

Purnartha Investment Advisers Private Limited

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“Corporate Social Responsibility (CSR)” POLICY

Table of Contents

1. Introduction and Background
2. Applicability of CSR under Companies Act, 2013
3. Activities under CSR
4. Implementation
5. Roles and Responsibilities of Board
6. Amendments to the policy

1. Introduction and Background

Registered in 2011, Purnartha Investment Advisers Private Limited is engaged in the business of Investment Advisory & Portfolio Management services.

The term "Corporate Social Responsibility (CSR)" can be referred as corporate initiative to assess and take responsibility for the company's effects on the environment and impact on social welfare. The term generally applies to companies' efforts that go beyond what may be required by regulators or environmental protection groups.

Corporate social responsibility may also be referred to as "corporate citizenship" and can involve incurring short-term costs that do not provide an immediate financial benefit to the company, but instead promote positive social and environmental change.

2. Applicability of CSR under Companies Act, 2013

Corporate Social Responsibility is not a new concept in India, however, the Ministry of Corporate Affairs, Government of India has recently notified the Section 135 of the Companies Act, 2013 along with Companies (Corporate Social Responsibility Policy) Rules, 2014 and other notifications related thereto which makes it mandatory (with effect from 1st April, 2014) for certain companies who fulfil the criteria as mentioned under Sub Section 1 of Section 135 to comply with the provisions relevant to Corporate Social Responsibility.

The companies on whom the provisions of the CSR shall be applicable are contained in Sub Section 1 of Section 135 of the Companies Act, 2013. As per the said section, the companies having Net worth of INR 500 crore or more; or Turnover of INR 1000 crore or more; or Net Profit of INR 5 crore or more during any financial year shall be required to constitute a Corporate Social Responsibility Committee of the Board with effect from 1st April, 2014.

3. Activities under CSR

Following is the list of CSR projects or programs in which the Company may undertake its activities.

- Eradicating hunger, poverty, malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- Promoting education, including special education, to pay fees of students, providing books, stationery, study material, lab & engineering equipment etc., and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- 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;

- 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;
- Measures for the benefit of armed forces veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- Contribution to Prime Minister's 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 Schedule Tribes, other backward classes, minorities and women;
- Contributions or funds provided to technological incubators located within academic institutions which are approved by the Central Government;
- Promoting the activities to support, feed house & rehabilitate peoples rejected by the society.
- Support the NGOs that cater to the needs of the society.
- Provide medical assistance & medical infrastructure.
- Rural development projects.
- Slum area development
- disaster management, including relief, rehabilitation and reconstruction activities
- Any other activities which may be specified by Government from time to time.

4. Implementation

The Company has formed Corporate Social Responsibility Committee (CSR Committee) as per Companies Act, 2013. The CSR Committee shall be responsible for monitoring implementation of the CSR Policy. CSR Committee shall approve and recommend to the Board projects or programs to be undertaken, the modalities of execution, and implementation schedule thereof. The Company ensure that the surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the company.

CSR initiatives will be implemented either directly by the Company through its employees or through implementing partners which include NGOs having an established track record in carrying out specific activity.

Collaborative partnerships will be formed with the Government, the District Authorities, the village panchayats, NGOs and other like-mi need stakeholders. This helps to widen the Company's reach and leverage upon the collective expertise, wisdom and experience that these partnerships bring to the table.

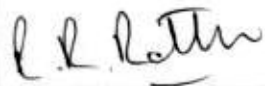
5. Roles and Responsibilities of Board

The Board of the company is responsible for:

- Approving the CSR policy as formulated by the CSR Committee
- Ensuring that in each financial year the Company spends at least 2% of the average net profit before taxation made during the three immediately preceding financial years.
- Ensuring that every financial year funds committed by the Company for CSR activities are utilized effectively, and regularly monitoring implementation.
- Disclosing in its Annual Report the names of CSR Committee members, the content of the CSR policy and expenditure made on CSR activities.
- Ensuring that the company spends, in every financial year, at least two per cent of the average net profits.
- To undertake CSR activities as approved by CSR Committee.
- To comply with the provisions of CSR as per Companies Act, 2013 and rules made thereunder.

6. Amendments to the policy

The Board of Directors on its own and/or on the recommendation of CSR committee can amend its policy as and when required deemed fit. Any or all provisions of CSR Policy would be subjected to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.



Rahul Ramkumar Rathi
Chairman
DIN: 00966359



Hemant Ashok Vispute
Managing Director
DIN: 05009424