



CORPORATE SOCIAL RESPONSIBILITY POLICY



KLJ DEVELOPERS PRIVATE LIMITED
REGD. OFFICE: KLJ HOUSE 8A, 5th FLOOR, SHIVAJI MARG,
NAJAFGRAH ROAD, NEW DELHI- 110015
CIN: U45201DL2006PTC145296



1. INTRODUCTION

Corporate Social Responsibility (“CSR”) is the commitment of business to contribute for sustainable economic development by working with the employees, local community and society at large to improve their lives in ways that are good for business and development. It is the contribution of the corporate sector for philanthropic causes like education, health, water, environment and community welfare. The Corporate Social Responsibility (CSR) Policy of the *KLJ Developers Private Limited* is aligned with its overall commitment to maintaining the highest standards of business performance. We recognize that our business activities have direct and indirect impact on the society. The Company strives to integrate its business values and operations in an ethical and transparent manner to demonstrate its commitment to sustainable development and to meet the interests of its stakeholders.

2. CSR VISION

The Company believes in a philosophy of adopting sustainable business practices which are beneficial to the various stakeholders including the society. Through its corporate values, the Company constantly endeavors to actively contribute to the social and economic development of the communities in which it operates. *KLJ Developers Private Limited* has always believed in giving back to the society and recognized its role and responsibility as a corporate citizen. Thus the Company endeavors to improve the quality of life of communities living in the areas it operates. The Company entails having business policies that are ethical, equitable, environmentally conscious, gender sensitive, and sensitive towards the differently abled.

3. CSR MISSION

The Company through its CSR initiatives will continue to enhance value creation in the society and in the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth for the society and community. The Company strives towards becoming a socially responsible corporate entity with a thrust on Community development through sustained business conduct. The Company is committed to ensuring socio-economic development of the community through different participatory and need- based initiatives in the best interest of the poor and deprived sections of the society so as to help them to become self-reliant and build a better tomorrow for themselves.

4. CSR POLICY

4.1 Objective

The purpose of this policy is to articulate what CSR means to the Company, kind of projects to be undertaken, identifying broad areas of interests, approach to be adopted to achieve the CSR goals and monitoring mechanism. The framework enables to put in place policies and practices in line with this policy. This document is an attempt to showcase the linkage of our social objectives with business strategy.



4.2 Applicability

The CSR policy has been developed in consonance with Section 135 of the Companies Act, 2013 (herein after referred to as “the Act”) on CSR and in accordance with the CSR rules (herein after referred to as “the Rules”) as amended from time to time notified by the Ministry of Corporate Affairs. The Policy shall apply to all CSR projects/ programmes undertaken by the Company in India as per Schedule VII of the Act.

4.3 CSR Focus Areas

In Line with the Company’s vision, values and mission, the Board of Directors have identified the following core area for CSR.

- Promoting Health care including Preventive Health care and Sanitation through awareness programmes, health check-ups, provision of medicine & treatment facilities, providing pre natal & post natal healthcare facilities, prevention of female foeticide through awareness creation, program for preventing diseases and building immunity, combating HIV, Malaria & other diseases and provision of crèche.
- Health & Environmental awareness programs in local schools and villages.
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.

However, the Company may take up any one or more activities as specified in Schedule VII of the Act notwithstanding the activities specified above and may exclusively focus on the specified CSR activities as provided above, subject to the availability of sufficient funds earmarked for CSR activities.

Also during the years, the company may collaborate with other companies or implementing agencies, registered with Ministry of Corporate Affairs for undertaking projects or programs or CSR activities in accordance with Companies (CSR Policy) Rules, 2014, as amended.

4.4 CSR Corpus/Funds

The CSR corpus for the purpose of carrying on the aforesaid activities shall be 2% of the average net profits of the Company calculated in accordance with the provisions of Section 198 of the Companies Act, 2013 as prescribed under Section 135 of the Act.

Any income arising there from and surplus generated from CSR projects undertaken by the Company shall be tracked and channelized into the CSR corpus. These funds shall be further used in development of the CSR projects and shall not be added to the normal business profits or shall be transferred to the Unspent CSR account and spent in Pursuance of CSR Policy 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.



