B-12, Hosiery Complex, Phase-2 Extn.
Noida, Uttar Pradesh, INDIA 201 305
Tel: 91-120-4208000-05
Email: dimple@dimplecreations.com
Website: www.dimplecreations.com
CIN NO.: U74899DL1982PTC013282

AEO
भारतीय सीमा शुल्क
INDIAN CUSTOMS

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

OF
DIMPLE CREATIONS PRIVATE LIMITED

Policy	Corporate Social Responsibility (CSR) Policy
Company	Dimple Creations Private Limited
Original Policy	Effective from 1 April 2015
Revision	Revised and updated policy incorporating current CSR framework and amended CSR Committee composition
Approval	To be effective from the date of approval by the Board of Directors

Prepared for Board approval and corporate records

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1. PREAMBLE

Dimple Creations Private Limited (the "Company" or "DCPL") recognizes that sustainable business growth is linked with the social and economic development of the communities in which it operates. The Company is committed to undertaking meaningful Corporate Social Responsibility ("CSR") initiatives in accordance with Section 135 of the Companies Act, 2013 ("Act"), Schedule VII to the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("CSR Rules"), each as amended from time to time.

This Policy replaces and updates the Company's earlier CSR Policy, while preserving its original emphasis on community welfare, sustainable skill development, education, employability and empowerment.

2. TITLE, OBJECTIVE AND APPLICABILITY

2.1 This Policy shall be called the "Corporate Social Responsibility Policy of Dimple Creations Private Limited" ("CSR Policy").

2.2 The objective of this Policy is to set out the guiding principles for selection, implementation and monitoring of CSR activities and for formulation of the Company's annual action plan.

2.3 This Policy shall apply whenever Section 135 of the Act and the CSR Rules are applicable to the Company.

2.4 The revised Policy shall take effect from the date on which it is approved by the Board of Directors of the Company.

3. DEFINITIONS

"Act" means the Companies Act, 2013, as amended from time to time.

"Administrative Overheads" means the expenses incurred by the Company for general management and administration of CSR functions, but excluding expenses directly incurred for designing, implementation, monitoring and evaluation of a particular CSR project or programme, as defined under the CSR Rules.

"Board" means the Board of Directors of Dimple Creations Private Limited.

"Company / DCPL" means Dimple Creations Private Limited.

"CSR" means Corporate Social Responsibility as contemplated under Section 135 of the Act and the CSR Rules.

"CSR Committee" means the Corporate Social Responsibility Committee constituted by the Board, wherever such committee is required under applicable law.

"CSR Expenditure" means expenditure incurred by the Company towards eligible CSR activities in accordance with the Act, Schedule VII and the CSR Rules.

"Ongoing Project" means a multi-year CSR project satisfying the definition and conditions prescribed under the CSR Rules.

"Policy" means this Corporate Social Responsibility Policy, as amended from time to time.

Words and expressions not defined in this Policy shall have the meanings assigned to them under the Act and the CSR Rules.

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4. CSR VISION AND GUIDING PRINCIPLES

The Company shall endeavour to create sustainable social value through responsible interventions for communities, with particular emphasis on activities falling within Schedule VII to the Act. The Company shall seek measurable, transparent and need-based outcomes and, where appropriate, give preference to local areas around its operations, without treating such preference as an exclusive limitation.

- Undertake CSR activities only within the scope permitted by the Act, Schedule VII and the CSR Rules.
- Promote sustainability, inclusion, education, vocational skills, employability, livelihood enhancement and other eligible social-development objectives.
- Adopt transparent project selection, implementation, utilisation, monitoring and reporting processes.
- Ensure that CSR activities are not undertaken for the exclusive benefit of employees of the Company and their families and are not activities undertaken in the normal course of business, except to the extent expressly permitted by law.

5. CSR FOCUS AREAS

Subject to Schedule VII to the Act and the annual action plan approved by the Board, the Company may undertake CSR projects or programmes in areas including:

- education, special education, employment-enhancing vocational skills and livelihood enhancement;
- skill development, including training connected with apparel and textile sector skills where such activity qualifies under Schedule VII;
- healthcare, sanitation, safe drinking water and nutrition;
- women empowerment, social and economic equality and support for disadvantaged sections;
- environmental sustainability and conservation of natural resources;
- rural development projects and slum-area development;
- disaster management, including relief, rehabilitation and reconstruction activities; and
- such other activities as are included in Schedule VII to the Act from time to time.

