



**SCAN STEELS LIMITED**

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## **CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY OF SCAN STEELS LIMITED**



## **Corporate Social Responsibility (CSR) Policy of Scan Steels Limited**

Corporate Social Responsibility is strongly connected with the principles of Sustainability; an organization should make decisions based not only on financial factors, but also on the social and environmental consequences. Therefore, it is the core corporate responsibility of Scan Steels Limited to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

Scan Steels Limited recognizes that its business activities have wide impact on the societies in which it operates, and therefore an effective practice is required giving due consideration to the interests of its stakeholders including shareholders, customers, employees, suppliers, business partners, local communities and other organizations. The company endeavors to make CSR a key business process for sustainable development. Scan Steels Limited is responsible to continuously enhance shareholders wealth; it is also committed to its other stakeholders to conduct its business in an accountable manner that creates a sustained positive impact on society. Our company is committed towards aligning with nature; and has adopted eco-friendly practices.

As a corporate entity, the company is committed towards sustainability. Ongoing dialogues with shareholders provide valuable approach with an objective that each business decision takes into account its social and environmental impacts and plans.

### **DEFINITIONS**

**“Act”** means the Companies Act, 2013, as amended from time to time.

**“Board”** means the Board of Directors of the Company.

**“Company”** means ‘Scan Steels Limited’.

**“Corporate Social Responsibility” (CSR)** means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provision contained in the CSR rules.

**“CSR Committee”** means Corporate Social Responsibility Committee of the Company constituted by the Board as per section 135 of the Act.

**“CSR Rules”** means Companies (Corporate Social Responsibility Policy) Rules 2014 and amendments thereon.

**“CSR Policy”** means this policy containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

**“CSR Expenditure”** shall include all expenditure on activities mentioned in Sch VII, or for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee.



**“Net profit”** shall have the meaning prescribe to it in the Act excluding any profit arising from any branches of the company, whether operated as a separate company or otherwise; and any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act

**“NGO”** means non-governmental organization.

**“Ongoing Project”** means a multi-year project undertaken by a company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.

**“Administrative Overheads”** means the expenses incurred by the company for ‘general management and administration’ of corporate social responsibility functions in the company, but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular corporate social responsibility project or programme;

**“Impact Assessment” evaluation** of how well a company has integrated the principles of CSR into their business.

### THE PHILOSOPHY

All CSR activities shall be driven by the core value of Inclusion. Scan Steels shall ensure that all developmental activities/ initiatives undertaken are accessible to the most marginalized segments such as children, women, elderly and those with disabilities. This would reflect particularly in the field of education, healthcare, sanitation, community welfare, skill development, employment generation, sustainable livelihoods, infrastructure development, promotion of national heritage & culture etc.

Though the Group stands tall in the corporate world, with high ranking in terms of various parameters, Scan Group believes that the true and full measure of growth, success and progress lies beyond balance sheets or conventional economic indices. It is best reflected in the difference that business and industry make to the lives of people. Through its social investments, Scan Group addresses the needs of communities residing in the vicinity of its facilities, taking sustainable initiatives in the areas of health, education, environment conservation, infrastructure and community development and response to natural calamities.

### PREAMBLE

The Policy outlines the company’s responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking activities for welfare & sustainable development of the community at large. we try to contribute for social and economic development on regular basis. We believe that to succeed, an organization must maintain highest standards of corporate behaviour towards its employees, consumers and societies in which it operates.



We are of an opinion that CSR underlines the objective of bringing about a difference and adding value in our stakeholder's lives.

The core elements of CSR are the continuing commitments by business to ethical principles, protection of human rights, care for the environment while improving the quality of life of all the stakeholders including the local community and society at large.

It is Company's conscious strategy to design and implement Social Investments/CSR programs, by enriching value chains that encompass the disadvantaged sections of society, especially those from local areas in nearby villages where companies' plants are located, through economic empowerment based on grass-root capacity building.

This Policy shall apply to all CSR initiatives and activities taken up at various work centers and locations of the company, for the benefit of different segments of the society, specifically the deprived, under privileged and differently abled persons.

### **GOVERNANCE**

Corporate bodies' involvement in CSR activities is not a new concept in India. Industrial majors are engaged in social development activities since long back. However, the Companies Act, 2013 has brought it under the legal purview. The concept of CSR is introduced through "Comply-or- Explain" mandate which was later on Amended as "Comply or Penalized". It mandates qualifying companies to constitute Corporate Social Responsibility Committee to effectively monitor CSR activities of the Company. This CSR Policy shall operate as the Corporate Social Responsibility Policy of the Company As per Section 135 of the Companies Act, 2013 and the rules made thereunder including the Companies (Corporate Social Responsibility Policy) Rules 2014("CSR Rules") and amended as per Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 and Companies (Corporate Social Responsibility Policy) Amendment Rules, 2022 which lays down the framework and modalities for carrying out CSR activities which are specified in Schedule VII of the Act.

