

1. INTRODUCTION

Corporate Social Responsibility (CSR) is the Company's commitment to its stakeholders to conduct business in an economically, socially and environmentally sustainable manner that is transparent and ethical.

Indore Composite Private Limited in India is committed to undertake CSR activities in accordance with the provisions of Section 135 of the Indian Companies Act, 2013 and related Rules.

Indore Composite Private Limited commits itself to contribute to the society in ways possible for the organization and has set up its committed core CSR team, as a means for fulfilling this commitment.

2. AIMS & OBJECTIVES

To develop a long-term vision and strategy for achieving Indore Composite Private Limited CSR objectives and to establish relevance for potential CSR activities for Indore Composite Private Limited core business and create an overview of activities to be undertaken, in line with Schedule VII of the Companies Act, 2013.

3. CSR ACTIVITIES

Promotion of education especially among children and the differently abled including:

- a) Supporting schools with infrastructure like benches, toilets, potable water, fans, laptop and computers etc.
- b) Supporting schools with equipment related to science and technology Supporting children for higher education.
- c) Supporting physically and mentally challenged children for their education and food.

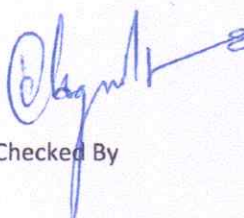
Promoting gender equality and empowering women including:

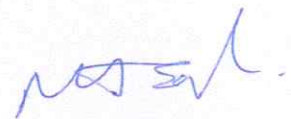
- a) Adult literacy for women.
- b) Training in vocations pursued by women.
- c) Supporting old-age homes & other facilities for senior citizens and adopting measures for reducing inequalities faced by socially and economically background groups

Rural Development:

Strengthen rural areas by improving drinking water facility, sanitation, power and livelihood, thereby creating sustainable villages.


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Promoting various sports activities

Training to promote rural sports, nationally recognized sports.

Contribution and Financial Assistance

Contribution to 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.

4. CSR COMMITTEE

CSR Committee shall be formed as per the applicable laws and the committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy. The CSR Committee shall submit periodical reports to the board of directors.

5. CSR FUND

The committee shall endeavour to spend 2% of the average net profit during the preceding 3 financial years on CSR activities as enumerated above.

6. DUTIES & RESPONSIBILITIES OF CSR COMMITTEE

- a) Formulate and recommend to the Board the CSR activities/programs to be undertaken by Indore Composite Private Limited.
- b) Recommend the Board the CSR Expenditure to be incurred on the CSR activities/programs. Institute a transparent mechanism for implementation of the CSR projects and activities.
- c) Effectively monitor the execution of the CSR activities.
- d) Prepare an annual report of the CSR activities undertaken for Indore Composite Private Limited and submit the report to the Board.

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7. RESPONSIBILITY OF THE BOARD

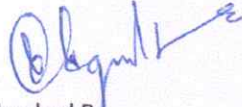
Approve the CSR Policy and the CSR Expenditure after taking into consideration the recommendations made by the CSR committee.

Ensure the CSR spending every financial year of at least 2% of average net profits made during immediately preceding 3 financial years, in pursuance with the Policy.

Ensure disclosure of the contents of the CSR Policy on the Indore Composite Private Limited website.

Preparation of annual report on the CSR in the prescribed format as per the Companies Act, 2013.


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8. CSR EXPENDITURE

In every financial year, Indore Composite Private Limited shall spend 2% of its average Net Profits in the immediately preceding three (3) financial years.

CSR Expenditure shall mean all expenditure incurred in respect of specific projects/programs relating to the approved CSR activities.

CSR Expenditure shall not include expenditure on an item not in conformity or not in line with activities which fall within the purview of the CSR activities listed in above.

The surplus arising out of the CSR activities or projects shall not form part of the business profit of Indore Composite Private Limited.

9. IMPLEMENTING CSR ACTIVITIES

The implementation and execution of the CSR activities/projects shall be carried out through the Indore Composite Private Limited CSR working committee members, headed by the CSR Committee Directors.

Indore Composite Private Limited shall undertake the CSR activities directly and through various implementing agencies such as, NGO's, non-profit organizations, etc. Such implementing agencies shall have an established track record as prescribed under the law.

Some of the initiatives taken up by Indore Composite Private Limited will facilitate the involvement of Indore Composite Private Limited employees as volunteers in ongoing CSR activities and events, giving them an opportunity to engage in socially meaningful activities, thus, enabling them to realize their full potential and role as socially responsible citizens (Employee Volunteer Programs).

The initiatives undertaken may be communicated to the employees through specific awareness campaigns, so as to enable maximum participation.

10. CSR REPORTING

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The Board in its Annual Report shall include the details of the CSR activities undertaken in the Financial Year.

The CSR Committee shall provide an annual report on the implementation and monitoring of the CSR Policy and that it is in compliance with CSR objectives of Indore Composite Private Limited, which statement shall form part of the Boards' Report.

Indore Composite Private Limited shall display on its website (www.indore.co.in) the contents of its CSR Policy and other information as may be required to be displayed.

11. AMENDMENTS

The Policy may be reviewed and amended from time to time.


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12. DISCLOSURE

All disclosures, display and reporting requirement related to CSR shall be made in accordance with the provisions of the Act and Rules made thereunder.

13. GOVERNANCE

The Company can undertake CSR activities either by itself or through other entities eligible to undertake CSR activities under Applicable Law. Accordingly, Indore Composite Private Limited or such other entity will work closely with and support the Board and the CSR Committee in carrying out the CSR activities of the Company. Indore Composite Private Limited or such other entity will assist the CSR Committee in identifying the areas of CSR activities and execution of initiatives as per defined guidelines. Indore Composite Private Limited or such other entity will also assist the Board and the CSR Committee in reporting the progress of deployed initiatives and in making appropriate disclosures (internal / external) on a periodic basis.

14. FUNDING, SELECTION AND MONITORING PROCESS

Indore Composite Private Limited will receive requests for funding of projects throughout the calendar year. The CSR committee members will evaluate proposals received under the Indore Composite Private Limited focus areas and projects will be prioritized by assessing their potential impact. Indore Composite Private Limited representatives will monitor the status of each project and will report its findings to the CSR Committee periodically to enable the Board and the Management of the Company to meet their reporting, monitoring and other legal obligations. In any year, where the Company has spent in excess of its CSR obligation, such excess spending shall be available for set off against the Company's CSR obligations for up to the next three financial years in accordance with Applicable Law, and the Board shall be competent to pass a resolution in this regard.

15. CSR ANNUAL ACTION PLAN AND LOCATION OF CSR EFFORTS

The CSR Committee shall decide on the locations for CSR activities and formulate and recommend to the Board for approval a CSR annual action plan, which shall contain all matters which are required under Applicable Law and any other matters as the CSR Committee may deem fit from time to time. The Board may modify the annual action plan as per the recommendations of the CSR Committee at any time during the financial year, based on reasonable justification.

16. IMPACT ASSESSMENT

Impact assessment shall be undertaken by the Company or by recipient or by implementing agency as required by and in the manner set out under Applicable Law, and the impact assessment report(s) shall be placed before the CSR Committee and the Board, and shall be disclosed as legally required.

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