



LKP SECURITIES LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

Preamble

The Company, LKP Services Limited recognizes the responsibilities towards society and strongly intends to contribute towards development of knowledge based economy, promoting healthcare, environment sustainability and other areas of society benefits at large.

In accordance with 135 of the Companies Act, 2013 every company having net worth of Rs. 500 crore or more, or turnover of Rs. 1,000 crore or more or a net profit of Rs. 5 crore or more during any financial year shall constitute a Corporate Social Responsibility Committee and shall ensure that the company spends, in every financial year, at least two per cent of the average net profits of the company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.

The company would carry out its responsibilities of Corporate Social Responsibility for the year and on continuous basis with a collective goal on key focus areas enumerated in this policy.

Our Vision

Being a good corporate citizen, LKP Securities Limited has adopted CSR as strategic tool for sustainable growth and has decided to contribute to the development of the communities as a whole. The Company strongly promotes to build a better society, aiming at Environmental Sustainability, Education, promoting healthcare and other social welfare areas.

Our CSR Program

LKP's CSR activities will be implemented through a registered trust or a registered society or a Company established by the Company or its holding or subsidiary or associate company under Section 8 of the Companies Act, 2013 or through Collaborative partnerships formed with the Government / District authorities, or NGOs, or otherwise, provide that:

- 1) If such trust, society or company is not established by the Company or its holding or associate company, it shall have an established track record of 3 (three) years in undertaking similar programs or projects;
- 2) The Company has specified the project or programs to be undertaken through these entities, the modalities of utilization of funds on such projects and programs and the monitoring and reporting mechanism.

Identification of programs for CSR as specified in SCHEDULE VII of the Companies Act, 2013

1. Eradicating hunger, poverty and malnutrition, promoting 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. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
4. 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;
5. 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;
6. Measures for the benefit of armed forces veterans, war widows and their dependents;
7. Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
8. Contribution to the Prime Minister's National Relief Fund or any other fund set up

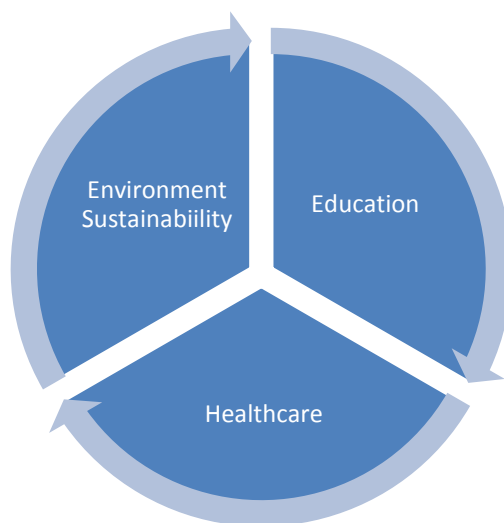
by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;

9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

10. Rural development projects;

11. Slum Area Development;

CSR Core Focus Areas



The focus areas in which LKP plans to work shall include Education, Health care and Environmental Sustainability. The objectives of the Company for the above activities shall be as follows:-

1. Education: Our endeavor is to spark the desire for learning and enlighten minds. We may undertake to fulfill this objective by way of providing quality education initiatives or by financial assistance to the poor and needy students, undertaking to impart vocational training, adult education programs, girl education, other related infrastructure etc.
2. Health care: Our goal is to render quality health care facilities which we may provide by way of undertaking preventive healthcare programs by way of including but not limited to setting various camps and related infrastructure services, providing of sanitation and making available safe drinking water, etc.
3. Environmental Sustainability: We aim at providing livelihood in an

environmentally sustainable manner. For addressing this objective we may undertake afforestation, planting of trees, maintain public garden, playground cleanliness and such other like programs, activities towards maintaining ecological balance, quality of soil, air and water, conservation of natural resources, etc.

Further, the Company on the recommendations of the CSR Committee may also undertake any other activities as mentioned in the Schedule VII of the Companies Act, 2013, apart from those mentioned above in pursuance of achieving its CSR objectives.

Implementation Process

Prior to the commencement of any programme(s)/activity (ies), the Company shall consider various parameters and based on the same it shall choose the appropriate project. All projects would be assessed under the agreed strategy and monitored on a regular basis - the set targets vis-à-vis the budgets. Midcourse corrections, if necessary, would also be carried out.

