

CORPORATE GOVERNANCE POLICY

The following Corporate Governance Policy Statement is prepared by UpperCrust Wealth Pvt. Ltd. and effected from **15th September 2021**.

UpperCrust Wealth Pvt. Ltd. complies with applicable laws, rules, and regulations while conducting its businesses. It follows the highest degree of ethical code of conduct and applies best corporate governance practices. We believe that best Corporate Governance practices when implemented successfully increase shareholders' value.

Our Board members are mandated to craft the policies, procedures, and implementations of the corporate governance practices at our company. The entire organization functions under the direction of the Board of Directors and follows the policies designed by them.

Board of Directors' Roles & Responsibilities

The main purpose of the Board of Directors is to ensure the company's success which is driven by the company's affairs by meeting the interests of its shareholders. The Board is poised to hold a holistic approach when it comes to designing governance policies.

Primarily the Board is responsible for but not limited to –

- Establishing vision, mission, and values of the company
- Drafting policies and procedures and revise them periodically
- Crafting company's strategy and designing it and execute it
- Delegating management to authority and allocating responsibility to the respective person
- Monitoring company's performance periodically and identifying variances
- Applying Risk management practices thereby protecting stakeholders' interest
- Nominating various committees like Credit Committee, CSR Committee, Remuneration Committee, Audit Committee

Besides the aforesaid items, the Board is responsible to identify the funding requirements and monitor as to how the capital is spent on whatever means. The company is responsible enough to articulate the direction of the company and see how the available resources are utilized optimally.

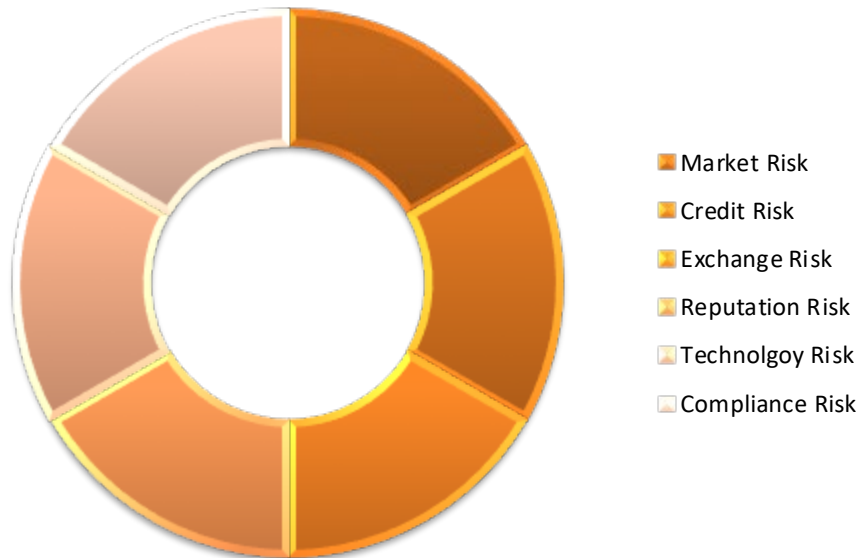
As a part of incorporating best corporate governance practices, the company follows all guidelines crafted by regulatory authority be it SEBI, RBI among other authority in place. The company holds fairness practice code by reviewing and monitoring all its activities and get them published on the website and relevant reports periodically.

The Board is entitled to act as -

- Credit Committee to identify how the resources are managed
- Fraud Committee to identify and resolve fraud
- CSR Committee to focus more on ESG compliance
- Audit Committee to select and appoint internal as well as external auditor.

- Investment Committee (comprises the Board of Directors and senior analyst team) to analyze various asset classes, undertake valuations, etc.

The following framework states a variety of risks (emanating from either micro or macro environment) that the organization may face anytime -



The nature of the business that we are into may attract the aforesaid risks, and so we utilize the best in class of risk management practices that help mitigate risk emanating from transactions. We hold top down approach in order to execute our risk management practices thereby protecting investors' assets.

Risk Management Practices

We apply risk management practices as part of our corporate governance policy. We believe that risk is associated with business activity and we incorporate the risk management tool while designing and executing strategy framework. We deal with highly sophisticated tools, methodology with a comprehensive framework that helps mitigate risk be it – Credit risk, Technology risk, Compliance risk, Exchange risk among others. We develop standard procedures and implement them to ensure their success. It is not confined up to designing risk management framework, however, we periodically evaluate the performance of tools we have applied and revise them if and when required.

Internal Controls

We incorporate internal controls to streamline current business activities thereby warding off complex situations. We apply the best internal controls system associated with financial, operational, and compliance perspectives.

Financial Reporting Quality

We at UpperCrust firmly believe in creating and producing financial reports compliant with relevant laws and regulations. Our internal audit team periodically audit and review our financial reporting quality framework that constantly meet regulatory standards. The methodology, guiding principles, recognition criteria are published in our financial reports thereby offering best practices of financial reporting quality.

Audit and Disclosure

All of our policy frameworks are pre-audited before their commencement. We get our committee engaged during the ongoing process of implementation of the corporate governance policy framework.

We disclose the methodology and pedagogy that we apply to design the best practice analysis in our reports, websites periodically.

For any queries related to the aforesaid policy statement, please feel free to contact **Shaily Pandya** at **mail@uppercrustwealth.com**