporate certain changes with respect to guiding principles for selection, implementation of CSR activities and monitoring mechanism)
- March 23, 2021 (current; revised to align the Policy with Rules of the Companies (Corporate Social Responsibility Policy) Rules, 2014 and other changes).
- March 29, 2019 (current; revised to align the Policy with Rule 5 of the Companies (Corporate Social Responsibility Policy) Rules, 2014 and other changes)
- January 16, 2015 (original)