



CORPORATE SOCIAL RESPONSIBILITY POLICY

SUNGOLD CAPITAL LIMITED

1. PREAMBLE

Though at present the Clause of Corporate Social Responsibility is not applicable to Sungold Capital Limited, However the company seeks to be a good corporate citizen in all aspects of its operations and activities. It is the Company's intent to make a positive difference to society. It recognizes that it cannot do it all; so that if there are choices to be made, prioritization will be towards doing fewer projects with greater impact and focusing initiatives on communities in which the Company lives and operates.

2. POLICY STATEMENT

- Sungold Capital Limited (“the Company”) believes that Corporate Social Responsibility (“CSR”) extends beyond the ambit of business and should focus on a broad portfolio of assets - human, physical, environmental and social.
- This Policy is framed pursuant to the provisions of Section 135 of the Companies Act, 2013.

3. VISION AND COMMITMENT

Our vision is to drive ‘holistic empowerment’ of the community through implementation of sustainable initiative which will have maximum societal impact by identifying the critical needs and gaps. We shall remain committed to the following operating principle: Conducting business in a socially responsible and ethical Manner; protecting the environment and the safety of people; Supporting human rights; and Engaging, learning from, respecting and supporting the local communities and cultures with which we work.

4. CSR OBJECTIVE

Promote a comprehensive and integrated development through social and economic transformation.

5. CORE CSR COMMITMENTS (PROGRAMS / ACTIVITIES)

- Addressing identified needs of the underprivileged through initiatives directed towards o improving livelihood,
 - a) alleviating poverty,
 - b) promoting education,
 - c) empowerment through vocational skills and
 - d) promoting health and well-being.

SUNGOLD CAPITAL LIMITED

- Preserve, protect and promote art, culture and heritage o promoting India's art, culture and heritage, conducting promotional and developmental activities / programs.
- Ensuring environmental sustainability, ecological balance and protection of flora and fauna o conducting activities which promote biodiversity, conducting activities which promote ecological sustainability.
- Any other activity falling within the scope of Schedule VII of the Companies Act, 2013 which would enable the Company to achieve its CSR objectives.

The CSR programs / activities of the Company, as above, are related / will relate to the activities included in Schedule VII of the Companies Act, 2013.

6. CSR COMMITTEE

The Company's CSR governance structure will be headed at the Board level CSR Committee that will be responsible for CSR activities/ project undertaken. The Committee will report to the Board of Directors of the Company. The CSR Committee shall comprise of at least three directors, one of whom shall be independent director. The Board shall be empowered to modify the composition of CSR Committee, provided that there shall always be at least one independent director as part of CSR Committee or such other composition as may be prescribed from time to time.

7. RESPONSIBILITIES OF CSR COMMITTEE

The CSR committee shall be mainly responsible to;

- Formulate CSR policy, inter-alia in compliance with the section 135 of the Companies Act, 2013 and schedule VII thereof and the Companies Corporate Social Responsibility Policy) Rules 2014.
- Identify and recommend to the Board, from time to time, the activities/ projects in line with such CSR policy and seek its approval for expenditure thereon, from the Board of Directors of the Company.
- Put and institute the transparent monitoring mechanism to review the implementation status of each activities/ project.
- Recommend to the Board, modifications to the CSR policy as and when required.
- Formulate a CSR Management Committee, if required to monitor the approved CSR activities, spending thereon from time to time with a robust and transparent governance structure to oversee the implementation of CSR Policy.

SUNGOLD CAPITAL LIMITED

8. BUDGET

- The Board shall ensure that a minimum of 2% of the average net profits of the Company of the last 3 years is spent on the CSR programs / activities of the Company.
- In case at least 2% of the average net profits of the Company of the last 3 years is not spent in a financial year, reasons for the same shall be specified in the Board's report.
- All expenditure towards the CSR programs / activities will be diligently documented.
- Any surplus generated out of the CSR programs / activities of the Company will not be added to the normal business profits of the Company.
