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STAHL

Corporate Social Responsibility Policy

This Corporate Social Responsibility Policy (“the CSR Policy”) has been framed by Earthstahl and Alloys Limited (the Company) in accordance with the Section 135 and Schedule VII of the Companies Act, 2013 and CSR Rules issued by Ministry of Corporate affairs from time to time.

Unless the context otherwise provides, the definitions mentioned in the Companies Act, 2013 and further amendments from time to time shall apply to this CSR Policy.

Company philosophy for CSR Policy:

Since its inception your Company has been a socially responsible corporate endeavoring to invest in the communities which go beyond any mandatory, legal and statutory requirements. The CSR policy furthers the philosophy of the Company and it is “*to practice sustainable business with a commitment to inclusive growth. It desires to be a catalyst in corporate arena while reflecting ethos, social values, remittance to society and transparency.*” By investing our CSR efforts in the prescribed domains of education, women empowerment, health & safety and environment, we further commit to build a fiduciary relationship with our stakeholders.

CSR Committee:

CSR Committee shall be formed as per the applicable laws and the Committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy. The CSR Committee shall submit periodical reports to the Board of Directors.

The composition of the Committee is as follows:-

S. No.	Name of Directors	Designation
1.	Mr. S.K. Jain	Independent Director
2.	Mr. Prawin Somani	Whole time Director
3.	Ms. Padma Somani	Whole time Director

Board of Directors of the Company may re-constitute the Committee as and when required to do so, by following the sections, sub-sections, rules, regulations, notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The Committee shall exercise powers and perform the functions assigned to it by the Board of Directors of the Company pursuant to section 135 of the Companies Act, 2013 and CSR Rules notified with regard thereto.

To effectively implement the Objectives of the Company with respect to CSR, the Committee is vested with the following functions and powers:

- a. Formulate, monitor and review periodically, CSR policy and recommend the same to the Board of Directors for approval;
- b. Formulate, monitor and review Annual action plan for recommend the same to the Board of Directors for approval;
- c. Approve to undertake CSR activities, if necessary, in collaboration with other Companies/firms/NGOs etc., and to separately report the same in line with the CSR rules;

d. Review and monitor spending of the allocated CSR amount on the CSR activities in accordance with the Act and the CSR rules;

e. Submit the Reports to the Board in respect of the CSR activities undertaken by the Company.

CSR Activities:

Pursuant to Schedule VII of the Companies Act, 2013, the Committee has approved the following activities as “CSR Activities” to be undertaken under the CSR policy of the Company. The scope of the activities will cover the following areas but not limited to the same and may extend to other specific projects/ programs as permitted under the law from time to time.

- Eradicating extreme hunger and poverty;
- Promotion of education;
- Promoting gender equality and empowering women;
- Reducing child mortality and improving maternal health;
- Combating human immunodeficiency virus, acquired immune deficiency syndrome, malaria and other diseases;
- Ensuring environmental sustainability;
- Employment-enhancing vocational skills;
- Social business projects;
- Contribution to the Prime Minister’s National Relief Fund or any other fund set up by the central government or the state governments for socio economic development and relief and funds for the welfare of the scheduled castes, scheduled tribes and other backward classes, minorities and women;
- Such other matters as may be prescribed.

Budget for CSR Policy:

1. As per provision of Companies Act, 2013 the Board shall ensure that the company has spent at least 2% of average net profit made during the three immediately preceding financial years.
2. CSR committee shall recommend the amount of expenditure project wise incurred annually to the Board for its consideration and approval.
3. CSR expenditure shall include all expenditure including contribution to corpus, for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act.

4. The administrative overheads should not exceed 5% of the total CSR expenditure of the company for the financial year.

Implementation:

The Board may decide to undertake its CSR activities approved by the CSR committee through:

1. The company; or
2. Collaboration with other companies in such manner that the CSR Committees of respective companies are in a position to report separately on such CSR activities in accordance with CSR Rules.

Monitoring of CSR policy:

CSR Committee shall monitor periodically the implementation of the projects / programs / activities undertaken by the Company and report to the Board on a regular basis the progress of CSR activities.

Conclusion:

The Board may review the policy from time to time based on changing needs and aspirations of the target beneficiaries and make suitable modifications, as may be necessary.