### **POLICY STATEMENT**

The CSR Policy focuses on addressing critical social, environmental and economic needs of the marginalized/underprivileged sections of the society aligned with the CSR activities which are specified in Schedule VII of the Act. We adopt an approach that integrates the solutions to these problems into the strategies of the company to benefit the communities at large and create social and environmental impact.



## PURPOSE

The key purpose of this policy is to:

- Define what CSR means to us and the approach adopted to achieve the same
- Define the kind of projects/activities that will come under the ambit of CSR
- Identify broad areas of intervention in which the company will undertake projects
- Serve as a guiding document to help execute and monitor CSR projects
- Explain the manner in which the unspent amount/surpluses/excess from CSR projects will be treated.

## SCOPE OF CSR ACTIVITIES IN SCAN STEELS

The Company has constituted a committee to undertake CSR activities within the purview of the guidelines as provided by the Ministry of Corporate Affairs including Schedule VII of the Companies Act, 2013, as amended from time to time, and Company will undertake any activity as specified therein as its CSR Projects which inter alia provides the following:

- (i) eradicating hunger, poverty and malnutrition, promoting health care including 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 and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- (iv) 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 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; Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- (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 Prime Minister's Central Assistance and Relief in Emergency Situations Fund (PM CARES 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) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and (b) 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 Defense Research and Development Organisation (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)]
- (x) rural development projects;
- (xi) slum area development;
- (xii) disaster management, including relief, rehabilitation and reconstruction activities.

### **DISQUALIFYING ACTIVITIES FOR CSR**

- a. The CSR Rules disqualifies the CSR projects and programs that are implemented by the Company for benefit of the employees of the Company and their families.
- b. The CSR activities implemented outside India (Except for training of Indian sports personnel representing any state or union territory at national or international level)
- c. Any amount directly or indirectly contributed towards any political party under Section 182 of the Act.
- d. Activities that are undertaken by the Company in pursuance of its normal course of business.
- e. Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services
- f. activities carried out for fulfilment of any other statutory obligations under any law in force in India.

The CSR activities shall be undertaken within the territory of the Republic of India.

Pursuant to Schedule VII of the Act and the CSR Rules, the Company shall undertake CSR activities included in its Annual CSR Plan, as recommended by the CSR Committee at the beginning of each year.



The Committee can recommend to Board any modification to the existing Annual CSR Plan or to propose any new program during the financial year under review.

## **CSR COMMITTEE**

- The CSR policy and programs shall be implemented, managed and supervised by the CSR committee appointed by the Board.
- The CSR Committee shall comprise at least of such number of directors as is mandatorily required by applicable laws.

Our CSR governance structure will be headed by the Board Level CSR Committee that will be ultimately responsible for the CSR projects undertaken, Members of which are: (composition shall be disclosed in the Board Report as per section 134(3) and on the Website of the Company)

### **A) Members**

1. Shri Vinay Goyal - Chairman (up to 04.06.2021) (Independent Director)
2. Shri Shравan Agarwal - Chairman (w.e.f 15.06.2021) (Independent Director)
3. Shri Punit Kedia - Member (Independent Director)
4. Shri Ankur Madaan - Member (Whole Time Director)

### **B) Responsibilities:**

- Recommend to the Board objective of Corporate Social Responsibility (CSR) to generate conducive environment to conduct the business in a socially responsible manner and to carry on business activities in the ethical way with regards to legal obligations and commitments;
- Formulate and update CSR Policy, and recommend to the Board for their Approval.
- Decide the CSR activities to be taken up by the Company and areas of Implementation in accordance with this Policy and Sch vii of the CA, 2013; and annually recommend to the Board for its approval.
- Recommend the CSR expenditure and decide the amount to be allocated for each project or activity to the Board of the Company who will approve it.
- Identify Potential Partner and facilitate and end to end partner selection.
- Timely review of the budgets and approved disbursements to the partners (if any)
- Suggest areas of intervention to the Board of the Company.
- The Annual Action Plan is a yearly plan of CSR activities that would be placed before the Board of Directors of the Company based on recommendation of its CSR Committee which outlines inter alia the following aspects of CSR initiatives of the Company:
  - the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act
  - Manner of Execution of such projects or programs
  - Modalities of Utilization of funds and Implementation schedules for projects.





