

1. OUR VISION & CORPORATE SOCIAL RESPONSIBILITY

- 1.1. The vision of Kalpataru Limited ("Company" or "KL") is

"To be a brand that is admired as an industry leader for its thoughtfully designed high quality innovative lifespaces, is recognized for its customer and people practices and is acknowledged for fostering long term relationship with stakeholders"

and being a responsible corporate citizen, we consider Corporate Social Responsibility (CSR) to be an important aspect towards achieving that vision.

- 1.2. The objective of the this CSR policy is to lay down guiding principles for identification, implementation, monitoring and reporting of its CSR activities in accordance with the provisions of the Companies Act and the Rules made thereunder.

2. NEED FOR CSR POLICY

- 2.1. Ministry of Corporate Affairs, Government of India has notified Section 135 being provision relating to CSR with effect from 1st April, 2014 and also notified rules namely the Companies (Corporate Social Responsibility Policy) Rules, 2014 which came into effect from the said date. The provisions relating to CSR is required to be complied with by every company which has a net worth of Rs. 500 Crores or more, or turnover of Rs. 1000 Crores or more or net profit of Rs. 5 Crores or more during any previous three financial years. Such company fulfilling any one of three criteria, shall spend at least 2% of the "average net profit" made during 3 immediately preceding financial year.
- 2.2. The Company has been contributing to various CSR and philanthropic activities from time to time. Ministry of Corporate Affairs have promulgated the Companies Act 2013 necessitating each company meeting the thresholds to institutionalize the CSR activities. In this context, the Company has constituted the CSR Committee of its Directors who have recommended the CSR Policy to the Board of Directors.

3. CSR ACTIVITIES

- 3.1. The CSR activities to be undertaken by the Company as enumerated in this policy, may be carried out by the Company either on its own or in collaboration with other companies, through (a) a registered trust or (b) a registered society or (c) a company established under section 8 of the Act, in accordance with the provisions of the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended from time to time).
- 3.2. The Company proposes to carry out the CSR activities in the following areas subject to the approval of the Board on the recommendation of CSR Committee from the time to time:
- i. eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including Contribution to 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

vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;

- iii. promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers 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, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund setup 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;
 - vii. training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
 - viii. contribution to the Prime Minister's National Relief 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. contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
 - x. rural development projects;
 - xi. slum area development.
- 3.3. Any amendments, additions or deletions in Schedule VII of the Companies Act 2013 shall be considered while proposing the CSR activities to be undertaken by the Company.
- 3.4. The Company shall give preference to the local areas and areas around it where it operates, for spending the amount earmarked for CSR activities/projects.
- 3.5. The CSR activities carried out by the Company in pursuance of this policy shall exclude the activities undertaken in pursuance of the normal course of business.
- 3.6. Any CSR activity or project that benefit only the employees of the Company and their families shall not be considered as CSR for the purpose of this Policy.

4. ALLOCATION OF FUNDS

- 4.1. The CSR Committee will spend the funds for each/any of the programs, project or activities as recommended by the CSR Committee and approved by the Board.

- 4.2. Company shall spend the available funds into two kinds of projects/ programs (a) long term (b) short to medium term projects or program. The CSR Committee shall endeavor to spend at 2/3rd funds on long term projects or programs and balance amount on the projects or programs with short term objectives.

5. Monitoring of Project and Fund Utilization

- 5.1. The CSR Committee to monitor the implementation of projects/programs/activities as approved by the Board from time to time based on the recommendation of the CSR Committee.
- 5.2. The surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company

6. ARRANGEMENT FOR CARRYING OUT CSR ACTIVITIES

- 6.1. The primary responsibility for carrying out the CSR activities is on the CSR Committee of Directors constituted by the Board of Directors of the Company. The Committee members can take the support and help of the employees of the Company and engage external consultants, Central/ State/ Local Governments/ NGOs and other implementation partners from time to time as they may deem fit.
- 6.2. The Committee may constitute small groups from the employees of different sections for carrying out CSR related activities under its supervision.
- 6.3. Company shall encourage and support its employees to contribute their time and skills towards identified CSR activities

7. DISCLOSURE/REPORTING

As required by the provisions of the Companies Act and Rules made thereunder, the Board of Directors shall, after taking into account recommendations of CSR Committee, approve the CSR policy and disclose contents of such policy in its report and the same shall be displayed on the Company's website, if any, as per the particulars specified Companies (Corporate Social Responsibility Policy) Rules, 2014.

8. POLICY DOCUMENTS TO BE REFERRED FOR IMPLEMENTATION OF CSR ACTIVITIES

- a) CSR policy of the Company
- b) Any subsequent notification / circular / amendments / modification / revision / addendum to the aforesaid acts and rules issued by the Ministry of Corporate Affairs, Government of India.

9. GENERAL

- a) CSR Committee shall ensure that the CSR activities/projects/programs, pursuant to this policy, shall be strictly in accordance with the provisions of Section 135 of the Companies Act, 2013 relating to CSR and Companies (CSR) Rules, 2014 as amended from time to time. CSR Committee shall ensure that all the CSR Activities/Projects/Programs

are aligned/ re-aligned according to the regulatory framework from time to time by recommending to the Board.

- b) The CSR Committee shall review the CSR policy at the interval of at least once a year (or such other periodicity as may be prescribed in this regard under Companies Act 2013 and Rules made thereunder) from the date of this policy coming in to force.

PLACE : MUMBAI
DATE : 28TH MARCH 2015