

## **BUSINESS RESPONSIBILITY STATEMENT**

### **About KAMA Holdings Limited**

It is a Core Investment Company engaged in the business of holding long term investments in the following subsidiaries:

**SRF Limited (SRF)** a manufacturing Company which along with its subsidiaries is engaged in the business of manufacture of nylon tyre cord fabric, packaging film and fluoro Chemicals and speciality Chemicals Business. It is listed on both NSE and BSE. Other details are given on the website [www.srf.com](http://www.srf.com)

**Shri Educare Limited (SEL)** is an entity providing quality education, essentially by way of setting up schools (from nursery to class 12) and pre-schools, and undertaking education consultancy, in India and abroad. These schools are modeled on the pattern of The Shri Ram Schools, an initiative of SRF Foundation, the social wing of SRF Limited. Shri Educare Maldives Limited which is a wholly owned subsidiary of SEL is engaged in running a school in Maldives in partnership with Maldives Government.

**KAMA Realty (Delhi) Limited, inter-alia** owns commercial properties in Gurgaon and Mumbai. KAMA Real Estate Holding LLP is a subsidiary of KAMA Realty (Delhi) Limited engaged in acquisition and renting of commercial real estate.

**SRF Transnational Holdings Limited** is a registered NBFC engaged in the business of investment in securities of other companies.

### **About this report**

The Securities and Exchange Board of India (SEBI) as per its (Listing Obligations and Disclosure Requirements) Regulations, 2015 has mandated the inclusion of a "Business Responsibility Report" (BRR) as part of Company's Annual Report for top 500 listed entities based on market capitalisation at the BSE Ltd. (BSE). The reporting framework is based on the 'National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (NVGs)' released by the Ministry of Corporate Affairs, Government of India, in July 2011 which contains 9 Principles and Core Elements for each of the those 9 Principles. Following is the first Business Responsibility Report of our Company which is based on the format suggested by SEBI.

### **Section A : General Information about the Company**

<b>1.</b>	<b>Corporate Identity Number (CIN) of the Company</b>	<b>:</b>	L92199DL2000PLC104779
<b>2.</b>	<b>Name of the Company</b>	<b>:</b>	KAMA Holdings Limited
<b>3.</b>	<b>Registered Address</b>	<b>:</b>	The Galleria, DLF Mayur Vihar, Unit No. 236 & 237, Second Floor, Mayur Place, Noida Link Road, Mayur Vihar Phase I Extn, Delhi- 110 091
<b>4.</b>	<b>Website</b>	<b>:</b>	<a href="http://www.kamaholdings.com">www.kamaholdings.com</a>
<b>5.</b>	<b>Email id</b>	<b>:</b>	<a href="mailto:info@kamaholdings.com">info@kamaholdings.com</a>
<b>6.</b>	<b>Financial Year reported</b>	<b>:</b>	2018-19
<b>7.</b>	<b>Sector(s) that the Company is engaged in (industrial activity code-wise)</b>	<b>:</b>	KAMA Holdings Limited is a Core Investment Company (CIC) within the meaning of Core Investment Companies (Reserve Bank) Directions 2011, which does not require registration with Reserve Bank of India under the said Directions.
<b>8.</b>	<b>List three key products/services that the Company manufactures/provides (as in balance sheet)</b>		
	- KAMA Holdings Limited is a Core Investment Company engaged in Holding long term investments in the shares of Subsidiaries.		
<b>9.</b>	<b>Total number of locations where business activity is undertaken by the Company</b>		
	<b>i) Number of International Locations (Provide details of major 5)</b>		
	N.A		

ii)	<b>Number of National Locations</b>	
	KAMA Holdings Limited has business activity in 2 locations across the country.	
	State	Location
	Delhi	Delhi
	Haryana	Gurugram
10.	<b>Markets served by the Company – Local/State/National/ International</b>	
	NA	

