

KLT AUTOMOTIVE AND TUBULAR PRODUCTS LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

1. VISION STATEMENT

KLT, 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, in fulfillment its role as a Socially Responsible Corporate, with environmental concern.

2. OBJECTIVES

- To serve the social, economic, cultural interest of human being in the community.
- To directly or indirectly take up programmes that benefit the communities in & around its work centers and results, over a period of time, in enhancing the quality of life & economic well- being of the local populace.
- To generate, through its CSR initiatives, goodwill and pride for KLT among stakeholders and help reinforce a positive & socially responsible image of KLT as a corporate citizen.

3. COMPOSITION OF CSR COMMITTEE OF THE BOARD

This CSR Policy has been formulated in consonance to the provisions of Section 135 of the Companies Act, 2013 read with Schedule VII ("the Act") and in accordance with the Companies (Corporate Social Responsibility Policy) Rules, 2014 notified by the Ministry of Corporate Affairs, Government of India in 2014.

In accordance with provisions of the above mentioned Act, and Rules, the Board of Directors of the Company has formed a committee of Board of Directors named as Corporate Social Responsibility Committee (CSR Committee).



4. FOCUS

The Company will undertake all such CSR Activities, as may be decided/approved by the Board of Directors which falls within the purview of the Act, Rules and amendments thereto from time to time

The major focus areas of CSR activities would as under:

- Promoting Education / Skill Development.
- Promoting research and development in Agriculture, Horticulture etc.
- Promoting health care, medical help/assistance to the needy.
- Empowering women
- Setting up homes and hostels for women and orphans
- Undertake environmental friendly measures like tree plantation
- Rural/ Agricultural extension/ development projects

Besides undertaking direct CSR activities, the Company may take contributions to Prime Minister's Relief Funds and any other Government approved funds/ Schemes or Organizations / Universities/ Research institutes etc. as permitted/ allowed under the Act.

5. CSR IMPLEMENTATION:

Programmes/ activities to be undertaken by the Company under the head CSR shall be as approved by Board of Directors (the Board) in pursuance of recommendations of the CSR Committee of the Board

6. CSR MONITORING

The CSR Committee will be responsible for monitoring the progress of projects or programmes undertaken by KLT. The CSR Committee can appoint a person or external agency to monitor the progress of projects or programmes



7. REPORTING/DISCLOSURE OF THE POLICY

The following regulatory disclosure requirements also need to be complied in relation to CSR activities of the Company apart from the reporting requirement as mentioned hereinabove in the Policy.

- Composition of the CSR Committee shall be disclosed in the Board Report
- The Board Report shall include an annual report on CSR activities in prescribed format (by MCA) containing specified particulars i.e Brief Outline of CSR Policy, its content, the Average Net Profit for the last three financial years, and the prescribed CSR Expenditure etc;
- If the Company fails to spend the prescribed amount, the Board shall, in its report specify the reasons for not spending the amount; and
- The content of Corporate Social Responsibility (CSR) policy shall be displayed on the Company's website, if any.

8. RESPONSIBILITY OF THE COMMITTEE

The responsibilities of the CSR Committee include:

- Formulate and recommend to the Board, a CSR policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013.
- Recommend the amount of expenditure to be incurred on the CSR activities.
- Monitor the CSR Policy of the Company from time to time

9. FREQUENCY OF MEETINGS OF THE CSR COMMITTEE

CSR Committee of the Company shall meet once a year

10. EXCLUSION OF THE FOLLOWING ITEMS FROM CSR

The following activity shall not form part of the CSR activities of the Company:-

- The activities undertaken in pursuance of the normal course of business of a Company.
- CSR Projects/ programmes or activities that benefit the employees of the Company and their families

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11. GENERAL

In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference will be made to the Board of Directors by CSR Committee. In all such matters, the interpretation & decision of the Board of Directors shall be final.

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from Government, from time to time.

The Company reserves the right to modify, cancel, add, or amend any of these Rules.

For KLT Automotive and Tubular Products Limited



Bhavin K Thakkar

Chairman & Managing Director

DIN No. 00001780

