



## 1. Introduction

Corporate Social Responsibility (CSR) is the way and mean through which corporates can repay the obligations made by the Society by contributing the resources in its various forms as required for the efficient operation of the Business. Corporate Social Responsibility is strongly connected with the principles of sustainability. Organization should make decisions based not only on financial or operational factors, but also on the social and environmental consequences. Therefore, it is the core corporate responsibility of PinCap to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

## 2. Objective and Purpose

The key purpose of this Policy is to:

- Outline the development areas in which the Company shall get involved in.
- Define governance structure for CSR management within the Company.
- Serve as a guiding document aiding in identification, execution and monitoring the CSR projects.
- Describe the treatment of surpluses from CSR activities.
- Define the approach and direction given by the Board of the Company,
- Provide guiding principles for selection, implementation and monitoring of activities.
- Formulate an Annual Action Plan every year as per applicable rules.

## 3. Alignment with PinCap Values

We believe to drive our CSR policy with the same values which directs PinCap. Hence, this CSR Policy absorbs PinCap's core values and is aligned in the following manner to its CSR strategy:

- Being Accountable for what we do: PinCap considers itself accountable for contributing back in a meaningful way to the society/ Nation.
- Embrace Diversity: PinCap believes in embracing diverse views and opinions which lead to a better solution. Accordingly, for execution of its CSR objectives PinCap plans to partner, where necessary, with NGOs/ other charitable organizations to meet the CSR objectives.
- Collaborate to Win: Collaborating with other NGOs/ charitable organizations, with footprint/ expertise in areas selected, is a key aspect of PinCap's strategy to make a positive impact in its CSR activities.

*Pinnacle Capital Solutions Private Limited*

Registered Office – C 43, Block, Pardeshi Para, Sonari East Singhum,, Jamshedpur, Jharkhand – 831011.

Branch Office – 2<sup>nd</sup> Floor, Plot No. 100, Sector-43, DLF Phase 5, Gurugram, Haryana– 122009

CIN No. U65990JH1995PTC006350 | support@pinicap.in | 8130195773

#### **4. Applicability**

CSR Provision become applicable to Pinnacle Capital Solutions Private Limited (referred to as “PinCap”) from FY 2023-24 Onwards which mandated the CSR expenditure obligations as per Section 135 of the Companies Act, 2013 (‘the Act’) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

#### **5. Scope of CSR Policy**

This Policy applies to all CSR projects that will be undertaken by PinCap and shall fulfil all the requirements of Section 135 of the Companies Act, 2013 and rules made thereunder. PinCap shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act, 2013. This Policy will be periodically reviewed and updated in line with the relevant codes of legislation and best practices that can be adopted by PinCap.

#### **6. Areas to Emphasize**

PinCap has broadly selected four areas of focus under its CSR activities, as under:

##### **Education:**

- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.

##### **Environment Sustainability:**

- Ensuring environmental sustainability ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;
- Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts.

##### **Medical and other Welfare**

- Providing medical relief and rehabilitation to communities who either don’t have access to quality health care or cannot afford it;

- Eradicating hunger, poverty and malnutrition, promoting health care, preventive health care and sanitation and making available safe drinking water;
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- Measures for the benefit of armed forces veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the scheduled castes, the scheduled tribes, other backward classes, minorities and women;
- Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- Rural development projects;
- Slum area development.

[For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.]

### **Emergencies and Natural Calamities**

- PinCap shall provide relief, support, rehabilitation, reconstruction activities etc. for disaster management in case of natural calamities or emergencies etc.

In addition to the Areas to Emphasize specified above, the Company may select any area/ sector/ activity or head of activities, as may be specified in Schedule VII to the Companies Act, 2013 including any amendments or modifications as may be introduced from time to time.