If during any financial year the company spends an amount in excess of 2% of its average net profits, the same will be considered as excess CSR spends for the financial year and will be set-off in the immediately succeeding 3 (three) financial years subject to the fulfilment of conditions prescribed under the rules.

Further, the Administrative Overheads on CSR Activities shall not exceed 5% of total CSR spends in any financial year.

Unspent CSR amount, if any, at the end of a financial year, shall be segregated into those in relation to 'ongoing' and 'other than ongoing' projects and will be dealt with in the manner prescribed under the Act and rules issued thereunder.

Any unspent amount shall be reported by the board in its report specifying the reasons for not spending the amount and shall be dealt with, in accordance to Section 135 of the Act and the rules thereunder.

4.5 Treatment of Unspent CSR amount

As per the Companies (CSR Policy) Amendment Rules, 2021, Ongoing projects are multi-year project undertaken by a company in fulfilment of its CSR obligation having timeline of not exceeding 3 (three) years excluding the financial year in which it was commenced. Any amount remaining unspent, during the end of financial year, pursuant to any ongoing projects, shall be transferred by the company within a period of 30 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 'Unspent Corporate Social Responsibility Account' and such amount shall be spent by the company in pursuance of its obligation towards the CSR policy within a period of 3 (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 30 days from the date of completion of the third financial year.

Further, if any amount remaining unspent pursuant to 'other than ongoing projects', shall be transferred by the company to a fund specified in Schedule VII, within a period of 6 months of the expiry of the financial year.

4.6 Capital Assets

The CSR amount may be spent by the company for creation or acquisition of a capital asset, which shall be held by-

- a) A company established under section 8 of the Act or a Registered Public Trust or Registered society having charitable objects and CSR Registration number
- b) Beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities or
- c) A public authority.



4.7 Annual Action Plan on CSR Activities

As prescribed under the CSR Rules, at the beginning of every financial year, CSR Committee shall prepare a detailed Annual Action Plan on CSR Activities, for the financial year. Any deviation from Annual Action Plan will only be made with the prior approval of Board, on recommendation of CSR Committee. Annual Action plan on CSR activities shall contain detailed information on the following:

- List of CSR Projects that are to be undertaken for the financial year
- Manner of Execution of these CSR projects
- Modalities of utilization of funds
- Implementation schedules for all CSR projects
- Monitoring and Reporting mechanism for all CSR projects and
- Details of need and impact assessment, if any, for the projects undertaken by the company.

The Company may take up other CSR activities during the financial year, as may be considered appropriate.

4.8 Monitoring

The administration of the CSR Policy and the execution of identified CSR projects, programs and activities under it shall be carried out under the overall supervision and guidance of the CSR Committee formed for this purpose. The CSR Committee shall submit its progress report to the Board of Directors.

The Responsibilities of the CSR Committee shall *inter alia* include:-

- Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken by the company as specified in Schedule VII;
- Recommending the amount of expenditure for the CSR activities, and
- Monitoring CSR activities from time to time.

Further, any or all provisions of the CSR Policy shall be subject to revision/amendment by the Board based on the recommendations of the CSR Committee or else in accordance with the act, rules and guidelines on the subject as may be issued from time to time by Ministry of Corporate Affairs.

5. REPORTING

- To ensure effective implementation of the CSR activities, the committee will submit progress reports to the Board of Directors of the Company.
- CSR Committee shall ensure that Accountability is fixed at each level of CSR process and implementation.



- CSR Committee shall ensure that CSR projects and programmes are being properly documented.

6. INFORMATION DISSEMINATION

CSR Policy and CSR activities undertaken shall be disseminated on the website of the company for public access and shall be published in the Annual Report of the company in the format prescribe under the Act and CSR Rules.

7. REVIEW OF THE POLICY

The adequacy of this Policy shall be reviewed and reassessed by the CSR Committee periodically and appropriate recommendations shall be made to the Board to amend/modify the policy wherever required and/or update the policy based on the changes that may be brought about due to any regulatory amendments or otherwise.

**For and on Behalf of the Board of
KLJ DEVELOPERS PRIVATE LIMITED**

Sd/-	Sd/-
(Sunil Andley)	(Priya Ranajn)
Chairperson, CSR Committee	Member, CSR Committee
DIN: 03098680	DIN: 05336098

Date: 09.04.2021
Place: New Delhi