KW HOMES PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

(Applicable for Financial Year 2025-26 and thereafter, as amended from time to time)

1. PREAMBLE

KW Homes Private Limited (the "Company"), one among the Group Companies of KW Group, lays emphasis on improving and transforming the lifestyles of its occupants and users. Among the earliest adopters of eco-friendly construction methodologies, the Company has focused on sustainable growth since its inception.

Besides its business objectives, the Company recognises its responsibility towards society and stakeholders and shall undertake Corporate Social Responsibility ("CSR") activities in accordance with Section 135 of the Companies Act, 2013 (the "Act"), Schedule VII to the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 ("CSR Rules"), as amended from time to time.

2. POLICY OBJECTIVE

The objective of this Policy is to establish the principles, framework and mechanism for identification, approval, implementation, monitoring and reporting of CSR projects and activities undertaken by the Company, while ensuring compliance with applicable provisions of the Act and CSR Rules.

The Company shall endeavour to undertake CSR initiatives that create sustainable and measurable social, environmental and economic impact and are aligned with the activities specified in Schedule VII to the Act.

3. APPLICABILITY AND GOVERNANCE

This Policy shall apply to all CSR projects and activities undertaken by the Company in India under Section 135 of the Act and the CSR Rules, as applicable.

Where the Company is required to constitute a CSR Committee under the Act, the Board shall constitute such Committee in accordance with the applicable statutory requirements. Where, in accordance with Section 135(9) of the Act, the amount required to be spent by the Company under Section 135(5) does not exceed the prescribed threshold, the functions of the CSR Committee shall be discharged by the Board of Directors.

4. ROLE AND RESPONSIBILITIES

4.1 Board of Directors

- Approve this CSR Policy and any subsequent amendments thereto.
- Approve the CSR activities/projects and the annual CSR budget in accordance with applicable law.
- Approve the Annual Action Plan and any permissible modifications thereto.
- Ensure that the Company spends the prescribed CSR amount in accordance with Section 135 and the CSR Rules.
- Ensure that administrative overheads, unspent CSR amounts, surplus arising from CSR activities and excess CSR expenditure are dealt with in accordance with applicable law.
- Monitor implementation and utilisation of CSR funds and satisfy itself regarding the utilisation of the disbursed CSR funds.
- Ensure statutory disclosures and reporting relating to CSR are made in the prescribed manner.

4.2 CSR Committee, where applicable

- Formulate and recommend to the Board the CSR Policy and amendments thereto.
- Recommend CSR activities/projects and the amount of expenditure to be incurred.
- Monitor the CSR Policy and implementation of approved CSR projects.
- Recommend the Annual Action Plan and monitor progress against approved objectives.

5. CSR PROJECTS, PROGRAMMES AND ACTIVITIES

The Company shall undertake CSR activities as approved by the Board from time to time in any one or more of the areas specified in Schedule VII (as amended from time to time) of the Act.

CSR activities shall be undertaken by the Company in adherence with this CSR Policy and preference shall be given to the local area and areas around where the Company operates, for spending the amount earmarked for CSR activities .

CSR activities shall be undertaken within India and shall not include activities undertaken in pursuance of the normal course of business, except where specifically permitted by applicable law.

6. IMPLEMENTATION OF CSR ACTIVITIES

The Board shall ensure the CSR activities are undertaken by the Company itself or through:

- Company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company;

- Company established under section 8 of the Act or a registered trust or registered society, established by the Central Government or State Government;

- Any entity established under an Act of Parliament or a State legislature.

- Company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities

The Company shall undertake due diligence before engaging an implementing agency and shall enter into appropriate arrangements setting out the scope, deliverables, timelines, utilisation of funds, monitoring, reporting and other relevant conditions.

7. CSR EXPENDITURE AND FINANCIAL MANAGEMENT

- The Company shall spend, in every financial year, at least the prescribed amount required under Section 135 (5), being two per cent of the average net profits of the Company made during the three immediately preceding financial years, calculated in the manner prescribed under the Act and CSR Rules.
- Administrative overheads shall not exceed five per cent of the total CSR expenditure of the Company for the financial year.
- Any surplus arising out of CSR activities shall not form part of the business profits of the Company and shall be dealt with in the manner prescribed under the CSR Rules.

- Where the Company spends an amount in excess of the prescribed CSR obligation, such excess may be set off against CSR expenditure requirements of the immediately succeeding three financial years, subject to the conditions prescribed under the CSR Rules and approval of the Board.
- CSR expenditure may be incurred for creation or acquisition of capital assets only in accordance with the conditions prescribed under the CSR Rules.

The Company shall maintain appropriate records, supporting documents, utilisation certificates and other evidence relating to CSR expenditure and implementation.

8. UNSPENT CSR AMOUNT

Any unspent CSR amount shall be dealt with strictly in accordance with Section 135(5) and 135(6) of the Act and the CSR Rules, as applicable.

- Where the unspent amount does not relate to an ongoing project, it shall be transferred to a Fund specified in Schedule VII within a period of 6 months from the end of financial year as prescribed in Section 135(5) of the Act.
- Where the unspent amount relates to an ongoing project, it shall be transferred to the Unspent CSR Account within the 30 days from the end of Financial Year as prescribed period in Section 135(6) of the Act and utilised for the approved project within a period of three years from the date of such transfer.

The Company shall make all related statutory disclosures and filings in respect of unspent CSR amounts, wherever applicable.

9. MONITORING AND REVIEW

The Board shall establish appropriate monitoring mechanisms to review the progress of CSR projects, utilisation of funds and achievement of approved objectives. Implementing agencies and Company personnel involved in CSR activities shall provide periodic progress and financial reports to the Company.

The Company may undertake field visits, review meetings, utilisation verification, outcome assessments and other appropriate monitoring measures depending upon the nature and scale of the CSR project.

10. DISCLOSURE AND REPORTING

The Company shall follow and comply with the requirements for disclosure of the CSR Policy and/ or CSR activities in the Board's Report of the Company or otherwise, as may be required in terms of the provisions of the Act, as applicable from time to time.

11. EXCLUSIONS

CSR expenditure shall not be incurred on activities that are specifically excluded under the Act or CSR Rules, including activities undertaken in pursuance of the normal course of business, contributions to political parties, activities benefitting employees exclusively, sponsorship activities undertaken for deriving marketing benefits, and activities undertaken outside India, except to the extent specifically permitted by law.

12. AMENDMENT

The Board of Directors may, based on its assessment of the Company's needs, financial soundness, legal and regulatory developments, subject to compliance with the applicable laws and rules, at any time modify, change, vary, alter, amend this CSR Policy.

Issued for and on behalf of the Board of Directors of KW Homes Private Limited

Sd/-
Pankaj Kumar Jain
Managing Director