- Put monitoring mechanisms in place to track the progress of each activities/project rolled out under this Policy, utilization of funds disbursed and submit a report, to the Board on all CSR activities undertaken during the financial year.
- Details of need and Impact Assessment if any for the projects undertaken by the company.
- Identify Risk Assessment factor
- Periodically visit the programmes and evaluate the progress on ground and share reports about the same with the Board.
- Recommend the Board modalities and manner for the transfer of ownership of Capital Assets, if created or acquired, through CSR spending;
- The Committee shall meet at least twice in a financial year, or as per the need to Implement and monitor the activities taken.
- Such other functions as directed by the Board of Directors.

### ROLE OF THE BOARD

- After taking into account the recommendations made by the CSR Committee, approve the CSR Policy and Annual Action Plan for the Company (which shall be disclosed in the Board Report and placed on website of the Company).
- Ensure that the CSR activities included in this Corporate Social Responsibility Policy are undertaken by the Company as per the decided Time Lines/year-wise allocations.
- Board may alter such plan at any time during the financial year, as per the recommendation of its CSR committee, based on the reasonable justification to that effect.
- The board of the company may decide to undertake its CSR activities in **collaboration with** other companies for undertaking projects or programmes in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes.
- The board of the company may decide to undertake its CSR activities approved by the CSR Committee, by itself or through: (a) a 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; or (b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or (c) any entity (a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act) established under an Act of Parliament or a State legislature; or (d) a 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





- it shall have an established track record of three years in undertaking similar programs or projects or activities.
- every entity above, who intends to undertake any CSR activity, shall register itself with the central government by filing the form CSR-1 electronically with the registrar, with effect from the **01<sup>st</sup> day of April 2021**.
- a due diligence process will be initiated to evaluate organization's operations, programmes and statutory compliances before making any decisions for partnership opportunities.
- In case CSR amount spent by the company for creation or acquisition of a Capital Asset Board must ensure that it should be held by (A) a company established under section 8 of the act, or a registered public trust or registered society, having charitable objects and CSR registration number or (b) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or (c) a public authority as per section 2(h) of RTI act 2008
- Ensure that in each financial year the Company spends at least 2% of the average net profits of the company made during the three immediately preceding financial years, calculated in accordance with Section 198 of the Act, in pursuance of its CSR policy.
- The board of a company shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it (as per CFO certification).
- Ensure that administrative overheads shall not exceed five percent of total CSR expenditure of the company for that financial year.
- Ensure Compliance related to Surplus arising out of CSR / Excess amount spent and Unspent amount ongoing project if any.
- where the amount to be spent by a company does not exceed fifty lakh rupees p. @, the requirement for constitution of the corporate social responsibility committee shall not be applicable and the functions of such committee provided under this section shall, in such cases, can be discharged by the board of directors of the company.
- Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the Company where it operates,
- In case of ongoing project, board will monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- Impact Assessment Reports shall be placed before the Board.
- The board's report pertaining to any financial year shall include an annual report on CSR containing particulars specified in annexure ii of CSR Amendment Rules 2021.

### CSR FUNDS

The Expenditure for the purpose of carrying on the CSR activities would include the followings:

- 2% of the average Net Profit (excluding Dividend received from other companies in India which covered under and complying with the provisions of Section 135 of the Act.) made by the Company during immediately preceding three Financial Years.
- any income arising there from
- surplus arising out of CSR activities carried out by the company and such surplus will not be part of business profit of the company.



- Administrative overheads shall not exceed 5% of total CSR expenditure of the company for that financial year
- Determination of whether a particular expense fall within this 5% cap can be decided in consultation of the Chief Financial Officer of the Company based on the clarification available from time to time in this regard.

## **CSR EXPENDITURE**

### **1. ANY AMOUNT REMAINING UNSPENT PURSUANT TO ANY ONGOING PROJECT**

- Will be transferred by the company within a period of thirty days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the unspent corporate social responsibility account and such amount shall be spent by the company in pursuance of its obligation towards the corporate social responsibility policy within a period of three financial years from the date of such transfer,
- after 3 years, failing which, the company shall transfer the same to any fund specified in schedule vii, within a period of thirty days from the date of completion of the third financial year.
- Other than on-going projects any unspent amount of CSR for that F.Y will be transferred to any fund specified in schedule vii, within a period of six months of the expiry of the financial year”

### **2. SPENT IN EXCESS OF THE REQUIREMENTS**

if the company spends an amount in excess of the requirements, company may set off such excess amount against the requirement to spend up to immediate succeeding three financial years subject to the conditions that –

- the excess amount available for set off shall not include the surplus arising out of the CSR activities.
- the board of the company shall pass a resolution to that effect.

