

PINKCITY JEWELHOUSE PVT LTD

Corporate Social Responsibility Policy

(Effective from 18th December, 2014)

1. INTRODUCTION:

Pinkcity Jewelhouse Private Limited (hereinafter referred to as “Pinkcity”) has adopted **Corporate Social Responsibility (CSR)** initiatives with its overall commitment to maintaining the highest standards of business performance. We recognize that our business activities have direct and indirect impact on the society. Pinkcity works towards improving education including both Primary as well as secondary education. The Company’s focus has always been to contribute to the sustainable development of the society and environment, and to make our planet a better place for future generations.

2. REGULATORY REFERENCE:

- 1) Section 135 under the Companies Act, 2013;
- 2) Companies (Corporate Social Responsibility Policy) Rules, 2014;
- 3) Schedules VII

3. Policy:

This policy shall be known as Corporate Social Responsibility Policy of the Company which is referred in this Policy as “the Policy” or “CSR Policy”.

4. OBJECTIVE:

Pinkcity CSR policy intends to:

- a) Create economic value and to actively contribute toward the development of a sustainable society by taking up projects for the common good through responsible business practices and good governance.
- b) Embrace responsibility for the Company’s actions and encourages a positive impact through its activities on environment, communities, stakeholders and the society.

5. CSR COMMITTEE:

As per requirement of Section 135 of Companies Act, 2013 and rules related thereto, the Board of Directors of the company has constituted the “Corporate Social Responsibility Committee” comprising of following Directors:

1. Mr. Manuj Goyal; Director, as Chairman of the Committee
2. Mrs. Kajal Goyal, Director, as Member of the Committee

6. FOCUS AREAS:

- 1) In accordance with the requirements under the Companies Act, 2013, Pinkcity CSR activities will focus on:
 - a) **EDUCATION & EMPLOYMENT:** Adopting Institutions, promoting education, and employment-enhancing vocational skills especially among children, and livelihood enhancement

projects; monetary contributions to academic institutions for establishment infrastructure with the objective of assisting students in their studies

b) RURAL DEVELOPMENT: Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.

c) HUNGER, POVERTY, MALNUTRITION AND HEALTH: Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.

2. The CSR Activities shall not include the following:

- a) Activities undertaken in pursuance of normal course of business of the Company;
- b) Activities that benefit only the employees of the company and their families;
- c) Contribution to any political party.

7. CSR EXPENDITURE:

a) In the beginning of every financial year, the CSR Committee shall determine whether the provisions of Section 135 of the Act for mandatory CSR spend are applicable to the Company and accordingly, determine the CSR Expenditure Budgeted for the financial year and recommend the same for Board approval.

b) CSR Expenditure Budgeted shall include all expenditure including contribution to corpus or on projects / programmes relating to the CSR Activities. For achieving the CSR objectives through implementation of meaningful and sustainable CSR programmes, the Company shall allocate the following as its annual CSR Expenditure Budgeted.

- (I) 2% of its average net profits made during the three immediately preceding financial years, as prescribed under the Act and the CSR Rules from time to time;
- (II) Any income arising there from;
- (III) Surplus arising out of CSR Activities; and
- (IV) Such other amount, as may be determined by the Company from time to time.

C) Any surplus arising out of CSR Activities shall not form part of the business profits of the Company and the same shall be spent on CSR activities.

8. MODE OF IMPLEMENTATION OF CSR ACTIVITIES:

The CSR activities would be implemented on a project mode with objectively verifiable indicators and continuous engagements with defined monitoring and reporting mechanism. The CSR activities shall be executed through any one of the following modes:

- a) Directly by the Company as referred in Rule 4(1) of the Companies CSR Rules, 2014; or
- b) Through Section 8 Company set up by a holding company or subsidiary of the Company, or by an associate company; or
- c) 3. Through a registered trust or society; or

- d) Contribution to corpus of a trust / society / company with charitable objects created exclusively for a purpose directly relatable to a subject covered in schedule VII of the Act; or
- e) Through an other NGO, Civil Society Organization, Voluntary agencies, missions, professional consultancy organizations, trusts etc. provided it qualifies and meets the track record and other criteria as per Rule 4(2) of Companies (CSR Policy) Rules, 2014.

9. LOCATION OF CSR ACTIVITIES

THE CSR Committee will decide on the locations for CSR Activities.

10. MONITORING AND REPORTING:

- a) The CSR Committee shall monitor all CSR Activities, including utilization of funds to ensure their effective implementation in accordance with the CSR Rules read with section 135 of the Act.
- b) The progress of CSR programmes under implementation will be reported to the CSR Committee at half yearly intervals.
- c) The minutes of the meetings of the CSR Committee shall be placed before the Board.
- d) The CSR Committee may be directed by the Board to present the cost incurred on CSR Activities annually and also the impact assessment thereof

11. REVIEW AND AMENDMENT

The Board may amend, abrogate, modify or revise any or all clauses of this Policy, on recommendation of the CSR Committee and in accordance with the guidelines issued by the Govt. from time to time in respect to the Act and the CSR Rules.

12. EFFECTIVE DATE:

This policy is effective from December, 18th 2014.