The inclusion of an area above does not by itself authorise expenditure; each project must independently satisfy the applicable legal requirements.

6. CSR BUDGET, EXPENDITURE AND FINANCIAL PRINCIPLES

6.1 The Board shall ensure that the Company spends, in every financial year in which Section 135 applies, at least the amount required under Section 135(5) of the Act, presently two per cent of the average net profits of the Company made during the three immediately preceding financial years, calculated in accordance with the Act.

6.2 The Company shall give preference to local areas and areas around where it operates for spending the amount earmarked for CSR activities, in accordance with Section 135(5).

6.3 Administrative overheads shall not exceed the limit prescribed under the CSR Rules.

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6.4 Any surplus arising out of CSR activities shall not form part of the business profit of the Company and shall be dealt with strictly in the manner prescribed under the CSR Rules, including ploughing it back into the same project, transfer to the Unspent CSR Account for spending pursuant to the CSR Policy and annual action plan, or transfer to a fund specified in Schedule VII, as applicable.

6.5 Excess CSR expenditure may be set off against the CSR spending requirement of succeeding financial years only to the extent and subject to the conditions permitted under the Act and CSR Rules and pursuant to the requisite Board resolution.

6.6 Capital assets created or acquired out of CSR expenditure shall be held in the manner permitted under the CSR Rules.

7. CSR COMMITTEE

7.1 Composition

The CSR Committee of the Company shall comprise the following members:

S. No.	Name	Designation
1	Mrs. Ravija Nayyar Duggal	Chairman
2	Mr. Prakash Prabhakar	Member
3	Mr. S. K. Joshi	Member
4	Mr. Jose Abraham	Member

The Board may reconstitute the CSR Committee from time to time in accordance with applicable law. Where the constitution of a CSR Committee is not legally required because the amount to be spent under Section 135(5) does not exceed the statutory threshold specified in Section 135(9), the functions of the CSR Committee shall be discharged by the Board.

7.2 Functions and Responsibilities

- formulate and recommend the CSR Policy and amendments thereto to the Board;
- recommend the amount of CSR expenditure to be incurred;
- formulate and recommend an annual action plan in pursuance of this Policy;
- identify and recommend eligible CSR projects and programmes;
- recommend modalities of execution, fund utilisation and implementation schedules;
- recommend monitoring and reporting mechanisms for CSR projects;
- review progress and utilisation of CSR funds periodically; and
- perform such other functions as may be prescribed under the Act or CSR Rules or entrusted by the Board.

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8. ANNUAL ACTION PLAN

For every financial year in which CSR obligations apply, the CSR Committee shall formulate and recommend to the Board an annual action plan in pursuance of this Policy. The annual action plan shall contain, as applicable:

- the list of CSR projects or programmes approved to be undertaken in areas or subjects specified in Schedule VII;
- the manner of execution of such projects or programmes;
- modalities of utilisation of funds and implementation schedules;
- monitoring and reporting mechanism for the projects or programmes; and
- details of need and impact assessment, if any, for the projects undertaken by the Company.

The Board may alter the annual action plan during the financial year, based on a reasonable justification and recommendation of the CSR Committee, where applicable.

9. MODE OF IMPLEMENTATION

9.1 CSR activities may be undertaken directly by the Company or through one or more eligible implementing agencies in accordance with Rule 4 of the CSR Rules.

9.2 Where an implementing agency is engaged, the Company shall ensure that it satisfies the applicable eligibility requirements, including registration requirements under the Income-tax Act, 1961 and registration on the MCA portal through Form CSR-1, wherever required.

9.3 The Company may collaborate with other companies for undertaking CSR projects or programmes, provided the CSR Committees/Boards of the participating companies are able to report separately on such projects or programmes in accordance with law.

9.4 The Board shall satisfy itself that CSR funds disbursed have been utilised for the purposes and in the manner approved. The Chief Financial Officer or the person responsible for financial management shall provide the certification required under the CSR Rules.