### **3. SURPLUS ARISING OUT OF CSR ACTIIVITES**

- shall not form part of the business profit of a company
- and shall be ploughed back into the same project
- or shall be transferred to the unspent CSR account and spent in pursuance of CSR policy and annual action plan of the company
- or transfer such surplus amount to a fund specified in schedule vii, within a period of six months of the expiry of the financial year.



**FINANCIAL OUTLAY AND IMPLEMENTATION FOR CSR ACTIVITIES**

- The CSR Committee will be responsible for overseeing, execution, implementation and monitoring of the Project.
- These Programs will be executed by the Company using internal resources after conducting detailed due diligence, to execute projects at the ground, at different levels there will be mobilization, set eligibility criteria for beneficiary selection, screening and assessments, virtual interviews, Monthly/quarterly/half yearly reporting, cross reference communication with the beneficiaries, systematic record keeping/documentation, monitoring and field visits and fixed Timeline to Execute each activity.
- The Company may also collaborate with other Companies for undertaking CSR activities or through any trust, society, or company not established by the Company after ensuring compliances as per CSR Rules.
- Every year, the Company shall with the approval of its Board make a budgetary allocation for CSR activities/ projects for the year. The budgetary allocation will be based on the profitability of the Company and the requirements of applicable laws.
- Utilization of the contribution given to CSR committee shall be certified by a CFO of Scan Steels. Upon verification of the utilizations, Scan Steels shall extend further advance after the advance given earlier has been deployed.
- For certain projects reimbursement model will be followed. The funds will be disbursed after a financial assessment of the expenses incurred. For the remaining projects, the funds will be directly disbursed to beneficiaries with the approval of the CSR Committee & Board.
- Fund will be disbursed in phase/tranche wise depending on the nature of the project. On the basis of the expenses incurred & the submission of the relevant supporting of the expenses, i.e. bills, receipts, invoices, bank statements, etc. respective amount will be disbursed at different intervals- quarterly & half-yearly.
- Scan Steels shall also be conducting audits on its contributions as possible periodically.
- The Company expects to spend the budgeted amount allocated for CSR activities/ projects planned for each financial year, within that year which will be annually reviewed and renewed on the basis of the project performance.
- The CSR Committee and the Board of Directors will disclose the reasons for not being able to spend the entire budgeted amount on the CSR activities as planned for that year and comply with the Provisions of the applicable Laws accordingly.
- Company may Obtain professional advice from external sources for the purpose of accomplishment of overall CSR objectives laid down under the Act and aligning it with the Mission of the company;



- The CSR Activities would be implemented by the Company by taking in to account following key point:
  - Project Proposals
  - Targeted Beneficiaries and their key needs
  - Alignment with Schedule VII
  - Project Goals and milestones
  - Activities and Timelines including expected closure dates
  - CSR Budget with projections
  - build CSR capacities of own personnel or of implementing agencies and to take measures to involve the employees in CSR activities of the company
  - fair, transparent, accountable Monitoring mechanism
  - Progress reporting and frequency of reports
  - Risks and mitigation strategies
  - Any other information as may be required by the CSR Committee.

### **MONITORING FRAMEWORK**

- The Company recognizes that monitoring is critical for assessment of the progress as regards to timelines, budgetary expenditure and achievement of targets. Monitoring maybe done periodically with the help of identified key performance indicators, which will differ on the basis of the nature of the project and will be monitored & evaluated as per the objectives & deliverables set for respective projects.
- CSR Committee / specifically Chairman of the Committee shall meet the target group of their respective programs and stakeholders on a regular basis and shall carry out the monitoring of CSR activities at different intervals through field visits, monthly calls, reporting, cross reference communication etc. by ensuring adequate measurable Key Performance Indicators in each program and provide independent feedback to the Management, wherever required.
- each project shall include well-defined timeline & parameters, CSR team shall also do internal review from time to time and evaluate the progress of each of the programs.
- Analyse governance framework and identify the gaps in the light of company's Mission and make continuous improvement in Governance Framework for CSR activities of the company;
- Monitoring will be done in project mode with continuous feedback mechanism, and recourse always available for mid-course correction in implementation, whenever required.
- The performance of the Company's CSR activities would be monitored on the basis of their achievement of annual targets and the utilization of their annual budgets for the activities planned and the targets set for each year.



