

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

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Pureplay Skin Sciences (India) Private Limited ("PUREPLAY" Or "the Company") conducts its business as a responsible corporate and believes in holistically addressing all issues related to People, Planet and Profit for a sustainable business and better future for all living beings and is committed to achieve inclusive growth of the marginalized and deprived sections Of the society through its CSR initiatives to be implemented within the geographical boundaries of India, with preference to its Operational Areas, by supplementing government's effort and/or by making independent efforts.

VISION

To support responsible and sustainable initiatives, while taking care of the concern for People, Planet and Profit.

MISSION

Continually enhance the triple bottom line benchmarks of economic, environmental and social performance through broad involvement of the employees and other relevant stakeholders.

To develop social wealth for the communities we engage with.

Promote efficient usage of scarce resources, encourage green energy initiatives and develop innovative solutions to fulfil the vision by stepping beyond the mandatory provisions.

PURPOSE

This CSR policy is a policy statement containing the intent, approach and direction given by the board of PUREPLAY, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan, mode of implementation of CSR projects, monitoring mechanisms to monitor implementation of CSR projects of PUREPLAY.

SCOPE & INTERPRETATION

PUREPLAY has developed this Corporate Social Responsibility (CSR) inconsonance with the CSR Policy framework enshrined in the Section-135 of Companies Act, 2013 (Act) and in accordance with the Companies (CSR Policy) Rules, 2014 (Rules) notified by Ministry of Corporate Affairs, Government of India and subsequent amendments in the (Rules) and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 notified by the Ministry of Corporate Affairs, Government of India.

GOVERNANCE

Board of PUREPLAY, taking into account the recommendations of its CSR Committee, will devise guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan of CSR activities in PUREPLAY, mode of implementation of CSR projects, monitoring mechanisms to monitor implementation of CSR projects of PUREPLAY and assess the impact of its CSR projects on Sustainable Development Goals;

Board of PUREPLAY shall also approve multi- year project undertaken PUREPLAY in fulfilment of its CSR obligations having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi- year project but whose duration has been extended beyond one year by the board of PUREPLAY based on reasonable justification;

In case of ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year- wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

Board of PUREPLAY may alter Annual Action Plan of CSR activities at any time during the financial year, as per the recommendation of its CSR Committee of the board, based on the reasonable justification to that effect.

Board of PUREPLAY shall ensure that Administrative Overheads shall not exceed 5% of the total CSR Expenditure of the company for the financial year;

The Board of PUREPLAY shall satisfy itself that the funds disbursed for implementing CSR projects have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or any other person responsible for financial management shall certify to the effect.

The Board of PUREPLAY shall monitor the progress of approved CSR projects and programs with respect to timelines.

The monitoring framework of implementation of CSR project shall be devised by PUREPLAY with the help of expert organizations.

The CSR Committee of the Board shall formulate and recommend to the Board an Annual Action Plan in pursuance of its CSR Policy, which shall include the following, namely:

- (a) The list of CSR projects or programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- (b) The manner of execution of such projects or programs as specified in sub-rule (1) of rule 4 inter alia including CSR activities to be undertaken by the Company by itself or through the following:
 - (i) 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 (43 of 1961), established by the company, either singly or along with any other company, or
 - (ii) 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, and having an established track record of at least three years in undertaking similar activities;
- (c) The modalities of utilization of funds and implementation schedules for the projects or programs;
- (d) Monitoring and reporting mechanism for the projects or programs; and
- (e) Details of need and impact assessment, if any, for the projects undertaken by the Company.

CSR ACTIVITIES

Projects /Programs will be identified by the Board or any Director as authorized by the Board or the Committee across India.

Budgets will be allocated for CSR projects through a process incorporating identification of suitable implementation agencies, need assessment (wherever required) and clear outlining of desired outcomes of CSR projects. The CSR projects/ programs/ initiatives, to be undertaken must fall within the preview of Schedule —VII of the Companies Act, 2013 (as amended from time to time).

All CSR activities will be in the form of projects/ programs, which will, as far as possible, entail the following components:

1. Need Based Assessment/ Base line survey/ Study where considered necessary/ feasible;
2. Identification of specific and measurable objectives/ goals in identified sectors and geographies;

3. Formation of the project and preparation of Detailed Project Report (DPR);
4. Identification of timelines— clear specification of start date and end date;
5. Specification of annual financial allocation;
6. Clear identification of beneficiaries (by name where possible);
7. Clear identification of milestones for the complete duration of the Project/ program;
8. Preparation and signing of agreement with Implementing Agencies;
9. Preparation and implementation of a comprehensive and concurrent documentation procedure;
10. Robust, periodic review & monitoring;
11. Evaluation & Assessment, preferably both concurrent and final (wherever possible, by a competent third party);
12. Mandatory Reporting on Management Information System devised for the purpose of monitoring progress of CSR projects.

PUREPLAY would assign priority to multi- year projects/ programs of medium or long duration having timelines not exceeding 3 years (excluding the year in which it was approved) in order to ensure emphasis on long-term outcomes/ impacts.

PUREPLAY will emphasis on the sustainability of its projects/ programs to ensure them remain relevant and viable even upon disengagement at the end of the project period.

PUREPLAY will explore possibilities for collaborating/ co- operating with other Corporate / National /Multi- lateral / Bi- lateral Agencies in order to synergize its efforts and increase both financial resources as well as outcomes and impact in such a manner that the CSR Committee is in a position to report separately on such projects or programs in accordance with the rules.

PUREPLAY may also consider participation in larger Projects / Programs where more than one Corporate / National / Multi-lateral / Bi-lateral Agency is involved in such a manner that the CSR Committee is in a position to report separately on such projects or programs in accordance with the rules.

