

"KCL CORPORATE SOCIAL RESPONSIBILITY POLICY"

1. CONTEXT

The concept of Corporate Social Responsibility (“**CSR**”) has gained prominence from all avenues. It is strongly connected with the principles of Sustainability. An organization should make decisions based not only on financial factors, but also on the social and environmental consequences. Therefore, it is the core corporate responsibility of KCL LIMITED, (Formerly Khemka Containers Limited) to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

KCL, recognizes that its business activities have wide impact on the societies in which it operates and thus through its CSR Initiative aims to deliver superior and sustainable values to its stakeholders, business partners, employees and community. The Company CSR Initiative focuses on the holistic development of community and to create social, environmental and economic value to the society.

COMPOSITION OF CSR COMMITTEE:

The CSR Committee shall consist of the following directors:-

Present Composition of Committee is as follows:

- (i) Mr. Rajeev Khemka, Chairman
- (ii) Mr. Sanjeev Khemka, Member
- (iii) Mr. Sunil Bansal, Member & Independent Director

2. RESPONSIBILITIES OF THE COMMITTEE

The responsibilities of the CSR Committee include:

1. Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken
2. Reviewing “social, political, economic and environmental trends that may have a significant impact on the Company’s business activities and performance.”
3. Reviewing and evaluating “management’s goals, initiatives and practices for Social Responsibility” and “recommending goals, initiatives and practices for Social Responsibility to the Board of Directors.
4. Recommending the amount of expenditure for the CSR activities, and
5. Monitoring CSR activities from time to time.

3. FOCUS AREAS

In accordance with the requirements under the Companies Act, 2013, CSR activities, amongst others, will focus on:

1. **HUNGER, POVERTY, MALNUTRITION AND HEALTH:** Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.
2. **EDUCATION:** Promoting education, including special education and employment-enhancing vocational skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies.
3. **RURAL DEVELOPMENT PROJECTS:** Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.
4. **ENVIRONMENTAL SUSTAINABILITY:** Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water.

The CSR activities/programmes to be undertaken shall be as per Schedule VII of the Companies Act, 2013.

4. **OBJECTIVE**

KCL CSR Policy intends to:

- a) Strive for economic development that positively impacts the society at large with minimal resource footprint.
- b) Embrace responsibility for the Company's actions and encourage a positive impact through its activities on hunger, poverty, malnutrition, environment, communities, stakeholders and the society.

5. **UNDERTAKING CSR ACTIVITIES:**

KCL will undertake its CSR activities, approved by the CSR Committee, through the "**KHEMKA CHARITABLE TRUST**" as approved by the CSR Committee.

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

6. **LOCATION OF CSR EFFORTS**

The CSR committee will decide on the locations for CSR activities.

7. GOVERNANCE

The Company through a registered trust or a registered society can undertake CSR activities as per the provisions of the Companies Act, 2013. Accordingly, Trust or Society will work closely with and support the Board and the CSR

Committee in implementing CSR activities of the Company. Trust or Society will assist the CSR Committee in identifying the areas of CSR activities, programs and execution of initiatives as per defined guidelines. Trust or Society will also assist the Board and the CSR Committee in reporting the progress of deployed initiatives and in making appropriate disclosures (internal/external) on a periodic basis.

8. CSR EXPENDITURE

CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Plan. Moreover, any surplus arising from any CSR Programmes shall be used for CSR. Accordingly, any income arising from CSR Programmes will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.