

Corporate Social Responsibility Policy “K” LINE (INDIA) PRIVATE LIMITED

Definitions

Act	Companies Act, 2013, as amended and modified from time to time;
Areas of Interest	the areas of interest as identified by The Company for implementing CSR goals and shall include the areas specified in Schedule VII of the Companies Act, 2013 and shall include all CSR Activities as defined under the Act and CSR Rules from time to time;
Board	Board of Directors of the Company;
CSR	Corporate Social Responsibility;
CSR Activities	shall mean the activities to be undertaken by the Company as specified in Schedule VII of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as “CSR Rules”);
CSR Committee	the committee of the Board constituted to implement, supervise and manage the CSR initiatives of The Company in accordance with the CSR Committee Charter and the provisions of the Act and CSR Rules;
CSR Commitment	shall mean at least 2% of the average net profits of The Company made during the three immediately preceding financial years as described in this CSR Policy for conducting its CSR activities in accordance with the Act and CSR Rules;
CSR Policy	this CSR Policy of The Company (“K” Line (India) Private Limited);
CSR Proposals	shall have the meaning ascribed to the term of this CSR Policy which shall be in accordance with the Act and CSR Rules;
CSR Rules	the Companies (Corporate Social Responsibility) Rules, 2014, as amended and modified from time to time;
Employees	Employees of the Company;
Funding	shall mean the disbursements that are to be made to an Organization pursuant to this CSR Policy, with the prior approval of the CSR Committee and the Board in accordance with the Act and Rules;
Net Profit	shall have the meaning ascribed to it in the CSR Rules;
Organizations	Such organizations including NGOs as are permitted to receive Funding in accordance with the Act and CSR Rules;
The Company	“K” Line (India) Private Limited;

(A) PURPOSE

This CSR Policy establishes the scope, CSR goals of The Company and Funding approval process. This CSR Policy shall operate as the corporate responsibility policy of The Company for the purposes of Section 135 of the Act and CSR Rules.

(B) AIMS AND OBJECTIVES

The Company aims to create educated, healthy, sustainable and culturally vibrant communities. The main objective of the CSR policy is to lay down guidelines to ensure that its CSR spend results in a positive contribution to the society.

(1) Areas of Interest:

(a) Areas of Interest that The Company may undertake under the ambit of CSR are listed below:

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- (ii) Promoting education, including special education and employment enhancing vocational skills especially among children, women and the differently abled and livelihood enhancement projects;
- (iii) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; day care centers and such other facilities and measures for reducing inequalities faced by socially and economically backward groups;
- (iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
- (v) protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- (vii) training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports;
- (viii) Contributions to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;

- (ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);

- (x) Rural development projects;
 (xi) slum area development;
 (xii) disaster management, including relief, rehabilitation and reconstruction activities.
 (xiii) The Company may contribute to other areas of interest as permitted under Schedule VII of the Act.

Explanation. - For the purposes of this item, the term `slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.]

- (b) The Company may update the above list as per Section 135 and Schedule VII of the Act as amended from time to time.

- (d) The Company will publish the list of specific projects / programs it plans to undertake for any financial year, and the modalities of execution, including implementation plan will be published as per the provisions of the Companies Act, 2013 and the CSR Rules from time to time.

(C) COMPOSITION OF CSR COMMITTEE

- (1) The CSR policy and programs of The Company shall be appointed by, implemented, managed and supervised by the CSR Committee of the Board.
- (2) The Charter of the CSR Committee shall be approved by the Board and the CSR Committee shall comprise of 3 (three) Members of the Board. Subject to the requirements of the Act, the Board may increase or decrease the size of the CSR Committee by passing a resolution.
- (3) The current members of the CSR Committee shall be the following:

Name	Designation
Mr. Kenichiro Matsui	Director
Mr. Dhruv K. Kotak	Director
Capt. Rajeev Mittal	Managing Director

- (4) Invitees to the CSR Committee: The CSR Committee may, at its discretion, invite employees of The Company from time to time to participate in the meetings of the CSR Committee and assist the CSR Committee in the implementation of the CSR Policy. Invitees to the CSR Committee meetings shall be entitled to participate in the deliberations of the CSR Committee but will not be entitled to vote at the meetings of the CSR Committee.

(D) DUTIES AND RESPONSIBILITIES

Following are the Powers of the Committee:

- Formulate CSR Policy & recommend the same to the Board of Directors of the Company for approval
- Disclose the contents of such policy on the website in the manner prescribed under the Act.
- Recommend CSR activities to the Board as stated under Schedule VII of the act
- Recommend the CSR budget
- Review the various proposals and identify the eligible entities/agencies for allocation of CSR amount
- Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules.
- Monitor and review periodically the CSR activities and submit the reports to the Board in respect of the CSR activities undertaken by the Company
- Monitor the CSR Policy from time to time
- Authorize senior executives of the Company or the experts to attend the CSR Committee meeting and liaise with the identified entities/ agencies for the purpose of carrying out the CSR activities.
- Authorized to approve any modification to the CSR Plan or to propose any new program during the financial year

(E) MEETING OF THE CSR COMMITTEES

- (1) The CSR Committee shall meet as frequently as it determines necessary but at least twice annually.
- (2) The CSR Committee shall maintain minutes of each of its meetings.
- (3) The CSR Committee shall review proposed projects and make recommendations to the Board for approval of such projects and allocation of Funding in accordance with the CSR Committee charter.
- (4) The final decision with regards to the acceptance or rejection of a CSR Proposal shall be with the Board.

(F) ANNUAL ACTION PLAN:

The **CSR Committee** shall 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 subjects specified in Schedule VII of the Act;
- (b) the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4;
- (c) the modalities of utilisation 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:

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

(G) IMPLEMENTATION

The CSR Committee may identify external organizations and / or entities to assist with the various aspects of implementation of this policy including but not limited to identifying Organizations, obtaining CSR Proposals, conducting due diligence of Organizations etc. from time to time as approved by the CSR Committee and the Board. The CSR Committee shall institute a transparent monitoring mechanism for implementation of the CSR activities or programs undertaken by The Company.

(H) REPORTING MECHANISM

The Company shall publish its annual report on CSR Activities in its Directors Report in the manner prescribed under the Companies Act 2013 and the CSR Rules. This policy will also be available on The Company's website.