**Section B : Financial Details of the Company**

1.	<b>Paid up Capital (INR)</b>	:	1,937.20 lakhs
2.	<b>Total Turnover (INR)</b>	:	3787.34 lakhs
3.	<b>Total profit after taxes (INR)</b>	:	3772.47 lakhs
4.	<b>Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%) calculated in accordance with Companies Act, 2013</b>	:	NA
5.	<b>List of activities in which expenditure in 4 above has been incurred</b>	:	NA

**Section C : Other Details**

1.	<b>Does the Company have any Subsidiary Company/Companies ?</b>
	Following are the subsidiary companies :- 1. SRF Limited 2. KAMA (Realty) Delhi Limited 3. Shri Educare Limited 4. SRF Transnational Holdings Limited 5. Shri Educare Maldives Pvt. Ltd 6. SRF Global B.V 7. SRF Industries (Thailand) Ltd 8. SRF Flexipak (South Africa) (pty) Ltd 9. SRF Industex Holdings (Pty) Ltd. 10. SRF Europe Kft, Hungary 11. SRF Holiday Home Ltd. 12. KAMA Real Estate Holdings LLP
2.	<b>Do the Subsidiary Company/Companies participate in the BR initiatives of the parent Company ? If yes, then indicate the number of such subsidiary Company(s)</b>
	The subsidiary companies operate in different jurisdictions and are engaged in their own BR initiatives as applicable to them.
3.	<b>Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company ? If yes, then indicate the percentage of such entity/entities ? [Less than 30%, 30-60%, More than 60%]</b>
	NA

**Section D : BR Information**
**1. Details of Director/Directors responsible for implementation of the BR policy/policies**

Implementation of BR policies is the responsibility of Ms. Ekta Maheshwari, Whole-Time Director, CFO & Company Secretary (DIN : 02071432 )

**2. Principle-wise (as per NVGs) BR Policy/policies (Reply in Y/N)**

S. N.	Questions	Principle1	Principle2	Principle3	Principle4	Principle5	Principle6	Principle7	Principle8	Principle9
		Ethics, transparency & Sustainability, accountability	Sustainability in life-cycle of products	Employee well-being	Stakeholder engagement	Promotion of human rights	Environmental protection	Responsible public policy advocacy	Inclusive growth	Customer value
1	Do you have a policy/policies for	Yes	NA	Yes	Yes	Yes	NA	No	Yes	NA
2	Has the policy been developed in consultation with relevant stakeholders ?	Yes	NA	Yes	Yes	Yes	NA	NA	Yes	NA
3	Does the policy conform to any national/ international standards? If yes, specify.	No	NA	No	No	NA	NA	NA	NA	NA
4	Has the policy been approved by the Board ? If yes, has it been signed by MD/owner/CEO/ appropriate Board Director	No	NA	No	Yes	No	No	NA	No	NA
5	Does the Company have a specified Committee of the Board/ Director/ Official to oversee the implementation of the policy?	Yes	NA	Yes	Yes	Yes	Yes	NA	Yes	NA
6	Indicate the link for the policy to be viewed online #	Partial 1. Code of Conduct for Directors & Sr. Management Personnel 2. Whistleblower Policy 3. Code of Prevention of Insider Trading	NA	No	Yes 1.Dividend Distribution Policy 2. Code of Conduct	No 1.Policy against Sexual Harassment 1.Whistleblower Policy	No	NA	NA	NA
7	Has the policy been communicated to the relevant internal and external stakeholders ?	Yes	NA	Yes	Yes	Yes	Yes	NA	Yes	NA
8	Does the Company have an in-house structure to implement the policy ?	Yes	NA	Yes	Yes	Yes	Yes	NA	Yes	NA

