SHREE KRISHNA PAPER MILLS & INDUSTRIES LIMITED CORPORATE SOCIAL RESPONSIBILITY POLICY

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)

Shree Krishna Paper Mills & Industries Limited ("SKPMIL") believes in engaging and giving back to the community in a good way and in line with the Companies commitment to philanthropy. This policy encompasses the Company's philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large. This policy aims to ensure that the Company as a socially responsible corporate entity contributes to the society at large.

Our vision – to actively contribute to the social and economic development of the communities in which we operate. In so doing build a better, sustainable way of life for the weaker sections of society and raise the country's human development index.

CSR Committee

The CSR Committee has been constituted by the Board of Directors ("Board") in terms of the requirements of Section 135 of the Companies Act, 2013 ("Act") and other applicable provisions of the Act comprising of three Directors, two Directors being Non-Executive Independent Directors and one being a Non-Executive Director. The Chairman of the Committee is a Non-Executive Independent Director.

The Company Secretary shall act as a Secretary to the CSR Committee.

The Committee, as mandated under Section 135 (3) of the Act, shall:-

- (a) formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII;
- (b) recommend the amount of expenditure to be incurred on the activities referred to in (a);
- (c) monitor the Corporate Social Responsibility Policy of the Company from time to time;
- (d) Annually report to the Board, the status of the CSR activities and contributions made by the Company; and
- (e) Any other requirements mandated under the Act or Rules issued thereunder.

CSR Activities

- 1) SKPMIL's CSR activities would be in the form of well-defined projects or programmes, the outcomes of which could be measured objectively.
- 2) Schedule VII lists out the activities which may be included by Companies in their

corporate social responsibility activities. The said activities include the following:

- i) Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation including contribution to the Swach 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/ hostels for women & orphans; setting up old age homes, day care centres & such other facilities for senior citizens and measures for reducing inequalities faced by socially & 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;
- vii) Training to promote rural sports, nationally recognised 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. Such other activities as may be prescribed from time to time.
- xi) Slum area development.

Restricted Activities

- 1) The Company shall endeavour not to include any of the business activities undertaken in the normal course of business of the Company within the ambit of CSR activities.
- 2) Contribution of any amount directly or indirectly to any political party under Section 182 of the Act, shall not be considered as CSR activity.
- 3) CSR Projects or activities that benefit only the employees of the Company and their families shall not be considered CSR activities.

- 4)No contribution to be made for any activities undertaken outside India. The surplus, if any arising out of the CSR projects or programmes or activities shall not form part of the business profit of the Company.
- 5) Expenditure not in line with the CSR Activities shall not be included.
- 6) One off events such as Marathons/awards/charitable contributions/advertisement /sponsorships of TV programmes etc would not be qualified as CSR expenditure
- 7) Expenses incurred by companies for fulfilment of any Act/Statute of regulations would not count as CSR Expenditure under the Companies Act.

CSR Expenditure

The Board shall approve overall limits for CSR Activities to be undertaken by the Company. Within the overall limits approved by the Board, the CSR Committee shall approve individual projects / programs.

The CSR expenditure shall be as prescribed under Section 135 of the Act and Companies (Corporate Social Responsibility) Rules, 2014. CSR expenditure will include both direct and indirect expenditures, incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Policy. Any surplus arising from any CSR projects, programmes or activities shall not form part of the business profit of a Company and shall be utilized towards the CSR activities.

The Company may undertake the CSR activities either on its own or Collaboration through a Trust/ Society/ Non-Profit Organisation.

Location

All CSR projects / programs under this policy shall be undertaken in India. The CSR Committee shall decide on locations for implementation of the CSR projects/programs.

Monitoring Mechanism

- (a) CSR committee shall be required to meet as and when required to discuss, review and monitor the CSR activities of the Company.
- (b) CSR Committee shall obtain and review the relevant progress reports and impact of various CSR programs/projects/activities implemented and to identify gaps/slippages therein and to plan corrective measures as may be required for the purpose.
- (c) CSR Committee shall ensure that the projects/programs/activities that are undertaken by the Company are in compliance with various applicable laws/regulations of the areas as identified for CSR expenditure.

(d) CSR Committee shall ensure that appropriate documentation of all the programs/projects/activities, statements of the budget & expenditure are being undertaken on regular basis.

Disclosures

The company shall place the contents of Corporate Social Responsibility Policy on the website of the company.

Annual Report on CSR Activities shall be prepared and be attached with Company's Board Report as prescribed under the Companies Act, 2013.

Review/Amendment

This Policy may be amended from time to time by the Board on the recommendation of the CSR Committee. In case any provision(s) of this Policy is contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed there under and Listing Regulations ("Statutory Provisions"), the Statutory Provisions shall prevail.

Further, amendments in the Statutory Provisions shall be binding even if not incorporated in this Policy.