

WINGS AUTOMOBILE PRODUCTS PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)

1. PREFACE

Section 135 of the Companies Act, 2013 (“the Act”), read with Companies (Corporate Social Responsibilities) Rules, 2014, mandates a Company to establish a Corporate Social Responsibility Policy for the matters specified under the Schedule VII of the Act.

2. OUR BELIEF

To actively contribute to the social and economic development of the communities in which we operate by building a better, sustainable way of life for the weaker sections of society and raise the country's human development index. We firmly believe that the benefits from a business must trickle down to the society for any economic development to be sustainable and meaningful. For Wings Automobile Products Private Limited (Wings), being a good corporate citizen and doing responsible business is very important and above everything.

3. OBJECTIVE OF THE POLICY

The objective of this policy is to empower the underprivileged children’s and marginalized sections of society by facilitating quality education, espousing social causes, sustainable livelihood and access to alternative livelihood opportunities in order to bring about a long term, sustainable impact on the life of people and the community. The primary object of the policy is to focus on Education, Health care, skill development and financial inclusion inter alia includes:

- (a) Promote education with active involvement in teaching and creating learning environment.
- (b) Facilitate awareness campaign related to health and hygiene of people and to provide help in other life threatening diseases.
- (c) Reach out to masses with real intervention in the fields of women empowerment, gender equality and senior citizen care.
- (d) Reducing child mortality and improving maternal health.
- (e) Support youth/ students in employment enhancing vocational skills and to nurture real empathetic leaders.

- (f) Eradication of hunger and poverty.
- (g) To undertake other CSR activity as prescribed in the 'Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended upto date.

4. DEFINITIONS:

- 4.1 "Act" means the Companies Act, 2013
- 4.2 "Activities" means the CSR activities of the Company
- 4.3 "Board" means the Board of Directors of the Company
- 4.4 "Company" means Wings Automobile Products Private Limited and all its offices
- 4.5 "Committee" means Corporate Social Responsibility Committee established under the Companies Act, 2013

5. CORPORATE SOCIAL RESPONSIBILITY COMMITTEE:

The Committee will be comprised of following directors:

- (a) Mr. Rohit Bhalla (Chairman)
- (b) Mrs. Madhu Bhalla (Member)

6. INSTITUTIONAL SET UP

The Company is already carrying its CSR activities in the past through nonprofit organizations established to promote the social welfare having the activities in line with the objects of this policy or through contribution in Prime Minister's relief fund, for the benefit of the society. Therefore, CSR Activities of the Company shall be carried on similar lines on periodic basis, considering the funds allocated by the board from time to time on the recommendation of the committee. The activities of the non-profit organizations will be reviewed by the Committee on quarterly/half yearly basis and which shall submit a report to the Board on the same accordingly.

7. ACTIVITIES

Subject to the provisions of the Act and rules made thereunder, as amended from time to time, the board of directors, considering the objects of the Company, shall carry out various CSR activities recommended by the Committee from time to time.

8. MONITORING AND EVALUATION

Committee shall on quarterly/half yearly basis review CSR activities of the Company and impact of the CSR activities shall be quantified to the extent possible. The committee shall submit a progress review report on the same to Board of the Company. The Board may, if consider necessary, get the evaluation of CSR activities of the Company from external agencies, for having the required inputs and feedbacks of the CSR activities of the Company.

9. ALLOCATION OF FUNDS

- (a) The Company may every year allocate the funds as required under the provisions of the Act and rules made thereunder or any other sums as may be provided under the various enactments, as applicable to the Company, from time to time, be allocated towards the CSR Activities, subject to the approval of Board of the Company.
- (b) The Company may voluntarily earmark funds for the CSR activities, as may be approved, by the board from time to time.
- (c) The allocation of funds may vary depending on the profits and on the need of the society, and will be decided by the board every year.
- (d) Subject to the clause 9(a), 9(b) and 9(c), the amount earmarked for the CSR activities shall be utilized by the CSR Committee as specified in clause 3 of the policy.

10. REPORTING

The contents of this policy shall be disclosed in the report of Board and shall be displayed on the Company website wingsauto.com along with other information as required under the Act and rules made thereunder.

11. PROHIBITED ACTIVITIES UNDER CORPORATE SOCIAL RESPONSIBILITY

- (a) The activities undertaken outside India.
- (b) The amount spent on activities for the benefit of the employees of the Company and their family.
- (c) Any contribution made to political party shall not be considered as expenditure for the aforesaid purpose.