- Implementation and monitoring of the CSR activities will be overseen by the CSR Committee as per the Annual Action Plan. To ensure that the objectives of CSR Policy are being met in an efficient and effective manner, at operational Level Quarterly/Half Yearly inputs (as per Each Activity) and at the Strategic Level - Annual implementation review by CSR Committee be done and At the Management Level Annual review by Board and review by CSR committee twice a year.
- the utilisation of the amount sanctioned towards CSR Activities should be reported by the Implementation Group (if any) through Utilization Certificate with a statement of expenditure duly certified by a Practicing Chartered Accountant/Authorized Auditor of the Organization/ Institution to whom CSR fund is allocated to the CSR Committee & Board OR if the Company spends Directly on the CSR projects, then by the CSR Committee (CFO certified ) to the Board on a Quarterly/Half Yearly basis as per the need and on annual basis to identify any surplus, unspent or carry forward amount with regards to CSR activities of the company in such manner as the Board may direct.
- In the event any of the CSR Activities are undertaken through an Implementing Agency, the CSR Committee should obtain relevant information from the Implementing Agency as per the set Due Diligence and ensure that the progress on such CSR Activity is submitted to the Board on a monthly basis or Quarterly Basis Depending upon the Project, in such a manner as the Board may direct.
- Upon receipt of progress report by the Implementation Group (if any), the CSR Committee may review and deliberate upon such reports and provide such inputs or recommendations, as it may deem necessary, to the Board.
- Notwithstanding anything to the contrary, the Board shall not be obliged to comply with the recommendations of the CSR Committee.
- The Company shall monitor a project after its completion, by comparing the details of the expenses made on the project with the budget allocated towards that project and Evaluate actual CSR performance and impact such activities are making on the people, society and environment;
- Corrective measures to be taken to rectify deviations (if any)

### **CSR REPORTING**

- The board's report pertaining to any financial year shall include an annual report on CSR containing particulars specified in annexure II of CSR (Amendment Rules) 2021.

- The Board shall seek a short progress report from the CSR Committee as per the Need of the Activity/Project.

- Other Quarterly / Half Yearly and Annual/Closure report would indicate:

1. Achievement since last progress report / during the last quarter in terms of coverage compared to the target and reasons for variance.



2. Achievement of the year-to-date in terms of coverage compared to the target, plans to overcome shortfalls if any and support required from the CSR Committee/Board to overcome the shortfalls.
3. Actual year-to-date spends compared to the budget and reasons for variance.
4. In respect of activities undertaken through outside Trust/Society/NGO's etc. there will be mechanism of monthly/Quarterly/Half Yearly and Annual reporting of progress (depending upon the Project / activities) on each such activities and the amount incurred thereon.
5. In order to track the proper utilization of funds, where applicable, at different intervals of the project, CSR teams will collect & cross-check financial documents like invoices, bills & receipts, bank statements, Fund Utilization Certificate, etc.

**Chief financial officer** shall certify to the effect that funds are utilized as approved by the board.

### **IMPACT ASSESSMENT**

**Company will undertake Impact Assessment under the following conditions:**

- If having average CSR obligation of 10 crore rupees or more in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of CSR projects having outlays of 1 crore rupees or more.
- And which have been completed not less than one year before undertaking the impact study.
- book the expenditure towards CSR for that financial year, which shall not be more than 2% of the total CSR expenditure for that financial year or 50 lakh rupees, whichever is higher.
- The impact assessment reports shall be placed before the board and shall be annexed to the annual report on CSR.

### **GENERAL**

In case of any doubt with regard to any provision of this CSR Policy and also in respect of matters not covered herein, a reference should be made to the CSR Committee. In all such matters, the interpretation and decision of the CSR Committee shall be final.

All provisions of the CSR Policy would be subject to revision/amendment in accordance with the applicable laws.

The Company reserves the right to modify, cancel, add, or amend this CSR Policy.



Minimum 2 (Two) members shall constitute a quorum for the committee meeting.

Proceedings of all meetings must be signed by the Chairman of the Committee and tabled at the subsequent Board and Committee meeting.

**DISCLOSURE OF THE POLICY**

The CSR policy as recommended by the CSR Committee and approved by the Board shall be displayed on the Company's website along with the Projects and Activities (Annual Action plan) Approved by the Board and shall be disclosed in the Board's report as well.

**REVIEW OF THE POLICY**

The CSR Committee shall review the CSR Policy from time to time based on the changing needs and make suitable modifications as may be necessary with the approval of the Board. (Last amended as per CSR AmendmentRules\_22092022 on 13.05.2023)

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