Prohibited Activities under CSR

The Company will abstain from carrying out following activities under CSR which may create dissatisfaction among any section of the Society:-

1. Activities concerned with religion like construction of temple/mosque etc.
2. Activities disturbing social harmony in any manner.
3. Activities do not include the activities undertaken in pursuance of normal course of business of a company.
4. CSR projects or programs or activities that benefit only the employees of the company and their families shall not be considered as CSR activities as provided in the Companies (Corporate Social Responsibility Policy) Rules, 2014.
5. Contribution of any amount directly or indirectly to any political party as given under Section 182 of the Companies Act, 2013 shall not be considered as CSR activity.

CSR Committee

A Committee of Board of Directors has been formed in line with the Section 135 of the Companies Act, 2013. LKP Securities Limited CSR Committee comprises three Directors, including one Independent Director, as below:

1. Mrs. Anjali Suresh
2. Mr. Pratik M. Doshi
3. Mr. Satvinderpal Singh Gulati

The Committee shall be inter alia be responsible to:

- Formulate and recommend to the Board a CSR Policy which shall indicate the activities to be undertaken by the Company in accordance with the provisions of Schedule VII of the Companies Act, 2013.
- Recommend to the Board the Amount of expenditure to be incurred on the activities referred to in the CSR policy.
- Monitor the CSR Policy and its implementation from time to time.

Capacity building

The Company may also build CSR capacity of its own personnel and the personnel of those agencies who shall undertake CSR activities for the Company, by training them to think and manage the resources of the Company in a more efficient manner. CSR expenditure such as the salary of such personnel(s) / volunteers who are engaged in CSR activities can be factored as CSR spending towards the CSR project cost of the Company. However, the amount spent on this cannot make up more than 5% of the overall CSR spend for the year.

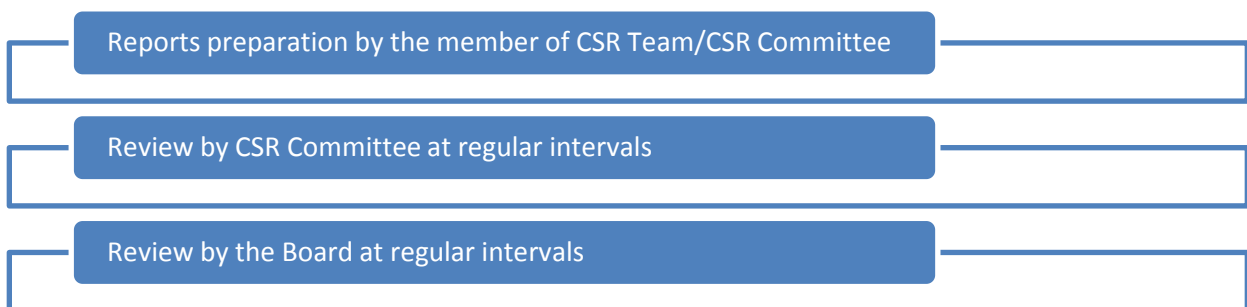
Governance

The members of the CSR Committee shall be responsible for conducting all the CSR activities. It shall meet at such intervals as it may deem necessary.

However, the Committee may also form a CSR Team consisting of such number of persons who may either be employees of the Company or other external persons, as may be required, as its authorized representative for the purpose of implementing, reviewing and overseeing the overall CSR process, and the said Team shall report to the CSR Committee.

Monitoring, Review and Evaluation

The CSR projects will be monitored and reviewed as below:



Budgeting and Allocation of Funds

1. CSR committee of the Company shall arrive at the minimum amount available for CSR spending which will be as per the calculation of 2% of the average net profit based on financial statements of the three preceding financial years as defined in accordance with the applicable provisions of the statute, and as amended from time to time.
2. The Board of Directors shall approve annual budget allocations to be spent on CSR by the CSR Committee, if applicable.
3. Provision shall be kept for maintenance of developed infrastructure. The utilization of maintenance fund shall be based on collective decision of the CSR Committee.
4. Expenditure for building CSR capacities of the employees shall not exceed 5% of the total CSR expenditure in one financial year.
5. For ensuring effective delivery, all projects initiated shall be financed in a phased manner. Funds shall be committed for long-term projects and shall be disbursed on a yearly/quarterly installment basis, as approved CSR Committee.
6. Any Profit arising out of the CSR projects or programs or activities shall not form part of the business profit of the company and unspent budget amount, if any, shall be reported in the Annual Report.

Reporting

The Company's advancement in the CSR segment shall be disseminated on its website and annual reports. The CSR policy shall be displayed on the Company's website.

Closing Notes

It will be the endeavor of the Company to sow the seeds of good acts and reap its benefit in form of a more stable and sustained surrounding.

The Board reserves a right to amend any provision of this policy based on the recommendation of the CSR Committee and in accordance with the statutory provisions issued in this behalf from time to time.