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		Ethics, transparency & Sustainability, accountability	Sustainability in life-cycle of products	Employee well-being	Stakeholder engagement	Promotion of human rights	Environmental protection	Responsible public policy advocacy	Inclusive growth	Customer value
9	Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/policies ?	Yes	NA	Yes	No	Yes	Yes	NA	No	NA
10	Has the Company carried out Independent audit/evaluation of the working of this policy by an internal or external agency ?	No	NA	NA	No	NA	Yes	NA	No	NA

**2A if answer to S. No. 1 against any principle, is 'No', please explain why : (Tick upto 2 options)**

S. No.	Question	Principle 2 : Sustainability in life-cycle of products	Principle 7 : Responsible public policy advocacy	Principle 9 : Customer value
1.	The Company has not understood the Principles			
2.	The company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles			
3.	The company does not have financial or manpower resources available for the task			
4.	It is planned to be done within next 6 months			
5.	It is planned to be done within the next 1 year			
6.	Any other reason (please specify)	KAMA Holdings Limited is a Core Investment Company engaged in Holding long term investments in the shares of Subsidiaries. Thus this is not applicable to the Company.	KAMA is a member of various industrial and trade bodies. We actively participate in these forums on issues and policy matters that impact the interest of our stakeholders. We prefer to be a part of the broader policy development process through making representations to Chambers of Commerce, giving our comments on the proposed amendments in the relevant legislations and being a part of discussions with the representatives of the relevant authorities in open forums. Hence, we do not feel such a policy is necessary for us.	KAMA Holdings Limited is a Core Investment Company engaged in Holding long term investments in the shares of Subsidiaries. Thus this is not applicable to the Company.

### 3. Governance related to BR

Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year

The Board of Directors discuss the BR performance annually..

**Does the Company publish a BR or a Sustainability Report ? What is the hyperlink for viewing this report ? How frequently it is published ?**

The financial year 2018-19 is the first year for which the provisions of Business Responsibility Reporting of the Listing Regulations are applicable to the Company.

#### **Section E : Principle-wise performance**

##### **Principle 1**

**1. Does the policy relating to ethics, bribery and corruption cover only the company? Yes/ No. Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/NGOs /Others?**

Our people's integrity and fairness in organisational and business dealings is of utmost importance to all in KAMA Holdings Limited. As a responsible and leading organization, KAMA does its business with utmost integrity. This is exemplified in our Values which are not just strong words. Not just a theory but a way of life. It's a collection of habits that should be reflected in our day-to-day behaviour. We have the following policies in place which form the foundation of our Company's commitment towards ethical conduct at all levels :

- Code of Conduct : KAMA has its Code of Conduct which is applicable to all the employees of the Company including the employees of the subsidiaries. It does not extend to the suppliers/contractors/NGOs etc. It is a must for every employee in all of the business units/subsidiaries to follow the values enshrined in the Code of Conduct in their day to day activities. All employees have to read and understand this Code and abide by it.
- Whistle-Blower Policy : This Policy is applicable to the Directors of the Company or a person who is in direct or indirect employment with the company who makes a protected disclosure under this policy. This Policy provides a platform to these stakeholders for making any communication made in good faith that discloses or demonstrates evidence of any fraud or unethical activity within the company and had provisions to ensure protection of the whistleblower against victimization for the disclosures made by him/her.

**2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the Management ?**

During the reporting period, no complaint was received under the provisions of Whistle-Blower Policy.

##### **Principle 2**

**1. List upto 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.**

KAMA Holdings Limited is a Core Investment Company engaged in Holding long term investments in the shares of Subsidiaries.

