

## CORPORATE SOCIAL RESPONSIBILITY POLICY

### INTERPRETATIONS

- (a) "Act" means The Companies Act, 2013 as amended from time to time.
- (b) "Board" means the Board of Directors of the Company.
- (c) "Rules" means The Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time-to-time

#### 1. Policy

The Company is committed to the following:-

1. To synergise the long-term value creation for the shareholders with creation of societal capital for seamless integration of the enterprise with the society at large.
2. To integrate CSR programmes with the Company's business and endeavour to implement the Social Investments/CSR programmes in the vicinity of the Company's operations.
3. To integrates economic progress, social responsibility and environmental concerns (Triple Bottom Line accountability) with the objective of improving quality of life.
4. To ensure inclusive and sustainable socio-economic development of the underprivileged/needful/deserving communities through the means of primary and higher education, eradication of poverty, elimination of hunger, supporting research & development work in the field of cancer, eye care, building of medical-care capacity, rural development projects and such other initiatives.
5. To support and promote the cause of all kind of sports and physical health education.
6. To promote the cause of environmental sustainability, ecological balance, protection of flora & fauna, animal welfare, agroforestry, conservation of forest & natural resources, maintaining quality of soil, air and water.
7. To promote gender equality, empowering of women economically and such other initiatives.
8. To encourage the development of human capital through skills development, vocational training etc. and contribute to the happiness index of the community by promoting livelihood enhancement projects.
9. To contribute for the promotion and accomplishment of the aforesaid causes through collaborative partnership with the Government, the District Authorities, the village panchayats, NGOs etc. including contributions to Prime Minister Relief Fund or any other fund setup by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, Scheduled Tribes, other backward classes, minorities and women.

The Company may also collaborate with other companies, including Group Companies, Subsidiaries, Associates, affiliates etc. for undertaking CSR Projects/ programs. However, the same should be undertaken in such a manner that the CSR Committees of respective companies are in a position to report separately on such projects or programs.

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

## 2. Focus Areas

Education  
Health care and family welfare  
Sports & Culture  
Social causes  
Infrastructure development  
Sustainable livelihood  
Environment  
Women Empowerment

However, all other areas as may be notified by the Central Government from time to time and as included in Schedule VII to the Act may also be taken up.

Further, the CSR activities may be undertaken by the Company itself or through-

- (a) a Company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the Company, either singly or along with any other Company; or
- (b) a Company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- (c) any entity established under an Act of Parliament or a State legislature; or
- (d) a Company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

## 3. Partners

Trusts, NGO, Govt. Agencies, other agencies /entities/beneficiaries as allowed by the Government.

## **CSR COMMITTEE**

CSR Committee shall consist of at least 3 (three) Directors, out of which at least one Director shall be an Independent Director.

## **MEETING OF COMMITTEE**

The Committee shall meet at least once in a year, preferably at the beginning of the financial year, to formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely :

- a) the list of CSR projects or programmes that are approved to be undertaken in areas or subject specified in Schedule VII of the Act;
- b) the manner of execution of such projects or programmes;
- c) the modalities of utilization of funds and implementation schedules for the projects or programmes;
- d) monitoring and reporting mechanism for the projects or programmes; and
- e) details of need and impact assessment, if any, for the projects undertaken by the Company.

However, the Board of Directors of the Company may alter such plan at any time during the financial year, as per the recommendations of the CSR Committee, based on the reasonable justification to that effect.

Apart from the above, the Committee shall hold meetings as and when necessary.

#### **MONITORING OF CSR PROGRAMS**

- a) The Board shall be responsible for day-to-day management of CSR related activities of the Company. The Board shall periodically review regarding the financial and programmatic progress of CSR projects. All projects undertaken by the Company shall be monitored on a regular basis.
- b) The Board shall be empowered to appoint an external third party to monitor / review / audit the progress (financial and programmatic) of any CSR projects, if required.
- c) The Committee will appoint an independent agency / firm of repute for carrying out impact assessment, if applicable, and the report of such impact assessment shall be placed before the Board and shall also be annexed with the Annual Report on CSR.

#### **AMENDMENTS TO THE CSR POLICY**

CSR Policy may be updated to align it with the changing requirement or changes in the legal and regulatory framework. Any revision in the Policy shall be approved by the Board of Directors.

#### **COMPOSITION OF CSR COMMITTEE**

The CSR Committee of the Company is duly constituted as per the provisions of the Companies Act, 2013.

**For additional information, please visit <https://www.csr.kctgroup.com/>.**