CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Introduction:

INOXPA INDIA PRIVATE LIMITED was incorporated under the Companies Act, 1956 on May 14, 2008.

INOXPA INDIA PRIVATE LIMITED has a Vision "to expand internationally in a global market which presents many opportunities."

And Mission that "INOXPA INDIA PRIVATE LIMITED" shall promote the innovation of production materials and the generation of wealth in all of the markets where it operates and have manufacturing capacity. These accomplishments at local level would strengthen the company to expand."

2. Definitions:

Unless the context so requires, the terms used herein shall have meaning assigned herein:

(i) "Act" means Companies Act, 2013

(ii) "Average Net Profit" shall have the same meaning as prescribed in Section 135 of the Act read with the Rules.

(iii) "Board" shall mean Board of Directors of INOXPA INDIA PRIVATE LIMITED.

(iv) "CSR activities" shall mean the projects or programs or activities undertaken / to be undertaken by INOXPA INDIA as prescribed in Clause 5.

(v) "CSR Committee" shall mean a Committee duly constituted by the Board pursuant to provisions of Section 135 of the Act.

(vi) "CSR Policy" shall mean Corporate Social Responsibility Policy of INOXPA INDIA PRIVATE LIMITED.

(vii) "Company" shall mean INOXPA INDIA PRIVATE LIMITED.

(viii) "Rules" means Companies (Corporate Social Responsibility Policy) Rules, 2014 which were made effective from April 1, 2014, and as may be amended from time to time.

3. Scope:

The CSR relates to the activities to be undertaken by the Company as specified in Schedule VII to the Act and the expenditure thereon, excluding activities undertaken in pursuance of normal course of business of the Company.

4. Aims and Objectives:

As a responsible corporate entity, INOXPA INDIA PRIVATE LIMITED will consistently strive for opportunities to meet the expectation of its stakeholders by pursuing the concept of sustainable development with focus on the following: -

a) Integrate social goals and to address the aspirations of the Stakeholders, in line with the practice of sustainable development and inclusive growth;

b) Be responsible and responsive corporate citizen through endeavours to create a safe, harmonious and ecologically balanced environment for its members and the community at large.

c) Maintain commitment to quality, health and safety in every aspect of the business and people.

5. Activities under Corporate Social Responsibility:

INOXPA INDIA PRIVATE LIMITED would endeavour to adopt an integrated approach to address the community, societal & environmental concerns viz., Eradicating hunger, poverty and malnutrition, empowering women, and measures for reducing inequalities faced by socially and economically backward groups, promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood, enhancement projects by taking up projects or programs as covered under Schedule VII under Section 135 of the Act.

6. Locations/Geography of CSR Activities:

The CSR activities will be taken up in the local area and areas around it where INOXPA INDIA PRIVATE LIMITED operates. Apart from it, CSR activities may also be taken up in urban, rural and tribal communities.

7. Undertaking CSR activities:

The CSR activities will be carried out by INOXPA INDIA PRIVATE LIMITED through Donations or itself or through Trust and/or any foundation as established or by a registered society or by a Company established under Section 8 of the Companies Act, 2013 (collectively hereafter referred to as "Agency").

8. Implementation Mechanism:

While identifying the CSR activities, INOXPA INDIA PRIVATE LIMITED and Agency would consider the following broad parameters while selection of projects or programs:

8.1) Preference should be given to the local areas and areas where INOXPA INDIA PRIVATE LIMITED has its Offices and its projects.

8.2) CSR activities initially would be undertaken in the form of donation, so as to create social impact and visibility and later on as project or program based as the team can be built gradually for carrying on the same.

8.3) While implementing the identified projects or programs, time frames and milestones should be predefined.

8.4) CSR activities may be based on fundamentals of sustainable development

9. Planning and Co-ordination:

9.1) The specific projects or programs will be identified and formulated based on need assessment surveys for identifying the specific areas of concern. Based on the survey, a detailed project or program report will be prepared by the Agency or any specified personnel, detailing the need for the specific project/program, or donation specifying the time frame for implementation and budget.

9.2) The Company will prepare an annual plan for each year within the budgetary provisions and will be placed before the CSR Committee for recommendation to the Board for their approval.

9.3) The target beneficiaries, the local authorities, professionals and institutions etc. involved in similar activities, if need be, may be consulted/ associated in the process of planning and implementation of the CSR activities.

9.4) Agency/ Company or the Authorised Donee will hire professionals on need basis wherever considered necessary to plan and implement various projects.

9.5) The focus of delivering services /benefits will be in line with the CSR activities mentioned in this document and as per programs, projects and schemes approved.

10. Budget for CSR activities:

10.1) The CSR Committee shall, after the end of each financial year, recommend to the Board, the amount of expenditure to be incurred on the CSR activities.

10.2) All administrative expenses including expenditure on wages and salaries, tours and travels, training and development of personnel deputed on CSR activities would be included in the amount of expenditure to be incurred on CSR activities.

10.3) The expenditure on CSR activities shall include all expenditure on projects or programs relating to CSR activities, but does not include any expenditure on an item not in conformity or not in line with CSR activities.

10.4) Based on the total approved Budget, the Director/Executive Director of the Company would be authorized to allocate funds for different projects on the basis of identified CSR plans on yearly basis, under different budget heads for undertaking CSR activities.

11. Monitoring Process of CSR Policy:

11.1) The Company would be responsible for needs assessment of the surrounding locations, preparation of CDAP (Community Development Action Plan), implementation, reporting and monitoring on the physical and financial progress of the CSR activities on a regular basis.

11.2) Agency to form a team, comprising of such number of executives as may be required, in consultation with the Company, for implementation of CSR activities.

11.3) A group of members among HR department and Compliance department at the registered office would be identified for coordinating CSR activities and related responsibilities.

11.4) The implementation and progress of CSR activities shall be monitored by the Companies senior management.

11.5) The CSR Policy shall be monitored by the CSR Committee from time to time, as and when required.

11.6) On advice of CSR Committee, selected CSR activities may be taken up for evaluation through an outside agency.

11.7) The CSR Committee would also provide required feedback and inputs to formulate and improve the projects or programs, from time to time, as per need and requirement.

11.8) Efforts will also be made to quantify the impact made by CSR activities, to the best possible extent, with the baseline data/existing status surveys developed before the start of any CSR activities.

12. Reporting:

12.1) A yearly report on activities / projects identified / implemented shall be submitted to CSR Committee.

12.2) Based on the monitoring reports collected from Agency, the activities undertaken by the Company will be reported and form part of the Board's Report of the Company.

12.3) The Board of Directors of the Company will also be kept informed, from time to time, on the CSR activities undertaken by the Company.

13. General:

13.1) The surplus arising out of CSR projects or programs shall not form part of the business profits of the Company.

13.2) Any amendment or modification to the CSR Policy shall be approved by the Board.

13.3) The contents of this Policy shall be disclosed in the Board's report.