

CSR COMMITTEE

The Board of Director has constituted the CSR Committee in its Board meeting held on 2nd September 2014 which comprising the following members

- 1. Mr. Viney Sagar Sahgal
- 2. Mr. Sridhar

CONCEPT AND VISION

The Company intends to make a positive difference to society and contribute its share towards the social cause of betterment of society and area in which companies operates. The Company also believes in the trusteeship concept. This entails transcending business interests and working towards making a meaningful difference to the society.

As a responsible corporate citizen and as part of its Endeavour towards inclusive development of society and community at large, Quality Needles Private Limited recognizes the significance of the philosophy and the concept of CSR, which will add value to the operations and contribute towards the long term sustainability of the business and eventually, enhance the interests of the stakeholders and the society.

In this regard, the Company has made this policy which encompasses the Company's philosophy for delineating its responsibility as a Corporate Citizen and lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large and titles as the "Corporate Social Responsibility (CSR) Policy" which is based as per the Companies Act, 2013 and rules made there under.

The CSR initiatives, by the Company shall give preference to the local areas, which, however, will not directly relate to (i) the business of the Company and (ii) welfare of its employees.



CSR ACTIVITY

The Company shall upon the recommendation of its CSR Committee and with necessary approval of the Board, can undertake any of the following activities, as part of its corporate social responsibility initiatives, which are defined in Schedule VII of the Companies Act 2013;

Sn	CSR Activity	Relevant clause
0		of Schedule VII
1	Eradicating extreme hunger and poverty	(i)
2	Promotion of education	(ii)
3	Ensuring environmental sustainability	(vi)
4	Employment enhancing vocational skills	(vii)
5	Contribution to the Prime Minister's National Relief Fund or any other fund	(ix)
	set up by the Central Government or the State Government for socio-	
	economic development and relief and funds for the welfare of the Scheduled	
	Castes, the Scheduled Tribes, other backward classes, minorities and women.	

MODALITIES OF EXECUTION AND IMPLEMENTATION

The modalities for execution of the CSR activities / projects / programs, implementation schedule / monitoring process of projects / programs shall be prescribed by CSR Committee from time to time.

We will strive to implement the aforesaid CSR activities on our own to the extent possible. However at the same time, we recognize need to work in partnership with other players also. This would include:

- Collaborating with various organization, which are registered as a Trust or a section 8
 company under the Companies Act, 2013 or Society or NGOs or any other form of entity
 incorporated in India that specialize in the aforesaid activities.
- Contribution to various funds which are aligned with our Vision and Mission e.g. Prime
 Minister's National Relief Fund or Any other fund set up by the Central Government for socioeconomic development and relief for the welfare of Scheduled Castes, the Scheduled Tribes,
 other Backward classes, minorities and women.



MONITORING

The administration of the CSR Policy and the execution of identified CSR Projects, Programs, and activities under it shall be carried out under the overall superintendence and guidance of the CSR committee.

CSR EXPENDITURE AND CORPUS

For each financial year, 2% of the average net profits (as defined in the Companies Act, 2013 and the applicable rules there-under) made during three immediately preceding financial years or such higher amount as may be resolved by the Board of Directors / Competent Authorities, as applicable.

The surplus arising out of the CSR Projects or programs or activities shall not form part of the business profit of the company.

SANCTIONING AUTHORITY

Managing Director would be authorized for sanctioning amount for any specific activity within the overall Ceiling Limit and / or to delegate authority from time to time to other Directors to allocate amount for any such specific activity within the overall Ceiling Limit

This policy has been formulated and recommended by the CSR Committee and adopted by the Board of Directors in its meeting held on 15th March 2015.

Upon recommendation of the CSR Committee, The Board may amend or modify this CSR Policy as and when necessary.