**2. Does the Company have procedures in place for sustainable sourcing (including transportation) ? If yes, what percentage of your inputs was sourced sustainably ? Also, provide details thereof, in about 50 words or so.**

NA

**3. Has the Company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work ?**

**If yes, what steps have been taken to improve their capacity and capability of local and small vendors?**

NA

**4. Does the Company have a mechanism to recycle products and waste ? If yes, what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%).**

NA

**Principle 3**
**1. Please indicate the total number employees.**

Permanent employees 1

**2. Please indicate the total number of employees hired on temporary/contractual/casual basis**

Temporary/contractual/casual basis NIL

**3. Please indicate the number of permanent women employees**

NIL

**4. Please indicate the number of permanent employees with disabilities**

NIL

**5. Do you have an employee association that is recognized by Management ?**

NA

**6. What percentage of your permanent employees is Members of this recognized employee association ?**

0%

**7. Please indicate the Number of complaints relating to child labour, forced labour, involuntary labour, sexual harassment in the last financial year and pending, as on the end of the financial year**

S. No.	Category	No. of complaints filed during the Financial Year	No. of complaints pending as at end of the Financial Year
1.	Child labour/forced labour/involuntary labour	0	0
2.	Sexual harassment	0	0
3.	Discriminatory employment	0	0

**8. What percentage of your under mentioned employees were given safety & skill up-gradation training in the last year?**

a.	Permanent Employees	100%
b.	Permanent Women Employees	NA
c.	Casual/Temporary/Contractual Employees	NA
d.	Employees with Disabilities	NA

**Principle 4**
**1. Has the company mapped its internal and external stakeholders? Yes/No**

Yes, KAMA has mapped its internal and external stakeholders. We recognise employees, communities surrounding our operations, business associates, shareholders and regulatory authorities as our key stakeholders.

**2. Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders.**

No

**3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.**

No

**Principle 5**
**1. Does the policy of the company on human rights cover only the company or extend to the Group/Joint Ventures /Suppliers /Contractors /NGOs/Others?**

We have the Code of Conduct and Whistleblower Policy which covers issues related to human rights. The details of these two policies have been covered elsewhere in this Report. We do not deal with any supplier/contractor if it is in violation of human rights and we do not employ any person below the age of eighteen.

The said policies discourage violation of values stated therein and provide a fair and transparent mechanism for reporting any such violation. The Whistleblower Policy investigates the disclosure made by the Whistleblower and recommends disciplinary or corrective action based on the outcome of the investigation. This policy also provides direct access to the Chairman of the Audit Committee in appropriate and exceptional cases. The system is designed to ensure confidentiality and protect the complainant from being victimized. False allegations are also dealt with disciplinary action in accordance with the Policy. A quarterly report of the summary of disclosures received and action recommended/taken to the Audit Committee on a quarterly basis.

Any amendment or modification in the Whistleblower Policy would be approved in writing by the Chairman of the Company and would be placed before the Audit Committee for its noting.

**2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?**

No complaint was received pertaining to human rights violation during the past financial year.

**Principle 6**

**1. Does the policy related to Principle 6 cover only the company or extends to the Group/Joint Ventures/ Suppliers/Contractors /NGOs/others.**

NA

**2. Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc? Y/N. If yes, please give hyperlink for webpage etc.**

NA

**3. Does the company identify and assess potential environmental risks? Y/N**

NA

**4. Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?**

NA

**5. Has the company undertaken any other initiatives on clean technology, energy efficiency, renewable energy, etc. Y/N. If yes, please give hyperlink for web page etc.**

NA

**6. Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?**

NA

**7. Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.**

NA

**Principle 7**

**1. Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with:**

No

**2. Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas ( drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)**

No

**Principle 8**

1. **Does the company have specified programmes/initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof.**

The provisions of Companies Act pertaining to CSR are not applicable to the Company.

2. **Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?**

NA

3. **Have you done any impact assessment of your initiative?**

NA

4. **What is your company's direct contribution to community development projects- Amount in INR and the details of the projects undertaken.**

NA

5. **Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.**

NA

**Principle 9**

1. **What percentage of customer complaints/consumer cases are pending as on the end of financial year.**

NIL

2. **Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. /Remarks(additional information)**

NA

3. **Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.**

No

4. **Did your company carry out any consumer survey/ consumer satisfaction trends?**

NA