CSR PLANNING

To assist in planning of the activities, the indicative budget allocation for broad sector of Activities will be delineated in the Annual Action Plan which shall be formulated and recommended by the CSR Committee and submitted to the Board for approval and shall include the following:

- a) The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule-VII of the Act;
- b) The manner of execution of such projects or programs as specified in sub-rule 1 of rule 4 of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021;
- c) The modalities of utilisation of funds and implementation schedules for the projects or programs;
- d) Monitoring and reporting mechanism for the projects or programmes; and
- e) Details of need and impact assessment, if any, for the projects undertaken by the company:

However, the Board may alter such plan any time during the financial year based on reasonable justification to that effect.

Broadly, the CSR Annual Action Plan for CSR Activities will be in line with the CSR Strategy of PUREPLAY with focus on Healthy Environment, Education, Healthcare, Nutrition and activities as mentioned in Schedule VII of the Companies Act, 2013. To check whether it can be related with AP – Point B and if not then refine this.

CSR IMPLEMENTATION

Implementation of the CSR projects or programs shall be done directly by the company or through the agencies fulfilling the criteria laid down under the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (and as amended from time to time). Implementing agencies shall necessarily be fulfilling the criteria of this Policy. Only duly registered agencies on MCA portal with a valid CSR registration number will be hired for CSR project implementation.

CSR BUDGET AND CSR EXPENDITURE

The Board of PUREPLAY will ensure that in each Financial Year (FY), at least two percent of the average net profit (calculated as per Section 198 of the Companies Act 2013) accrued during the three immediately preceding Financial Years is spent on CSR activities/ projects/ programs.

The Board of PUREPLAY will satisfy itself that the funds disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or any other person responsible for financial management shall certify to the effect.

In the event, that amount indicated above is not spent in its entirety in that Financial Year, the reasons there of will be outlined as per Section 134 (3) (o) of the Act to be shared with all the stakeholders through the Annual Report and the unspent amount shall be transferred to any fund included Schedule-VII of the Act until such a fund is specified in Schedule - VII.

In an event where PUREPLAY makes any surplus or profit from pursuing the CSR projects/ programmes, these will not form part of the business profit but will, instead 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 transferred to a fund specified in Schedule - VII, within a period of six months of the expiry of the financial year.

In an event where CSR expenditure is in excess of requirement as per Section 135 of Companies Act, 2013, such excess amount may be set-off against the requirement to spend as per Section 135 of Act, up to immediate succeeding three financial years subject to the condition that:

- a) This excess amount shall not include any surplus arising out of CSR projects; and
- b) Board of PUREPLAY shall pass a resolution to this effect

Any capital asset created/ acquired out of CSR funds shall be held by a company established under Section 8 of the Companies Act, 2013, or a registered Public Trust or Registered Society having charitable objects and CSR Registration Number, or beneficiaries of the said project, in the form of self-help groups, collectives, entities or a Public Authority as defined in in clause (h) of Section 2 of the Right to Information Act, 2005 (22 of 2005);

Expenditure towards Impact Assessment will be booked towards Corporate Social Responsibility for that financial year, which shall not exceed five percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is less.

For all contributions received from other companies / sources towards the CSR Corpus / Budget, PUREPLAY will claim CSR expenditure only for funds that are provided from its own resources.

MONITORING & EVALUATION

In case of ongoing project, the Board of a Company will monitor the implementation of the project with reference to the approved timelines and year- wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

A Monitoring mechanism will be devised by PUREPLAY to ensure that the CSR process functions as mandated by the Act and the Rules, ensuring that all Projects/ Programmes are duly implemented as budgeted.

IMPACT ASSESSMENT/ EVALUATION OF CSR

In order to assess the impact of its CSR Projects and Programmes, maximize outcomes and build- in sustainability, scalability and replicability, PUREPLAY shall undertake the following activities:

Wherever possible, Base line data shall be collected before start of the project.

As far as possible efforts will be made to use Quasi Experimental Research design for assessing the impact of CSR projects:

Impact Assessment, through an independent agency, shall be undertaken for CSR projects having an outlay of ₹1 crore or more and which have been completed not less than one year before undertaking such impact study.

Placing before the Board, the Impact Assessment reports and annexing the same to the annual report on CSR.

REPORTING

PUREPLAY will make a full report of its CSR projects / programmes undertaken during the previous year in the format prescribed for the "Annual Report on CSR Activities to be included in the Board's Report" in the Companies (CSR Policy) Amendment Rules, 2021 which is in consonance with Section 134(3)(0) of the Act.

DOCUMENTATION

PUREPLAY will endeavour at all times to put in place, for all projects/ programmes, an effective documentation process. The comprehensive documentation would include — printed material, audio recordings, video recordings etc.

Also, Project completion report documenting the key project parameters, implementation process, deliverables envisaged and the outcome achieved along with the timelines and the suggestions/ recommendations for scalability and replicability of the project may be developed wherever feasible.

Documentation of all data generated during project execution shall be maintained by the Company.

DISCLOSURE

PUREPLAY shall comply with Section 135(2), 135(4)(1) and 134(3)(0) of the Act thereby ensuring that it makes a full disclosure of its CSR Policy, Strategy, Projects/ Programmes, Activities, monitoring mechanism, Implementing Agencies, Expenditure details as well as the composition of the CSR Committee of the Board.

EFFECTIVE DATE This Corporate Social Responsibility (CSR) Policy was approved by the Board of Directors of Pureplay Skin Sciences (India) Private Limited at its meeting held on February 06, 2026 and shall be effective from the same date.