KKB PROJECTS PRIVATE LIMITED

(CIN: U45201GJ2007PTC050727)
Reg. Office: "Sudharma" KKB House, PL-76, Shantiniketan Co-Op HSG Society,
Sumul Dairy Road, Katargam, A.K. Road, Surat-395008, Gujarat,Ph.No.: 0261-2491690,
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CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

The Company's ("KKB Projects Private Limited") Corporate Social Responsibility ("CSR") Policy define its responsibility as a social corporate citizen and lays down the guidelines and mechanism for undertaking socially useful activities for welfare & sustainable development of the underprivileged group of community.

Objectives:

The main objective of CSR policy is to lay down guidelines for the company to make CSR a key business process for sustainable development for the society. It aims at supplementing the role of the government in actively contributing to the social and economic development of the communities in which we operate. The Company will act as a good Corporate Citizen.

Activities:

The Company may undertake various CSR projects, programs and activities from time to time. The Company may also contribute towards any existing or ongoing CSR projects, programs and activities. Such projects, programs and activities will be undertaken keeping in mind the permissible activities under the Companies Act, 2013 and rules (as amended from time to time). It shall at the discretion of the Company to undertake, modify, implement and cancel CSR projects, programs and activities from time to time as it deems fit.

The Company may from time to time undertake any project, program and activity on one or more of the following areas. This list is indicative only and not exhaustive:

- Promoting awareness of preventive health care through various activities including organizing campaigns, awareness sessions, events, marathons, etc. with reference to various ailments such as diabetes, hypertension, cardiac, etc.
- Promoting education, including special education through various activities including organizing schools development projects/programs etc.
- Promoting education through various activities including providing support to educational institutions, centers for non-formal education etc.
- Employment enhancing vocation skills through various activities like livelihood enhancement projects, vocational training programs, etc.
- Promoting gender equality and thus empowering women.
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna and animal welfare.
- Training to promote rural sports, nationally recognized sports, Paralympic sports as well as Olympic sports.
- Protection of national heritage and promotion of arts and culture.
- Rural development projects.
- Contributions or funds provided to technology incubators located within academic institutions which are approved by the central government.

- Contributions to the Prime Minister's National Relief Fund or any other fund set up by the Central Government as part of a project approved by the directors for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.
- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.
- Any other projects, programs and activities falling under the Schedule VII as amended from time to time under Companies Act, 2013, rules made thereunder, any circular / notification/ guidelines /clarification issued thereunder.

Mode of carrying out CSR activities

The Company may carry out the CSR activities either on its own, or through a registered trust or Registered society or through a company registered under Section 8 of the Companies Act, 2013 or through one or more of the modes in such manner as it deems fit. The Company may also collaborate with other companies for undertaking projects, programs and activities in such manner as it deems fit.

CSR Committee

As the amount to be spent by the Company does not exceed Rs. 50.00 (Rupees Fifty Lakh), the Company is not required to constitute CSR Committee pursuant to Section 135(9) of the Companies Act, 2013. Accordingly, the functions of such Committee provided under Section 135(1) of Companies Act, 2013 shall be discharged by the Board of Directors of the Company.

However, the Board of Directors of the Company shall constitute a committee called the "Corporate Social Responsibility Committee ("CSR Committee") in accordance with the provisions of Companies Act, 2013 and rules made thereunder. The CSR Committee will consist of 2 Directors of the Company. The Board of Directors may change the composition of the CSR Committee from time to time in such manner as it thinks fit.

Subject to the provisions of Companies Act, 2013 and rules made thereunder, the CSR Committee may meet at such intervals, in such manner and may carry out matters in such manner and function generally as per such guidelines as it deems fit.

CSR Spending

The Company may, in every financial year, spend such amounts on its CSR Activities as may be required under the Act and Rules made thereunder. The CSR Committee may authorize actual spend from time to time subject to the limits as approved by the Board of Directors.

Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Provided also that if the Company spends an amount in excess of the requirements provided under the Act and Rules, the Company may set off such excess amount against amount required to be spend under the Companies Act and Rules made thereunder, up to immediate succeeding three financial years subject to the conditions that –

(i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of this rule.

(ii) the Board of the Company shall pass a resolution to that effect.

Further, If there is any amount remaining unspent pursuant to any ongoing project, fulfilling such conditions as may be prescribed, undertaken by a Company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the Company within a period of thirty days from the end of the financial year to a special account to be opened by the Company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the Company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

In case Company fails to spend such amount, the Board shall specify the reasons for not spending the amount in the Directors Report.

Monitoring Process

In the absence of CSR Committee, the Board of Directors of the Company shall monitor the implementation of various programs, projects and activities in such manner as it deems fit. However, After Constitution of CSR Committee, the CSR Committee shall monitor the implementation of various programs, projects and activities in such manner as it deems fit. CSR Committee shall ensure that a transparent monitoring mechanism is put in place. The Committee shall submit periodical reports to the Board about the ongoing projects and achievements through the CSR activities.

Reporting

The Board of Directors shall ensure that the activities as are included in this CSR Policy are undertaken by the Company and that the Company spends two per cent of the average net profits as stipulated, in pursuance of this CSR Policy giving preference to the local area and the national capital region. The Board shall provide an Annual Report on the CSR Activities in the prescribed format.

Modifications

The Modifications to the CSR Policy may be made by the CSR Committee which shall be approved by the Board of Directors before effecting the modifications.

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CSR ANNUAL ACTION PLAN

List of CSR Projects or Programmes to be undertaken in areas or subject as per Schedule VII of the Companies Act	Manner of execution of such projects or programmes	Modalities of utilisation of funds and Implementation schedules for the projects or programmes	Monitoring and reporting mechanism for the projects or programmes	Details of need and impact-assess-ment
1. Eradicating hunger, poverty, promoting Preventive health care. 2. Promoting education & employment amongst children, women, particularly of under privileged societies etc. 3. Promoting — gender equality, women Empowerment, homes or hostels for women, orphans, senior citizens for socially and economically backward groups. 4. Environmental sustainability. 5. Protection of national heritage. 6. Measures for the benefit of armed forces veterans, war widows and _ their dependents. 7. Promotion of sports activities. 8. Contribution to PM Fund or Central Govt. fund for welfare of the schedule caste, tribes, other backward classes, minorities and women. 9. Contribution to various Research & Development projects. 10. Promoting for Rural & Slum area development. 11. Contribution towards Disaster Management. 12. Any other projects / Programmes in areas as may be notified by Ministry of Corporate Affairs, from time to time.	Through Implementing Agency or through in-house process wherever possible	As per the procedure decided by the Board of Directors.	By yearly Utilisation Certificate / By obtaining Annual Report of Implementing Agency/ies on The Project/ Programmes undertaken during the	NIL