

Stewardship Code

Sr. No.	Principles of Stewardship Code	Discharge of Stewardship Responsibilities
1.	Principle 1: Institutional Investors should formulate a comprehensive policy on the discharge of their stewardship responsibilities, publicly disclose it, review and update it periodically.	CSIM India AIF has formulated Stewardship Code (the Code) in accordance with the provision of the SEBI Circular No. CIR/CFD/CMDI/168/2019 dated December 24, 2019 (the SEBI Circular). The Code has been approved by the Board of Directors of C & S Investment Managers Private Limited (the Investment Manager). Stewardship responsibilities include monitoring and actively engaging with investee companies on various matters including performance (operational, financial, etc.), strategy, corporate governance (including board structure, remuneration, etc.), material environmental, social, and governance (ESG) opportunities or risks, capital structure, etc. Such engagement may be through detailed discussions with management, interaction with investee company boards, voting in board or shareholders meetings, etc.
2.	Principle 2: Institutional investors should have a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it.	CSIM India AIF has formulated a detailed policy for identifying and managing conflicts of interest. The policy is intended to ensure that the interest of the Investor is placed before the interest of the entity. The policy is also address how matters are handled when the interests of clients or beneficiaries diverge from each other.
3.	Principle 3: Institutional investors should monitor their investee companies	CSIM India AIF monitors the investee companies through various activities like financial performance analysis, management evaluation, business outlook, corporate governance, capital structure, industry level changes, and other key risk areas. Monitoring of areas like remuneration, risk related to social and environmental issues, shareholder rights and grievances was done on a best effort basis.
4.	Principle 4: Institutional investors should have a clear policy on intervention in their investee companies. Institutional investors should also have a clear policy for collaboration with other institutional investors where required, to preserve the interests of the ultimate investors, which should be	CSIM India AIF for any investments which are significantly above the threshold, may intervene, if in its opinion, any act/ omission of the investee company is considered material on a case to case basis, including but not limited to insufficient disclosure, inequitable treatment of shareholders, non-compliance with regulations, performance parameters, governance issues, related party transactions, corporate plans / strategy or any other related matters. The aspects of the intervention will be determined on a case-to-case basis.

	disclosed	
5.	Principle 5: Institutional investors should have a clear policy on voting and disclosure of voting activity	The Investment Manager has formulated the Voting Policy approved by the Board of Directors. The said Policy lays down the rules related to voting on the issues related to the investee companies. The Policy has been disclosed on the website.
6.	Principle 6: Institutional investors should report periodically on their stewardship activities	CSIM India AIF shall report its stewardship activities as per the guidelines issued by SEBI.