

Mining Milestones, Constructing Legacies

CORPORATE SOCIAL RESPONSIBILITY

UPDATED UPTO MARCH 3, 2025 S K KHETAN INFRAPROJECTS PRIVATE LIMITED 43-44, I Block, Sector-14, Udaipur, Rajasthan, India, PIN-313001



INTRODUCTION

Corporate Social Responsibility ("CSR") is the Company's commitment to the Nation to conduct the business in a socially and environmentally sustainable manner that is transparent and ethical.

CSR POLICY

This policy ("Policy") spells out the Company's philosophy towards its CSR and lays down the guidelines, framework and mechanism for effective planning, implementation and monitoring of its CSR initiatives.

MANNER OF IMPLEMENTATION

S K Khetan Infraprojects Private Limited will implement its CSR activities directly or indirectly through any NGOs/institutes/trusts as identified from time to time to achieve defined objectives. Such implementing agencies shall have an established track record as prescribed under the law.

FOCUS AREAS OF CSR PROJECT

The Company will undertake CSR activities as enlisted in Schedule VII of the Companies Act, 2013 including amendments thereto (hereinafter referred as 'the Act') and the Companies (Corporate Social Responsibility Policy) Rules, 2014 as framed thereunder which shall include any amended thereto from time to time (hereinafter referred as 'CSR Rules') including the below areas of activities:

- 1. Eradicating 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;
- 2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- 3. 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;
- 4. 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 art and handicrafts;
- 5. 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];
- 6. Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- 7. Contribution to Prime Minister's Relief Fund or any other fund set up by the Central Government for socio economic development and relief and welfare of the schedule caste, schedule tribes, other backward classes, minorities and women;
- 8. 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;
- 9. Grants to NGO's, Trusts, 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 Défense Research and Development Organization (DRDO); Indian Council of Agricultural Research (ICAR); 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);

- 10. Rural development projects;
- 11. Slum area development. For the purposes of this item, the term `slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force; and
- 12. Disaster management, including relief, rehabilitation and reconstruction activities.

RESOURCES

- 1. S K Khetan Infraprojects Private Limited will provide 2% of the average net profits made during the 3 (three) immediately preceding financial years in compliance with the provisions of the Companies Act, 2013 as amended from time to time and in pursuance of this policy.
- 2. S K Khetan Infraprojects Private Limited may on its own do specified CSR activities directly or indirectly through any NGOs/institutes/trusts as identified from time to time to achieve defined objectives.
- 3. If the Company fails to spend the allocated CSR amount, the Board shall in its report made under clause(o) of sub-section (3) of section 134 of Companies Act, 2013, specify the reasons for not spending the amount.

BOARD OF DIRECTORS

The Board of Directors shall perform the following Role with respect to Administration of CSR activities of the Company carried out in accordance with this policy as under:

- 1. To approve the CSR Policy and the CSR Expenditure after taking into consideration the recommendations made by the CSR committee.
- 2. Ensure the CSR spending every financial year of at least 2% of average net profits made during immediately preceding three financial years, in pursuance with the Policy.
- 3. Ensure disclosure of the contents of the CSR Policy on the Company website.
- 4. Preparation of annual report on the CSR activities in the prescribed format as per the Companies Act, 2013.

CSR COMMITTEE

The CSR Committee as constituted will be responsible for identification and implementation of CSR activities of the Company. The details of the composition shall be hosted on the Company's website at **https://skkhetangroup.com/**. CSR Committee will be responsible for:

- 1. Formulate and update CSR policy of S K Khetan Infraprojects Private Limited and place the same before the Board for approval.
- 2. Formulate and recommend to the Board an Annual CSR Budget under various categories and activities to be undertaken which are in line with the CSR Policy of the Company, which are as follows:
 - a. The list of CSR activities, projects or programmes that are approved to be undertaken in the area of Schedule VII;
 - b. Manner of the execution of such projects;
 - c. Modalities of utilization of funds and implementation of schedule for the projects;
 - d. Monitoring and reporting mechanism for the projects or programmes; and
 - e. Details of need and impact assessment, if any, for the project undertaken by the Company.
- 3. Recommend the amount of CSR expenditure to be incurred on the activities referred in clause (2) for approval of the Board.
- 4. Put monitoring mechanisms in place to track the progress of each project.
- 5. Undertake such other duties and responsibilities as specified under the Act and the CSR Rules.



CSR EXPENDITURE

- 1. The CSR Committee shall recommend to the Board the amount of CSR Expenditure to be incurred in a particular Financial Year in accordance with the Act and the CSR Rules including the activities/projects (whether or not an ongoing project) identified as a part of the Annual Action Plan.
- 2. If any amount is spent in excess of requirement as prescribed under the Act, such excess amount will be set off against the requirement of CSR amount to be spent in immediately succeeding three financial years with approval of Board to that effect.
- 3. The Company shall not spend more than 5% of the total CSR expenditure in any financial year on administrative expenses relating to the general management and administration of CSR activities of the Company.

CSR MONITORING AND EVALUATION PROCESS

CSR Committee will review periodically all S K Khetan Infraprojects Private Limited social initiatives and the report will be submitted to the board of directors. The Company shall undertake impact assessment of its CSR projects/programs, if any, as required under the Act, through an independent agency.

CSR REPORTING

The CSR Policy on being approved by the Board, along with the composition of the CSR Committee, and CSR projects approved by the Board, shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

CHAIRPERSON