

CORPORATE SOCIAL RESPONSIBILITY POLICY
OF
IMP POWERS LTD.

Guiding Principle:

Corporate Social Responsibility (CSR) is the process by which an organisation thinks about and evolves its relationships with stakeholders for the common good, and demonstrates its commitment in this regard by adoption of appropriate business processes and strategies. Thus, CSR is not charity or mere donations. CSR is a way of conducting business, by which corporate entities visibly contribute to the social good. Socially responsible companies do not limit themselves to using resources to engage in activities that increase only their profits. They use CSR to integrate economic, environmental and social objectives with the company's operation and growth.

Background:

IMP Powers Ltd. ("IMP" or "the Company") over the past several years of its existence has been socially responsible and has voluntarily undertaken various Corporate Social Responsibility initiatives even when there were no legal and statutory requirements in this regard.

IMP have adopted an approach towards CSR & TRAINING that has focused on means of conducting business management, that adequately takes into account laws and regulations, social norms, safety and environmental issues, human rights and other considerations, and developing together with society sustainably and harmoniously while earning the support and trust of stakeholders, including shareholders, Customers, business partners, employees and local communities. The Company has taken up important aspects of CSR & training initiatives that has been the intentional aim of the management to help the needy in dire times and has also created the best possible protection for the animals at large.

As a part of its commitment to CSR initiatives, IMP, for the years together has undertaken the following **CSR & TRAINING initiatives as detailed hereunder :-**

1. Setting-up old age Homes and to take their complete care.
2. Tree plantation in the approach roads at our plant in Silvassa
3. Feeding the hungry on salutation days/ Festivals
4. Organize free Blood donation camps
5. Offer project trainee opportunities to unemployed youth fresh from colleges (MBA, Graduates/Post graduates, Engineers, Diploma holders, ITIs) give them training of minimum 3 to 6 months (unpaid apprentice like) and give them a certificate of completion of training.
6. Set up a GAUSHALA (Cowshed) taking complete care of the inmate cows.

The objective of this policy is to:

- Promote a unified approach to CSR to incorporate under one umbrella the diverse range of the Sector's philanthropic activities, thus enabling maximum impact of the CSR initiatives.
- Ensure an increased commitment at all levels in the organisation, to operate in an economically, socially and environmentally responsible manner while recognising the interests of all its stakeholders.

- Encourage employees to participate actively in the Company's CSR and give back to the society in an organised manner.

Scope and Applicability:

This policy shall be applicable to IMP and shall be effective from 1st April, 2014.

Policy Statement:

1. Allocation of Resources & Thrust Areas:

The CSR Committee of the Board of the Company will manage 2% of the average net profits made during the three immediately preceding financial years to undertake CSR initiatives which meet the needs of the local communities where the Company operates.

IMP may carry out the Company's CSR programmes or initiatives through the trusts namely; Shree Radhakrishna Charitable Trust, or Shree Venkatesh Seva Trust or the Bombay Gogras Bhiksha Society. The CSR Programmes/ activities/ projects which may be undertaken by those Trusts shall be in accordance with their objects, administrative and accounting processes laid down in the respective Trust Deeds/ Memorandum and Articles of Association and may include the following:

- Providing Housing facilities to the woman, children and elderly people.
- Allocation of funds for Disaster Relief/ Disaster Management.
- Promoting and providing for Girls education.
- Providing Medical and health care facilities to woman, children and old people.
- Cow/ Animal health care and welfare etc.

Our commitment to CSR will be manifested by investing resources in any of the following areas as stated under Schedule VII to the Companies Act, 2013:

- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- 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;
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining quality of soil, air and water;
- 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;
- Measures for the benefits of armed veterans, war widows and their dependents;

- Training to promoter rural sports, nationally recognised sports, Paralympics sports and Olympic sports;
- 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 Schedule Castes, the Scheduled Tribes, other backward classes, minorities and women;
- Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- Rural development projects

The Company shall give preference to the local area and area around it where it operates for spending the amounts earmarked for CSR activities.

The surplus arising out of the CSR activities will not be considered as a part of the business profits of the company.

2. Total Outlay for each financial year:

The Company in every financial year commencing from 1st April, 2014 in line with the new Companies Act 2013, pledges to spend, atleast 2% of the average net profits made during the three immediately preceding financial years specifically towards CSR initiatives.

3. Implementation:

IMP has constituted a CSR Committee of the Board consisting of 3 or more directors and wherever required with at least one CSR Committee member as an Independent Director.

The mandate of the said CSR Committee shall be:

- To formulate and recommend a CSR policy to the Board and to recommend amount of expenditure to be incurred on CSR activities;
- To monitor the CSR policy of the Company from time to time.

Upon the approval by the Board of the recommendations made by the CSR Committee, the CSR Policy shall be put up on the website of the Company and shall be disclosed in the Board's report to the Shareholders. The Board will ensure that the activities included in the CSR policy are undertaken by the Company and ensure that the Company spends, in every financial year atleast two percent of the average net profits of the Company made during three immediately preceding financial years and shall also ensure that the Company gives preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities. In case the Company fails to spend such amount, the Board's report shall specify the reasons for not spending the amount.

A formal process of approving projects that the Company will support will be put into place with each project being vetted by the CSR Committee.

The CSR Committee will convene half yearly meetings to review the progress of varied CSR projects in terms of both outcome assessment and financial monitoring.

The CSR Committee will review the strategy from time to time and may choose new focus areas and projects as and when required.

In order to ensure transparency and communication with all stakeholders, the CSR Committee will document the details of the Company's CSR initiatives and CSR expenditure and ensure that the same are available in the public domain i.e. the Directors' Report of the Company's Annual report and on the Company's website.

Further employee participation in CSR projects will be encouraged and supported.

Any modifications / changes to this Policy shall be made only with the approval of the Board of Directors of the Company on the basis of recommendation made by the CSR Committee.

**FOR IMP POWERS LTD.
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RAMNIWAS R DHOOT
CHAIRMAN**