

**CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR)  
of  
PLAY GAMES24x7 PRIVATE LIMITED**

**1) INTRODUCTION**

Corporate Social Responsibility (CSR) is the contribution of businesses to the development of society. The goal is to share responsibility with organizations that are working for social welfare to make a positive impact in the society while undertaking business activities in normal course. CSR is defined as the integration of business operations and values, whereby the interests of all stakeholders including investors, customers, employees, the community and the environment are reflected in the Company's policies and actions. Hence, the CSR commitment of PLAY GAMES positions its social and environmental consciousness as an integral part of its business.

Considering the aforementioned objective, Play Games24x7 Private Limited ("COMPANY" or "PLAY GAMES") has come forward to practice its corporate values which include, amongst protecting the interests of its own human resources, contributing purposefully to the society in general. .

This CSR Policy has been formulated as per the Notification dated 27<sup>th</sup> February, 2014 issued by Ministry of Corporate Affairs regarding Companies (Corporate Social Responsibility Policy) Rules, 2014 and Schedule VII and Section 135 of Companies Act, 2013.

**2) SCOPE AND APPROACH**

The CSR Policy of PLAY GAMES aims to support and contribute for betterment of society and strengthen the responsible business practices that balance financial growth with social wellbeing.

For the purpose of meeting the objective of this Policy, the Company will take into consideration activities which are referred under Schedule VII of the Companies Act, 2013 where activities which can be considered as part of CSR are listed.

The focus of PLAY GAMES shall not be limited to the geographical areas around its corporate presence.

**3) GUIDING PRINCIPLES:**

The strategies for designing, implementing and monitoring the CSR activities of PLAY GAMES are based on activities suggested in Companies (Corporate Social Responsibility Policy) Rules, 2014; Schedule VII and Section 135 of Companies Act, 2013 relating to Corporate Social Responsibility.

PLAY GAMES would identify and formulate programmes in order to address/ respond to social needs with full involvement in a time bound manner. For this purpose below is the list of sample activities that can be undertaken by the Company towards the achievement of the CSR goal and objectives. These are by no means an exhaustive list and will be reviewed and modified from time to time by the CSR Committee.

The programme focus of the PLAY GAMES's CSR activities includes, but shall not be limited to:

- (i) eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) 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;
- (iv) 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;
- (v) 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;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports;
- (viii) 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;
- (ix) contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) rural development projects;
- (xii) slum area development.

For the purpose of undertaking CSR activities Company may undertake steps on its own by formulating and executing projects in this regard or may join hands with existing organisation working for this purpose.

#### **4) CONTROL & IMPLEMENTATION MECHANISM**

- i) The Corporate Social Responsibility functions of PLAY GAMES will be co-ordinated and monitored by a CSR Committee constituted by the following persons are the members of the CSR Committee:
  - (a) Bhavin Pandya - Chairman
  - (b) Jonathan A Sawyer
  - (c) John Salter
- ii) Towards achievement of the CSR targets, the CSR Committee will identify opportunities for CSR activities within the broad framework outlined in this policy. The Committee will

additionally be responsible for facilitating selection of appropriate agencies or in house administration staff for implementation, supervising and monitoring the quality of work and reporting to the Board about the progress of CSR objects. The Committee will, from time to time, also provide necessary inputs into the preparation of the Annual CSR plan. Furthermore, the beneficiary agencies must be registered trusts, societies or a company established under section 8 of the Companies Act, 2013 so as to fulfil the criteria for their eligibility under Notification dated 27<sup>th</sup> February, 2014 issued by Ministry of Corporate Affairs regarding Companies (Corporate Social Responsibility Policy) Rules, 2014, for which suitable documentation as an evidence should be kept.

- iii) Within the overall framework of the CSR Policy, the CSR Committee will facilitate the development of an annual CSR action plan and allocate budget not less than 2% of the average net profit of the Company during three immediately preceding financial years. This will include projects identified by the CSR Committee at various locations. The Annual CSR Plan detailing the individual projects and budgeting will become operational after review and approval by the PLAY GAMES Board.
- iv) The CSR Committee will have the option to co-ordinate, assist and join hands with a range of stakeholders including Civil Society Organizations, Community based organizations and other public and private sector enterprises to undertake the CSR activities as per this Policy. CSR Committee will be free to seek services of technical experts for effective execution of this CSR Policy. PLAY GAMES may enter into agreements with these agencies and/ or experts on agreed terms of reference including detailed work plans with budgets and timelines.
- v) CSR Committee will prepare Annual plans, follow up on financial and programme targets, recommend CSR projects, facilitate agencies selection, co-ordinate periodic monitoring and evaluation visits, provide feedback to the implementing organizations and report to the Board of PLAY GAMES.
- vi) While identifying the CSR initiative the following considerations will be taken into account:
  - Thrust of the schemes/projects should be in the identified CSR priority activities of PLAY GAMES
  - While implementing the identified projects, time frames and milestones will be predefined.

The financial limits for CSR projects shall always be approved by the Board of Directors of the Company.

## **5) ALLOCATION OF FUNDS**

- (i) The CSR Budget, in every financial year, shall be two per cent or more of average net profits of PLAY GAMES made during the three immediately preceding financial years, as per the Companies (Corporate Social Responsibility Policy) Rules, 2014 and Schedule VII and Section 135 of Companies Act, 2013 on CSR, which shall be approved by the PLAY GAMES Board.
- (ii) Fund disbursement to implementing organisations would be done with the recommendation of the CSR Committee after the requisite documentation between PLAY GAMES and the beneficiary organisation.

## **6) REVIEW AND REPORTING**

- (i) CSR Committee will meet on need basis to review the progress of proposed activities as per agreed targets and timelines.
- (ii) An annual report of the activities undertaken under the CSR initiatives will be prepared as prescribed by law and suitably integrated into the Director's Report.
- (iii) CSR Committee will monitor the CSR activities done under the approved Annual CSR Plan.

**7) DISPLAY**

- (i) This CSR Policy will be displayed on the website of PLAY GAMES.
- (ii) The significant contents of this Policy as notified by law will be disclosed in the Board's Report of PLAY GAMES.

**8) GENERAL**

- (i) The Company reserves the right to modify, cancel, add, or amend any of the above contents of the Policy subject to the approval of Board of PLAY GAMES.
- (ii) Any or all provisions of the CSR Policy shall be subject to revision/amendment in accordance with the Companies Act, 2013 and any notifications on the subject as may be issued by Ministry of Corporate Affairs, from time to time.
- (iii) In case of doubt with regard to any of the provision of the Policy and also in respect of matters not covered herein, the interpretation & decision of the Board of PLAY GAMES shall be final.

For **Play Games24x7 Private Limited**

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Director