



**POLICY ON CORPORATE SOCIAL RESPONSIBILITY**

**✚ PREAMBLE**

The Companies Act, 2013 vide Section-135 and related applicable rules, has made mandatory for certain prescribed class of Companies to spend at least 2% of the average net profits of the Company made during the immediately preceding financial years. KIFS Trade Capital Private Limited (Herein after referred as “KIFS” or “The Company”) comes under the purview of the provisions of said section 135 of the Companies Act, 2013 and Rules framed there under.

This policy (Corporate Social Responsibility Policy) is made in accordance with and to comply with the provisions of section 135 of the Companies Act, 2013 and Rules framed there under and hence would be governed by the Act and related applicable rules for the time being in force.

**✚ OBJECTIVE**

The Company understands that being part of this society this is their moral responsibility to aid and serve the society to the maximum possible extent. The Objective of this CSR Policy is to lay down the guiding principles in undertaking various programs and projects by or on behalf of the company relating to Corporate Social Responsibility (“CSR”) within the meaning of section 135 of the Companies Act, 2013 read with Schedule VII of the Act and the CSR Policy Rules 2014(“Rules”).

**✚ DEFINITIONS**

“Act” – Act hereinafter means The Companies Act, 2013

“Board” – means Board of Directors of the Company

“CSR” – means Corporate Social Responsibility and includes but is not limited to;  
(i) Projects or programs relating to activities specified in Schedule VII to the Act; or  
(ii) Projects or programs relating to activities undertaken by the board of directors of the Company (Board) in pursuance of recommendations of the CSR Committee of the Board as per declared CSR Policy of the Company subject to the condition that such policy will cover subjects enumerated in Schedule VII of the Act

“Committee” – means the Corporate Social Responsibility Committee of the Board

“Policy” – means Corporate Social Responsibility Policy or CSR Policy

“Rules” – means Companies (Corporate Social Responsibility) Rules, 2014



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### **APPLICABILITY**

The policy shall be applicable to all CSR activities of the company whether carried on by its own or through any registered Trust/ registered Society/ Company formed under section 8 of the Act or such other implementation agency/ authority as may be allowed under the Act/ Rules framed from time to time and notified.

### **CSR COMMITTEE**

To meet the objectives of Corporate Social Responsibility of the Company, it has formed a CSR Committee with following Directors as its members:

1. Mr. Rajesh P. Khandwala – Chairman
2. Mr. Dharmendra Doshi – Member
3. Mr. Kamlesh U. Dhandhukiya – Member

The Company Secretary of the Company, Ms. Apeksha Modi shall act as the Secretary to the Committee.

### **RESPONSIBILITY OF CSR COMMITTEE**

The CSR Committee would be responsible:

- 1) To formulate and recommend to the Board, a CSR policy which shall indicate the activities to be undertaken by the Company as per the Companies Act, 2013 and also to decide upon the selection/ appointment of implementation agencies;
- 2) To review the progress of CSR projects already undertaken by the company and recommend the amount of expenditure to be incurred on the activities to be undertaken by the company further;
- 3) To monitor the CSR policy of the Company from time to time and to recommend to the Board about any Change, if required in CSR Policy;
- 4) Shall have full access to the information contained in the Company's records and to seek information from any employee, as also to obtain such legal and professional advice as it may consider necessary;
- 5) Review and recommend the CSR report to be included in the board's report;
- 6) Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be assigned/ directed by the Board of Directors from time to time.



## CSR Activities

As part of the CSR program, the company is presently engaged in several projects which are socially relevant and demanding in the locality surrounding its corporate office area and other locations where the company has branches or other place of business. The company may continue to undertake/ fund project, programs or activities of the following nature and also undertake such other activities as may be approved by the board as is falling under schedule VII of the Act 2013 as amended from time to time and Rules framed there under:

- (i) Eradication of 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) Promotion of education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- (iii) Promotion of gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens 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, agro forestry, 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 arts 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 recognized sports, Paralympics sports and Olympic sports;
- (viii) Contribution 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;  
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);



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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 i.e. any area declared as the term 'slum area' by the Central Government or any State Government or any other competent authority under any law for the time being in force;
- (xii) disaster management, including relief, rehabilitation and reconstruction activities.

### BUDGETARY ALLOCATION

The Company shall spend in every financial year, in which CSR Rules and Act applies to it, at least 2% of the average net profit of the Company made during the three immediately preceding financial years.

### MONITORING

CSR committee of the company will be responsible for the monitoring of various CSR projects or programs undertaken by the company directly or indirectly. The CSR Committee will meet whenever necessary and shall ensure that:

- a) Company undertakes the CSR activities as provided in the CSR policy.
- b) The projects/ programs are implemented as per the program approved by the board.
- c) The budget allocated for each of the project is utilized for the projects as per the approved plans.
- d) The objective of the project/program is achieved as per the plans.
- e) Wherever projects/programs are undertaken in partnership with one or more organizations/ trust/ agencies, the part of the project or program undertaken by the company shall be distinguishable and necessary supporting documents in respect of the same shall be obtained from the other partners/implementing agency on an annual basis.

Company shall provide necessary resources and human capital for implementation and the effective monitoring of the CSR projects and programs as may be directed by the CSR committee. The services of any external agencies or persons who have experience in the same or similar projects or programs undertaken or proposed to be undertaken by the company may also be made available for successful implementation and monitoring of the project.

In case the Company is not able to spend the stipulated two percent of the average net profits of the preceding three financial years or any part thereof, the CSR Committee shall provide the reasons for not spending the amount to the Board and such reasons shall also be included in the Board's report. However, the company shall make necessary efforts to spend such unspent amount in the upcoming financial year(s).

The CSR committee shall also assist the Company in responding to any query, observation or clarification sought by the Ministry of Corporate Affairs or any other regulatory authority



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with regard to the Company's CSR supported initiatives and to take such remedial actions (if and to the extent required) as may be warranted.

### **CSR REPORTING**

At the end of each financial year, the CSR committee shall prepare a report in the prescribed form relating to the CSR program/ activities undertaken by the Company during the year and submit to the Board for its inclusion in the Board's report.

### **DISPLAY OF CSR ACTIVITIES ON THE WEBSITE OF THE COMPANY**

The CSR activities shall also be displayed at the website of the Company in such format as may be prescribed by the Act and related applicable rules from time to time.

**For KIFS Trade Capital Private Limited**  
**Rajesh P. Khandwala**  
**[Chairman of Committee – DIN: 00477673]**