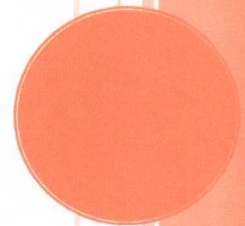


CORPORATE SOCIAL RESPONSIBILITY POLICY

ESSEM TECNOPINZ PRIVATE LIMITED

ESSEM TECNOPINZ PRIVATE LIMITED is a socially responsible corporate going beyond the legal & statutory requirements to make responsible investments in the community

30th June, 2016



CORPORATE SOCIAL RESPONSIBILITY POLICY

ESSEM TECNOPINZ PRIVATE LIMITED

ESSEM TECNOPINZ PRIVATE LIMITED (now onwards mentioned as ETPL) is a global leader in writing technology, selling its wide range of products to more than fifty countries around the world today, including to some of the world's best brands. With production facilities both in India and Thailand, we offer high quality and fully optimised tips to meet all our customer's individual needs.

ETPL embraces a philosophy of total quality management, uncompromising and relentless attention to our design and manufacturing processes, inspection procedures and customer service.

CSR Vision

As a responsible corporate citizen we are committed to highest level of corporate social responsibility. To actively contribute to the Social, Economic, Health, Education and Environmental Development of the community through sustainable measures ensuring long term benefit to society.

CSR Focus Areas

Company emphasizes on strengthening the relationship with the community by way of its association with various NGOs, charitable institutions.

Programs to be undertaken will be reviewed from time to time by the CSR Committee of the Board and specific initiatives under these will be undertaken in line with the CSR Policy in the fields as stipulated under Schedule VII of the Act.

Our commitment to CSR will be manifested by investing resources in any of the following areas -

1. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation & making available safe drinking water;
2. Promoting education, including special education and employment enhancing vocation skills especially among children, woman, elderly & the differently abled and livelihood enhancement projects;
3. Promoting gender equality, empowering women, setting up homes and hostels for women & orphans setting up old age homes, day care centres, and such other facilities for senior citizens & measures for reducing inequalities faced by socially & economically backward groups;
4. Ensuring environmental sustainability, ecological balance, protection of flora & fauna, animal welfare, agroforestry, conservation of natural resources & maintaining quality of soil, air & water;

5. Protection of national heritage, art & culture including restoration of buildings & sites of historical importance & works of art; setting up of public libraries; promotion & development of traditional arts & handicrafts;
6. Measures for the benefit of armed forces veterans, war widows & their dependents;
7. Training to promote rural sports, nationally recognized sports, paralympic sports & 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 & relief & welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities & 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 Funds

In line with the new Companies Act 2013 (the Act), ETPL pledges to contribute at least 2% of the average net profits of the Company made during the 3 immediately preceding financial years specifically towards CSR initiatives.

For this purpose, the net profit and average net profit shall be calculated in accordance with the provisions of section 198 of the Act read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

The corpus for the purpose of carrying on the aforesaid activities would include the followings:

- 2% of the average Net Profit made by the Company during immediately preceding three Financial Years.
- any income arising there from.
- surplus arising out of CSR activities carried out by the company and such surplus will not be part of business profit of the company

CSR Implementation

We will strive to implement the aforesaid CSR activities on our own to the extent possible. However, the principle implementer of our CSR activities would continue to be our foundation MAHANSARIA JANKALYAN KOSH (a registered Trust). At the same time, we recognize need to work in partnership with other organizations also.

This would include:

1. 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 specializes in the aforesaid activities.
2. Contribution to various funds which are aligned with our Vision and Mission e.g.
 - Prime Minister's National Relief Fund

- Any other fund set up by the Central Government for :
 - socio-economic development and relief.
 - for the welfare of Scheduled Castes, the Scheduled Tribes, other Backward classes, minorities and women.

3. Collaborating or pooling resources with other companies to undertake aforesaid CSR activities.

CSR Committee Composition

The board of directors of the company has formed the CSR committee in their meeting held on **30/06/2016** for the financial year 16-17 and CSR Committee of the Board currently comprises of following members:

Name of Director	Designation
Sandip Kumar Shyam Sundar Mahansaria	Chairman of CSR Committee
Deepak Ramchand Vasandani	Member of CSR committee.
Amit Vinod Tibrewal	Member of CSR committee.

Access to Management and Independent Advisors

Committee members will have full access to management of the Company to discuss any matter which the member may wish to discuss or obtain additional information on CSR projects and Programs etc.

The Committee has the authority to retain, set the terms of and compensate independent legal, advisors, consultants or experts that it determines necessary to assist it in carrying out its duties.

Responsibilities / Duties of the Committee Members

The Committee is responsible for overseeing the establishment and implementation of corporate social responsibility policies and practices and for monitoring the Company's performance against such policies and practices as well as applicable laws and regulations. The Committee's duties with respect to corporate social responsibility matters shall include:

- Reviewing and making recommendations, as appropriate, in regard to the Company's corporate social responsibility policies;
- Developing a CSR Strategy- Liaising with management on the Company's corporate social responsibility program,;
- Scheduling regular reports from management on the Company's corporate social responsibility performance to assess the effectiveness of the corporate social responsibility program;
- Reviewing the annual budget for the Company's corporate social responsibility activities to confirm that sufficient funding is provided for compliance and

- Reviewing the Company's corporate social responsibility performance to assess the effectiveness of the Company's corporate social responsibility program and to determine whether the Company is taking all appropriate action in respect of those matters and has been duly diligent in carrying out its responsibilities and to make recommendations for improvement, where appropriate.
- The Committee will report regularly to the Board following meetings of the Committee with respect to such matters as are relevant to the Committee's discharge of its responsibility.
- The Committee will review and update, on an annual basis, a work plan for the ensuing year for the Committee to ensure that Committee fulfills its responsibilities on a timely basis.

