

XOLOPAK INDIA LIMITED.

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

In accordance with the provisions of Section 135 of Companies Act, 2013, the Corporate Social Responsibility (CSR) Committee of **XOLOPAK INDIA LIMITED** (“the Company”).

Preamble:

We, at Xolopak India Limited are committed to provide innovative, high quality and planet friendly consumer products.

We also believe that we have a responsibility to give back to the communities in which we operate, and to contribute to the social and economic development of our country. As a fastest growing pioneer in manufacturing premium Biodegradable products and sustainable disposables, we are committed to upholding the highest standards of CSR and sustainability.

In line with this commitment, we are putting in place a formal CSR policy to guide our social and environmental initiatives going forward. We recognize that our CSR activities must be aligned with our core values and business objectives, and must create long-term value for our stakeholders.

We will focus our CSR efforts on areas that are critical to the well-being of our communities, including health, education, skill and community development, waste management and environmental sustainability. We will work closely with our employees, customers, and partners to identify and implement impactful CSR projects that make a positive difference in people's lives.

Our goal is to establish a sustainable business model that balances financial performance with social and environmental responsibility. We will regularly review and assess the effectiveness of our CSR policy and initiatives, and will report transparently on our progress and impact.

We are committed to creating a better future for all, and to being a responsible and ethical corporate citizen. We look forward to working together with our stakeholders to make a positive difference in the world.

Corporate office:

Reg: Office No. 202, 2nd Floor,
Seven Business Square, City Suryey No.1108/7,
Plot No.487, Bhamburda, Shivajinagar
Pune, Maharashtra, India, 411005

Contact Details:

✉ compliance@xolopak.com
☎ Phone: +91 9833560076
🌐 www.xolopak.com

GST Details:

CIN: 20131PN2017PLC172529
GST No: 23AAGCV1288A1ZN
GST No: 27AAGCV1288A1ZF

Key words and meanings:

1. "Act" shall mean the Companies Act 2013, including any modifications, amendments or re-enactment thereof.
2. "Approved Budget" shall mean the total budget as approved by the Board of the Company upon the recommendation of the CSR Committee, which is to be utilized for CSR Projects.
3. "Board" shall mean the Board of Directors of the Company.
4. "CSR Annual Plan" shall mean the annual plan detailing the CSR expenditure for the year.
5. "CSR Committee" shall mean the Corporate Social Responsibility Committee constituted by the Board of the Company in accordance with the Act.
6. "CSR Policy" shall mean the present Corporate Social Responsibility Policy of the Company, which covers the activities to be undertaken by the Company as specified in Schedule VII to the Act and the CSR Expenditure thereon.
7. "CSR Projects" or "Projects" means Corporate Social Responsibility projects/activities/ programs/ initiatives, instituted in India, either new or ongoing, and include, but is not limited to those undertaken by the Board in pursuance of recommendations of the CSR Committee as per the declared CSR.
8. "Financial Year" shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.
9. "Net profit" shall mean the net profit as per Sec 135 of the Act and Rules based on which the specific percentage for CSR expenditure has to be calculated.
10. "Rules" shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re-enactment, modifications or amendments thereof.

Policy Objectives:

The objective of the CSR Policy ("Policy") is to lay down the guiding principles in undertaking various Programs and projects by or on behalf of the company relating to Corporate Social Responsibility ("CSR") within the meaning of section 135 of the Companies Act, 2013 read with Schedule VII of the Act and the CSR Policy Rules 2014. ("Rules")

CSR Activities:

The activities that the Company may undertake shall be (inter alia):

1. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;

Corporate office:

Reg: Office No. 202, 2nd Floor,
Seven Business Square, City Survey No.11o8/7,
Plot No.487, Bhamburda, Shivajinagar
Pune, Maharashtra, India, 411005

Contact Details:

✉ compliance@xolopak.com
☎ Phone: +91 9833560076
🌐 www.xolopak.com

GST Details:

CIN: 20131PN2017PLC172529
GST No: 23AAGCV1288A1ZN
GST No: 27AAGCV1288A1ZF

2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and development of entrepreneurship, establishment of common facility centers;
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
4. 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 and effective waste management;
5. 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;
6. Measures for the benefit of armed forces veterans, war widows and their dependents;
7. Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
8. 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;
9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
10. Rural development projects.

