

**KINECO KAMAN COMPOSITES INDIA PRIVATE LIMITED  
CORPORATE SOCIAL RESPONSIBILITY POLICY-updated 25 Sept-2019**

**1. Preamble:** Kineco Kaman Composites India Private Limited (KKCI) has always endeavoured to conduct its business responsibly in compliance with applicable laws as well as being mindful of its social accountability. KKCI is committed to fulfilling its responsibilities to society in a qualitative manner beyond statutory obligations in line with the responsibility bestowed by the JV Partners on the KKCI.

**2. Purpose:** In alignment with the legal framework on corporate social responsibility contained in Section 135 and Schedule VII of the Companies Act, 2013 (“Act”) alongwith Companies (Corporate Social Responsibility Policy) Rules 2014 (“Rules”), this Policy establishes a consistent Corporate Social Responsibility (CSR) framework for the KKCI. The key purposes of this policy are to:

- Serve as a guide in defining, executing, monitoring and reporting all CSR projects
- Identify broad areas in which CSR projects will be undertaken
- Governance Structure, Implementation strategy & Review mechanism

**3. Scope:** This policy applies to all CSR projects undertaken by the KKCI in compliance with the Act and the Rules. The KKCI shall ensure all these activities are carried out over and above its normal course of business and are in line with Schedule VII of the Act. The KKCI shall give preference to the local areas around its manufacturing facility, for spending part of the amount earmarked for CSR Activities.

**4. Focus Areas:** The KKCI will undertake CSR activities by supporting the projects undertaken by registered & recognised NGOs, trust or societies in the following focus areas:-

1. initiatives aimed at transforming the lives of street children through education, skill development and access to opportunities
2. improving the water, sanitation and hygiene facilities in needy schools and localities; supporting waste management agencies under Swachh Bharat Abhiyan.
3. skill Development, employability and technology incubations
4. plantations and afforestation activity with a view to ensuring environmental sustainability and ecological balance.
5. supporting relief & rehabilitation measures during natural disasters through donations to funds set up by the Central or State Government.

**5. Governance Structure, Implementation strategy & Review mechanism**

The CSR Committee of the Board will govern and review the CSR initiatives of the KKCI from time to time. The composition of the CSR committee of the Board is as hereunder:

1. Mr. Shekhar Sardesai - Chairman
2. Mr. Richard Barnhart - Member
3. Mr. Sanjay Asher - Member

The KKCI Secretary of KKCI shall act as a Secretary of the Committee.

The terms of reference of CSR Committee shall, inter-alia, include the following:

- To formulate and recommend to the Board, a CSR policy which shall indicate the activities to be undertaken by the KKCI as per the Act;
- To review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the KKCI;
- To monitor the CSR policy of the KKCI from time to time;
- Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors from time to time.

The Board CSR Committee shall delegate auxiliary power to the Working Committee (comprising of such members as may be nominated by the Board of Directors from time to time) of the KKCI for implementing the CSR Policy on its behalf.

The CSR Implementation committees will review and report activities, outcomes and impact of the initiatives on a periodic basis to the Board. This CSR policy document will be reviewed from time to time and any changes, if necessary, will be approved by the CSR Committee of the Board.