### **7. Undertaking CSR activities**

PinCap may undertake CSR activities either in partnership with a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961 or such other entities prescribed under the Act, who are engaged in activities or programs which fall within the purview of PinCap's CSR Policy and areas of focus, or directly through a company established under section 8 of the Act, or a registered public trust or a registered society, registered under



section 12A and 80 G of the Income Tax Act, 1961, that may be established by PinCap, either singly or along with any other company, for the purpose or both.

## **8. Governance Structure**

A governance structure at PinCap is responsible for implementing and administering CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013 and rules made thereunder. The Board of Directors of the Companies who are ultimately accountable for the CSR projects undertaken by PinCap.

PinCap may constitute a CSR Committee at the Board level. The CSR Committee may be supported by the Board, comprised of representatives from company.

### **CSR Committee:**

Since the annual expenditure liability of PinCap is less than Rs. 50 Lakh, the constitution of CSR Committee is not applicable to the Company. Accordingly, the function of CSR Committee shall be discharged by Ms. Tanvee Upadhyay, Director of the Company under supervision of the Board of Director. However, the Board may constitute CSR Committee as and when provision mandate as per the applicable provisions of the Applicable law and guidelines of Government.

## **9. CSR Budget**

The total budget for the CSR projects in each financial year will be decided by the Board in accordance with applicable provisions of the Act and the CSR Rules. The Board shall propose to distribute the budget among the Areas to Emphasize or such of them as it may deem fit in each financial year, in such proportion and in a manner that meets the objectives of the CSR Policy.

## **10. Implementation Process**

### **10.1 CSR Contributions:**

The Company will endeavour to contribute and spend at least 2% of the average net profits of the Company made during the three immediately preceding financial years or such amount as may be recommended by the CSR Committee from time to time in pursuance of this Policy in Compliance with CSR Provisions.

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## 10.2 Compliance, Monitoring and Reporting

### 10.2.1 Compliance

Board will plan, implement, monitor and manage all CSR projects & activities for PinCap and will work closely with Board of the Company.

Ms. Tanvee Upadhyay will formulate implementation plans for the projects specifying the following:

- Activities to be undertaken.
- Budgets proposed.
- Time frame for implementation.
- Responsibilities and authorities for implementation.
- Results expected to be achieved post implementation.

### 10.2.2 Monitoring

The Board will monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports etc. Mechanisms to track data and monitor projects will be established to ensure the transparency and efficiency of the implementation process. The projects will be evaluated against the milestones defined in the implementation plan of the project.

The Board of the Company shall satisfy itself that the CSR funds disbursed have been utilised for the purposes and in the manner as approved by it and the Authorised person or the person responsible for financial management shall certify to the effect as per applicable rules in this regard.

### 10.2.3 Reporting

The Board, based on reports presented by Ms. Tanvee Upadhyay, will annually publish report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act 2013 and rules made thereunder.

The CSR Policy on being approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

## **11. Treatment of Surplus**

Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within such period and with such terms and conditions as may be prescribed under Section 135 of the Act read with relevant rules applicable.

## **12. Annual Action Plan**

Ms. Tanvee Upadhyay shall formulate and recommend to the Board, an Annual Action Plan in pursuance of the CSR policy, which shall include the following:

- The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act
- The manner of execution of such projects or programmes
- The modalities of utilisation of funds and implementation schedules for the projects or programmes
- Monitoring and reporting mechanism for the projects or programmes
- Details of need and impact assessment, if any, for the projects undertaken by the company

The Board may alter such plan at any time during the financial year.”

## **13. CSR Expenditure**

If the Company spends an amount in excess of the requirements provided under the Act, then the Company may set off such excess amount against the requirement to spend under sub-section 5 of Section 135 for such number of succeeding financial years and in such manner, as may be prescribed under the Act and rules made thereunder.

This CSR Policy is subject to such changes and amendments as may be notified by the Ministry of Corporate Affairs under Section 135 of the Companies Act, 2013 and rules made thereunder and the same shall be read in line with the provisions of the Act applicable to the Company from time to time.

Ms. Tanvee Upadhyay  
Director