CSR Fund

The Board shall endeavor to spend 2% of the average net profit during the preceding 3 financial years on CSR activities as mentioned above.

CSR Committee Constitution:

The Company is not required to constitute a Corporate Social Responsibility Committee as it does not fall within the purview of Section 135(1) of the Companies Act, 2013.

Corporate office:

Reg: Office No. 202, 2nd Floor,
Seven Business Square, City Survey No.11o8/7,
Plot No.487, Bhamburda, Shivajinagar
Pune, Maharashtra, India, 411005

Contact Details:

✉ compliance@xolopak.com
☎ Phone: +91 9833560076
🌐 www.xolopak.com

GST Details:

CIN: 20131PN2017PLC172529
GST No: 23AAGCV1288A1ZN
GST No: 27AAGCV1288A1ZF

As per Section 135 sub-section (9) where the amount to be spent by the Company does not exceed fifty lakh rupees, the requirement under sub-section (1) for the constitution of the Corporate Social Responsibility committee shall not be applicable and the functions of such committee shall not be applicable and the functions of such committee provided under this Section shall in such cases, be discharged by the Board of Directors of the Company.

Responsibilities of the Board:

The Board shall be responsible to form a CSR Committee (as and when gets applicable) and disclose the composition of the CSR Committee.

The Board shall approve the CSR Policy as and when required and place the same on the Company's website.

It shall ensure implementation and monitoring of the activities under CSR and expenditure of requisite amount on CSR every year pursuant to the provisions of the Act. The Board also needs to disclose the reasons for not spending the amount (if applicable) in the Annual Report to the Shareholders of the Company.

The Board shall ensure that the administrative overheads are not more than 5% of the total CSR Expenditure and the funds so disbursed have been utilized for the purposes and in the manner as approved by Board / CSR Committee and the Chief Financial Officer shall certify to the effect.

The Board shall also approve transfer of unspent CSR Amount in accordance with the law. The Accounts and Finance Team of the Company shall prepare the statement of spent and unspent CSR amounts and shall assist and facilitate for transfer of the same.

Implementing CSR Activities:

The implementation and execution of the CSR activities/projects shall be carried out by Board of directors or any other team as appointed by them.

The Board shall undertake the CSR activities directly and/or through various implementing agencies such as, NGO's, non-profit organizations, etc. Such implementing agencies shall have an established track record and in compliance with the applicable laws.

Corporate office:

Reg: Office No. 202, 2nd Floor,
Seven Business Square, City Suryey No.11o8/7,
Plot No.487, Bhamburda, Shivajinagar
Pune, Maharashtra, India, 411005

Contact Details:

✉ compliance@xolopak.com
☎ Phone: +91 9833560076
🌐 www.xolopak.com

GST Details:

CIN: 20131PN2017PLC172529
GST No: 23AAGCV1288A1ZN
GST No: 27AAGCV1288A1ZF

The Company may collaborate with other companies for undertaking the CSR projects/programs subject to fulfilment of separate reporting requirements as prescribed in the Rules.

The CSR activities may also facilitate the involvement of employees as volunteers in ongoing CSR activities and events, giving them an opportunity to engage in socially meaningful activities.

CSR Reporting:

The Board in its Annual Report shall include the details of the CSR activities undertaken in the Financial Year, on the implementation and monitoring of the CSR Policy and that it is in compliance with CSR objectives of the Company, which statement shall form part of the Boards' Report.

Confidentiality:

All deliberations of the Board of Directors and all records, material and information pertaining to the Corporation obtained by a member of the Committee shall be considered confidential. Committee members that is Board of Directors shall maintain the confidentiality of such deliberations, and shall safeguard such records, material and information from improper access.

Amendment of Policy:

The Board of the Company may, subject to compliance with applicable law, at any time alter, amend or modify the CSR Policy as it deems fit to comply with the statutory obligation of the Company to undertake the CSR Activities.

Note: The surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of a Company.

Corporate office:

Reg: Office No. 202, 2nd Floor,
Seven Business Square, City Survey No.11o8/7,
Plot No.487, Bhamburda, Shivajinagar
Pune, Maharashtra, India, 411005

Contact Details:

✉ compliance@xolopak.com
☎ Phone: +91 9833560076
🌐 www.xolopak.com

GST Details:

CIN: 20131PN2017PLC172529
GST No: 23AAGCV1288A1ZN
GST No: 27AAGCV1288A1ZF