The Board has developed the following specific expectations of Committee members to promote the discharge by the Committee members of their responsibilities and to promote the proper conduct of the Committee:

i. Prepare for Meetings - Committee members are expected to prepare for each meeting, Committee members are to circulate agenda for meeting at least 7 days in advance prior to meetings.

ii. Attend Meetings - Committee members are expected to maintain a high attendance record at meetings of the Committee. Attendance by audio - visual conference may be used to facilitate a Committee member's attendance.

Meeting

The Committee must meet at least 2 times in a Year at appropriate intervals. Additional meetings may be called upon serving of proper notice at any time to address specific needs of the Company. A Committee meeting may be called by the Committee Chairman, or any Committee member. The meeting must be held within business hours on a day which is not a public holiday.

Where any meeting of the Committee adjourns due to any reason the same shall stand adjourned till the next week at the same time and place on a day which is not a national holiday.

The extracts of the meeting must be recorded in the Minutes and shall be signed and confirm by next meeting by the Chairman of the meeting or where such chairman cease to be chairman or committee member then by Chairman of the next meeting.

Agenda and Notice

Notice of the time and place of each meeting of the Committee must be served to each Committee member either by personal delivery, electronic mail, facsimile or other electronic means by not less than 7 clear days before the date of the meeting. However, whenever necessary Committee meetings may be held at any time at a shorter notice if all of the Committee members consent to hold meeting at a shorter notice or in case of urgency without serving upon notice where a Committee member participating in a Committee

meeting is deemed to have waived notice of the meeting. The practice of the Committee is to provide notice of meetings to all directors in order that they may attend the meeting.

The Chairman of the Committee shall establish the agenda for each Committee meeting. The agenda of the business to be transacted at meeting shall be distributed to Committee members along with Notice. Each Committee member is free to request the inclusion of other agenda items.

Quorum and Attendance

A quorum for any Committee meeting shall be one-third of its total strength or two members, whichever is higher. A Committee member who is unable to attend a Committee meeting in person may participate by telephone or teleconference or by video Conference but for the purpose of quorum only attendance through video conference will be counted

CSR Budget and Expenditure

CSR expenditure shall include all expenditure including contribution to corpus, or on projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Companies Act 2013.

The Board of the Company shall ensure that the company spends on CSR Activities as specified by Committee, in every financial year, at least two per cent of the average net profits of the company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy. Any Surplus arising out of CSR activities and any income arising there from shall also be used for CSR activity in line with the guidelines laid by the committee.

The overall amount to be committed to CSR will be approved by the Board as part of the Company's overall Annual Budget / Plan. Within the budgeted amount, specific CSR initiatives/projects will be approved in line with the process approved by the CSR Committee of the Board. All projects undertaken by the Company will be approved / ratified by the Company's CSR Committee.

Monitoring

The CSR Committee will ensure a transparent monitoring mechanism for ensuring effective implementation of the projects / programs/ activities proposed to be undertaken.

The Company's CSR activities will be reviewed by the CSR Committee. A system will be put in place to maintain a transparent monitoring and reporting mechanism across all the stakeholders involved in the CSR activities of the company, as desired by the CSR Rules (Section 135, Companies Act, 2013).

Reporting

Significant CSR activities and achievements will be reported as part of the Director's Report in the Company's Annual Report and also as per any other statutory and regulatory reporting requirements.

Restrictions over CSR Programs/Projects

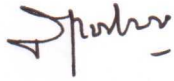
1. The company will ensure that its CSR projects are non discriminatory in nature and do not have any restrictive political or religious affiliations.
2. Contribution of any amount directly or indirectly to any political party shall not be considered as CSR activity
3. The programs/ projects will be within the areas recommended / listed by the CSR Committee and mentioned in the Policy.
4. The programs/ projects will be beyond business as usual.
5. The programs/projects will be implemented within the country and preferably in areas where the company has its presence.
6. Programs/Projects should not be exclusively for the benefit of employees of the company or their family members or those that are conducted /undertaken exclusively in pursuance of the normal course of business.
7. Mere funding or financing the programme for implementation of CSR activities shall not be considered as CSR activities
8. Any surplus, generated out of the CSR activities of the Company, will be ploughed back to the CSR Initiatives of the Company and shall not form part of business profit of company.

Effective Date

This policy is effective from 30th June, 2016.

For and on behalf of the Board of Directors

M/s ESSEM TECNOPINZ PRIVATE LIMITED



Deepak Ramchand Vasandani
Director
DIN: 00192961
'Smaran', 46, Palm Spring,,
Near Anand Wali, Gangapur Road,,
Nasik, 422013



Amit Vinod Tibrewal
Director
DIN: 00191673
B-11, Priyanka Hills Apartment,
Mahatma Nagar, Nasik, 422007,

Date: 30/06/2016

Place: Nashik