CORPORATE SOCIAL RESPONSIBILITY POLICY

I. CSR POLICY

This CSR policy encompasses KSBCDC's responsibility for the society and lays down the guidelines and mechanism for undertaking projects, programmes and activities towards such responsibilities.

II. VISION STATEMENT AND OBJECTIVE

- CSR Policy of KSBCDC sets out the commitment towards ensuring that our activities
 extend beyond business and include initiatives and endeavours for the benefit and
 development of the community and society. The CSR Policy lays down guidelines for
 undertaking programmes geared towards social welfare activities or initiatives.
 Through this CSR Policy, we propose to adopt the CSR Activities mentioned below.
- 2. This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act 2013 and the rules issued thereunder.
- 3. The objectives of the CSR Policy is to:
 - (i) Outline projects, programmes and activities to be undertaken by KSBCDC;
 - (ii) Specify the modalities of execution of such projects, programmes and activities;
 - (iii) Monitor the process to be followed for such projects, programmes and activities:
 - (iv) Directly or indirectly take up programmes that benefit the communities in and around its work centers and results, over a period of time, in enhancing the quality or life and economic well-being of the local populace; and

III. CSR COMMITTEE

- 1. The CSR Committee has been constituted as per the 186th Meeting of Board of Directors held on 30thy April 2018 and in accordance with the provisions of the Act comprising the following Directors;
 - (a) Sangeeth Chakrapani Chairman
 - (b) V. Rajappan Director Representative from the Finance Department
 - (c) P. Pughazendhi Director Representative from the Directorate BCDD
 - (d) A. Mahendran Director
 - (e) K.T. Balabhaskaran Managing Director

The Company Secretary shall be the secretary to the Committee. The CSR Committee may invite other experts/invitees as per its requirements.

2. The CSR Committee shall be responsible for :

- (i) Formulating the CSR Policy, including the CSR Activities and their budgets as well as recommendation of any subsequent change/modification to the CSR Policy;
- (ii) Institute an implementation and monitoring mechanism for CSR Activities;
- (iii) Periodically updating the Board on the progress being made in the planned CSR Activities;
- (iv) Providing a responsibility statement in the Board's report.

IV. PROJECTS, PROGRAMMES AND ACTIVITIES

KSBCDC has identified the following focus areas of intervention for the implementation of its CSR policy and has identified the following as the priority projects;

- (i) Improving the living conditions of the transgender, Promoting Gender Equality, setting up of homes and shelters for women and orphans.
- (ii) Financial assistance for the promotion of education by development of schools, educational institutions in the State.
- (iii) To provide and improve facilities of people living in group, especially in colonies etc.
- (iv) Ensuring environment sustainability, ecological balance, promotion of traditional arts and handicrafts etc.
- (v) To implement Cancer Care for Life, and treatment for chronic diseases to the affected people.
- (vi) Building of Houses, Residential shelters etc in the State of Kerala to the poor and needy people.
- (vii) Organizing Skill Development Programmes to poor people in accordance to their taste of job.
- (viii) Free distribution of aiding equipment to the handicapped persons.
- (ix) Financial Assistance to the talented people who are economically backward who have proved their merit at Regional level and are capable of reaching at the international level.
- (x) Such other things as specified in Schedule 7 of the Companies Act 2013 in line with Section 135.

Based on the recommendations of the CSR Committee, the Board shall approve the following:

- (i) The specific CSR Activities that should be undertaken from time to time;
- (ii) The amount of CSR Expenditure on each of the CSR Activity; and
- (iii) Whether the CSR Activities will be undertaken directly or through an implementing agency or in collaboration with any other companies, including by availing services of any NGOs and record reasons for the same.

V. IMPLEMENTATION

- 1. Baseline survey would be conducted by the implementing agency and annual reviews shall be undertaken to ascertain the progress.
- 2. The Board along with the CSR Committee shall be responsible for implementation of this CSR Policy.

VI. MONITORING MECHANISM

- 1. To ensure effective implementation of the CSR projects, programmes and activities undertaken in terms of this CSR Policy, the progress of each such project, programmes and activity will be reported to the CSR Committee on a monthly/quarterly basis, with all requisite documentation.
- 2. A quarterly report on implementation shall be submitted to the Board by the CSR Committee.
- 3. The CSR Committee will conduct impact studies on a periodic basis, through independent professional third parties/professional institutions.
- 4. The CSR Committee shall also try to obtain feedback from the beneficiaries of the CSR projects, programmes and activities. If considered necessary, the effectiveness of the various programmes/activities undertaken under the CSR Policy may be got evaluated through external agencies for providing the required feedback and inputs to formulate and improve the programmes in future.

VII. IMPACT ASSESSMENT

- 1. Regular and interactive feedback sessions shall be conducted at all levels including with other NGOs through which CSR Activities are being undertaken as well as the respective beneficiaries of all the CSR Activities undertaken by us.
- 2. Field visits shall be conducted at regular intervals to ensure effective implementation.
- 3. Proper documentation shall be done in an MIS format to record key observation of such feedback sessions and field visits.
- 4. If deemed necessary by the CSR Committee, the effectiveness of the various programmes/activities undertaken under the CSR Policy may be evaluated through external agencies and reports shall be prepared pursuant to such evaluation.

VIII. REPORTING

1. The CSR Committee shall maintain proper minutes of all its meeting.

- 2. The CSR Committee shall prepare an annual report on CSR with such information and particulars as may be required by the Act and such report shall be included in the Board's report annexed to the financial statements.
- 3. The Board's report shall include an annual report on CSR containing such details as may be prescribed from time to time under the Act and the CSR Rules.
- 4. The Board will be responsible to ensure that the statutory requirements as may be prescribed from time to time under the Act and the CSR Rules are complied with.

IX. GENERAL

- 1. All Administrative expenses, including expenditure on wages and salaries, tours and travels, and training and development of personnel deputed on CSR Activities would be borne from CSR funds. However, the expenditure in a financial year for building CSR capacities of the personnel as well as the implementing agencies shall not exceed 5% (five per cent.) of total CSR expenditure in such financial year.
- 2. If it is observed that any CSR Activity taken up for implementation is found not properly implemented, the CSR Committee may, with approval of the Board, may discontinue funding the project at any time during the course of implementation and use such funds for any other projects.
- 3. The CSR Committee shall have the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this CSR Policy.

X. AMMENDMENT

The CSR Committee is empowered to amend or modify the CSR Policy and such changes shall be placed before the Board for its approval. The Board may subject to compliance with applicable law, at any time approve or alter, amend or modify the CSR Policy, as it deems fit to comply with the statutory obligation to undertake the CSR Activities.