

JOTINDRA STEEL AND TUBES LIMITED **(CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY**

PREAMBLE:

The concept and need for Corporate Social Responsibility (CSR) has gained prominence from all avenues. The Government as well as regulators has framed various guidelines pertaining to responsibilities of business as well as the mandatory Corporate Social Responsibility provisions under the Companies Act, 2013. It is recognized that integrating social, environmental and ethical responsibilities into the governance of businesses ensures their long-term success, competitiveness and sustainability. This approach also reaffirms the view that businesses are an integral part of society, and have a critical and active role to play in the sustenance and improvement of healthy ecosystems, in fostering social inclusiveness and equity, and in upholding the essentials of ethical practices and good governance.

PURPOSE:

This policy sets out the Company's commitment & approach towards Corporate Social Responsibility. The Company is committed to improving the quality of life of the communities we serve through the CSR theme of 'Sustainable Development. The Company endeavors to facilitate livelihood opportunities & socio-cultural development in areas of its operations. The Company intends to be a significant contributor to CSR initiatives in India by devising and implementing social improvement projects for the benefit of underprivileged communities, towns and villages and the Policy envisages for the growth in and around the offices or factories of the Company. This policy, which encompasses philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful Programs for welfare & sustainable development of the community at large, is termed as the "CSR Policy".

FOCUS AREAS:

In accordance with the requirements of the Companies Act, 2013 ("the Act"), the Company's CSR programs shall mainly focus on the following areas:

JOTINDRA STEEL AND TUBES LIMITED shall identify any one or more of the following areas for its CSR activities:

- (i) Eradicating hunger, poverty and malnutrition, ["promoting health care including 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.

(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 art 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 recognized sports, Paralympic sports and Olympic sports

(viii) contribution to the prime minister's national relief fund [or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, 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 the 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 Organization (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.]

Preference shall be given to local area and areas around Jotindra Steel And Tubes Limited for spending the amount earmarked for CSR

CSR COMMITTEE:

As per the provisions of section 135(9) which provides that Where the amount to be spent by a company under section 135 sub-section (5) does not exceed fifty lakh rupees, the requirement for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee shall, in such cases, be discharged by the Board of Directors of such company.

So the Constitution of CSR Committee for Jotindra Steel and Tubes Limited is not required as the amount which is to be spent by the company does not in any case exceeds 50 Lakhs Rupees so the functions of the CSR committee shall be accomplished by the Board of Directors of Jotindra Steel and Tubes Limited, the functions includes-

- To formulate and recommend to the Board, a corporate social responsibility policy which will indicate the activities to be undertaken by the Company in accordance with Schedule VII of the Companies Act, 2013;
- To review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the Company;
- To monitor the corporate social responsibility policy of the Company from time to time;

Any other matter as the Corporate Social Responsibility Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors from time to time pursuant to the provisions of Section 135 of the Companies Act and rules in relation thereto, as amended from time to time.

RESPONSIBILITY OF THE BOARD OF DIRECTORS:

The Board shall be responsible for –

- Approving the CSR policy of the Company subject to necessary changes/modifications as the Board may deem fit.
- Ensuring that in each financial year the Company spends such amounts for CSR activities as may be decided by the board.
- Ensuring that the activities as are included in the CSR Policy are undertaken by the Company.

COMPANY CSR BUDGET:

The amounts to be spent by the Company shall be approved by the board considering the stipulations under the Act, as amended from time to time (presently 2% of the average net profits of the Company for the preceding three financial years). Any surplus arising out of the CSR projects or programs or activities shall not form part of business profits of the Company.

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 with the CSR Policy.

IMPLEMENTATION & MONITORING STRUCTURE:

CSR Programs of the company shall be undertaken through a three-tier structure:

- Company level employees take up implementation of key initiatives, in association with like-minded partners in consultation with the management.
- Cross-functional CSR committee at corporate level helps initiate projects and provides support & monitoring.
- Directors provides broad direction for CSR planning to ensure desired impact.

Project Monitoring

- The Board will ensure that the CSR Policy is implemented as per the Act and the Rules ensuring that all projects as budgeted are duly carried out.
- All CSR spends will be closely monitored and audited in an accountable and transparent manner
- Project monitoring shall include periodic field visits, comprehensive documentation, and if required interaction with beneficiary communities.
- The Board shall periodically review the CSR project reports and the same shall be annually presented to the Board.

STAKEHOLDER COMMUNICATION:

We shall ensure relevant updates regarding our key projects and its impact through our Annual Report, and other relevant mechanisms from time to time.

PROJECTS UNDERWAY:

Our proposed CSR Activities are appended below:

- 1. Eradication of Hunger, Poverty and Malnutrition and promotion of health:**
Eradicating hunger, poverty and malnutrition, promoting health care activities including preventive health care and sanitation and making available safe drinking water to the villages preferably in the vicinity of the offices or factories. The Company is also planning to expand its CSR project to other places.

GENERAL

In case of any doubt with regard to any provision of the policy and in respect of matters not covered herein, a reference to be made to the Board. In all such matters, the interpretation & decision of the Board of Directors shall be final. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from Government, from time to time. Jotindra Steel And Tubes Limited reserves the right to modify, add, or amend any of these Policy Rules/Guidelines.