10. ONGOING PROJECTS AND UNSPENT CSR AMOUNTS

10.1 Amounts remaining unspent in relation to an Ongoing Project shall be transferred, within the statutory period, to a special account titled “Unspent Corporate Social Responsibility Account” and shall be spent within the period prescribed under Section 135(6) of the Act.

10.2 Any unspent CSR amount not relating to an Ongoing Project shall be transferred to a fund specified in Schedule VII within the period prescribed under Section 135(5) of the Act.

10.3 The Company shall maintain appropriate records to identify project-wise commitments, expenditure, unspent amounts and transfers.

11. MONITORING, REVIEW AND IMPACT ASSESSMENT

11.1 The CSR Committee and/or the Board, as applicable, shall monitor the implementation of CSR projects with reference to approved timelines, budgets, outputs and utilisation of funds.

11.2 Implementing agencies may be required to submit periodic progress reports, utilisation statements, supporting records and completion reports.

11.3 The Board shall monitor Ongoing Projects and may make modifications for smooth implementation within the overall permissible time period.

11.4 Where the Company falls within the criteria prescribed under the CSR Rules for impact assessment, impact assessment shall be undertaken through an independent agency in the manner and within the limits prescribed by law.

12. CSR REPORTING AND DISCLOSURES

12.1 The Board's Report shall include the annual report on CSR containing the particulars prescribed under the Act and CSR Rules.

12.2 The Company shall disclose on its website, if any, the composition of the CSR Committee, CSR Policy and CSR projects approved by the Board, to the extent required by the CSR Rules.

12.3 Statutory filings relating to CSR, including Form CSR-2 or any successor form, shall be made as applicable within the prescribed timelines.

13. EXCLUSIONS

CSR activities shall not include activities excluded under the CSR Rules, including activities undertaken in the normal course of business except where specifically permitted, activities undertaken outside India except as permitted for training of Indian sports personnel, contributions to political parties, activities benefiting employees exclusively, sponsorship activities deriving marketing benefits, and activities carried out for fulfilment of statutory obligations.

14. GENERAL

14.1 In case of any conflict between this Policy and the Act, Schedule VII, CSR Rules or any statutory amendment, notification, circular or clarification having binding effect, the applicable law shall prevail and this Policy shall be read accordingly.

14.2 The Board may amend, modify, substitute or withdraw this Policy, based on the recommendation of the CSR Committee where applicable, subject to applicable law.

14.3 Any matter not specifically covered by this Policy shall be dealt with by the Board in accordance with the Act and CSR Rules.

15. APPROVAL

This revised CSR Policy is placed before the Board of Directors of Dimple Creations Private Limited for consideration and approval. Upon approval, it shall supersede the earlier CSR Policy to the extent of inconsistency.

Dimple Creations Pvt Ltd
(Govt. Recognized Apparel Export House)

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For Dimple Creations Private Limite

For DIMPLE CREATIONS PVT. LTD

Director

Mrs. Ravija Nayyar Duggal
Chairman - CSR Committee

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ANNEXURE A - INDICATIVE CSR PROJECT / PROGRAMME AREAS

Consistent with the Company's earlier CSR Policy and subject always to Schedule VII and the annual action plan, the Company may support skill-development and livelihood programmes, including programmes for vocational training relevant to the apparel and textile sector such as sewing machine operation, garment checking, garment finishing and other employment-enhancing skills.

Specific projects, beneficiaries, implementing agencies, budgets, timelines, monitoring indicators and fund-utilisation modalities shall be approved through the annual action plan and project documentation. Any implementing agency engaged by the Company must satisfy the eligibility and registration requirements applicable at the relevant time.

ANNEXURE B - MINIMUM ANNUAL ACTION PLAN FORMAT

Particular	Details
Project / Programme name	To be approved by the Board
Schedule VII area	To be approved by the Board
Location	To be approved by the Board
Objective and beneficiaries	To be approved by the Board
Implementation mode / agency	To be approved by the Board
Budget	To be approved by the Board
Implementation schedule	To be approved by the Board
Fund-utilisation modalities	To be approved by the Board
Monitoring / reporting mechanism	To be approved by the Board
Need / impact assessment, if applicable	To be approved by the Board