POLICY ON THE DISCHARGE OF STEWARDSHIP RESPONSIBILITIES (IMPLEMENTATION VERSION)

Finideas Growth Fund – Scheme 1
(Category III AIF registered with Securities and Exchange Board of India)

Version 2.0
Effective Date: 08 June 2026
Approved by: Board of the Investment Manager
Last Reviewed: 08 June 2026

1. OBJECTIVE AND REGULATORY FRAMEWORK

Finideas Growth Fund – Scheme 1 ("the Fund") has adopted and actively implements this Stewardship Policy in alignment with the SEBI Stewardship Code applicable to Alternative Investment Funds and the SEBI (AIF) Regulations, 2012.

Finideas discharges its stewardship responsibilities as part of its fiduciary duty toward investors. The Fund ensures that all stewardship activities are carried out in a structured, documented, and compliant manner, promoting responsible ownership and long-term value creation.

2. STEWARDSHIP PHILOSOPHY

Finideas believes that active and responsible ownership strengthens corporate governance standards and enhances long-term financial performance. Stewardship is embedded into the Fund's investment decision-making and monitoring process.

The Fund integrates governance standards, financial discipline, risk management practices, and material ESG considerations into its monitoring and engagement framework to protect investor interests.

3. APPLICABILITY AND RESPONSIBILITY

This Policy applies to all equity and equity-related investments where Finideas holds voting rights or governance influence.

The Investment Team actively monitors investee companies. The Compliance Officer oversees regulatory adherence. Senior management reviews material stewardship matters. Stewardship implementation is therefore operationally embedded within Finideas' governance framework.

4. IDENTIFICATION AND MONITORING OF INVESTEE COMPANIES

Finideas continuously monitors investee companies through:

- Review of quarterly and annual financial statements
- Analysis of regulatory filings and stock exchange disclosures
- Monitoring of board composition and governance practices
- Tracking material corporate developments and risk indicators

Monitoring observations are internally documented and reviewed periodically. Any material concern is escalated to senior management for further action.

5. ENGAGEMENT STRATEGY

Finideas engages constructively with investee companies where governance, performance, or risk concerns are identified. Engagement is carried out through formal communications, management meetings, or participation in shareholder interactions.

The Fund follows a proportionate approach based on investment size and issue materiality. Engagement discussions and outcomes are documented for record and compliance purposes.

6. KEY AREAS OF FOCUS

In practice, Finideas focuses stewardship efforts on:

- Board effectiveness and independence
- Executive remuneration alignment
- Capital allocation discipline
- Risk management frameworks
- Financial transparency and disclosure standards

Where relevant, environmental, social, and governance (ESG) factors are evaluated as part of the investment and monitoring process.

7. VOTING POLICY AND PROXY DECISIONS

Finideas actively exercises its voting rights in investee companies after conducting independent analysis of proposed resolutions.

Voting decisions are based on long-term value considerations and governance standards. The Fund maintains detailed records of voting instructions and rationale.

Where a conflict of interest arises, Finideas identifies, documents, and manages the conflict in accordance with its Conflict of Interest Policy to ensure unbiased decision-making.

8. ESCALATION MECHANISM

Where initial engagement does not adequately address material concerns, Finideas may escalate its stewardship actions. Escalation may include:

- Voting against management proposals
- Seeking additional disclosures
- Engaging with independent directors
- Collaborating with other institutional investors

Escalation steps are proportionate, documented, and aligned with fiduciary obligations.

9. COLLABORATION WITH OTHER INVESTORS

Finideas may collaborate with other institutional investors to enhance engagement effectiveness where appropriate.

Such collaboration is conducted in compliance with regulatory requirements and applicable competition laws, ensuring that collective actions remain consistent with investor interests.

10. CONFLICT OF INTEREST MANAGEMENT

Finideas actively identifies and manages potential conflicts of interest in stewardship activities.

Where the Sponsor, Investment Manager, or affiliates have relationships with investee companies, the matter is reviewed independently and appropriate safeguards are implemented to ensure objective voting and engagement decisions.

All conflict assessments are documented.

11. REPORTING AND DISCLOSURE

Finideas provides periodic disclosure to investors regarding stewardship activities, including summary of voting actions and significant engagement matters, in line with SEBI Stewardship Code requirements.

Material stewardship matters are reflected in investor communications where required.

12. RECORD KEEPING

Finideas maintains comprehensive documentation of:

- Monitoring activities
- Engagement correspondence
- Voting records and rationale
- Escalation decisions

All records are preserved for a minimum of eight years or as prescribed under applicable regulations.

13. GOVERNANCE AND BOARD OVERSIGHT

The Board of the Investment Manager reviews stewardship implementation periodically.

Reports on engagement activities, voting summaries, and material governance issues are placed before the Board to ensure oversight and accountability.

The Compliance Officer ensures ongoing alignment with regulatory developments.

14. TRAINING AND CAPACITY BUILDING

Finideas conducts periodic internal discussions and updates for investment and compliance personnel on stewardship obligations, governance standards, and regulatory changes.

This ensures informed and responsible execution of stewardship responsibilities.

15. REVIEW AND AMENDMENT

Finideas reviews this Policy annually or earlier if required due to regulatory amendments or strategic changes. Amendments are approved by the Board of the Investment Manager and implemented accordingly.

CONCLUSION

Finideas Growth Fund – Scheme 1 actively discharges its stewardship responsibilities through continuous monitoring, structured engagement, informed voting, conflict management, and transparent reporting.

The Fund implements this Policy in both letter and spirit, reinforcing its commitment to investor protection, responsible ownership, and full regulatory compliance.

Darji YogeshKUMAR Balvantbhai

Digitally signed by Darji YogeshKUMAR Balvantbhai
Date: 2026.06.06 14:44:47 +05'30'