

KAMDHENU ISPAT LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

A. INTRODUCTION

Kamdhenu Ispat Limited CSR Policy is inspired by the words of its founder Shri Satish Kumar Agarwal who said "What is that life worth which cannot bring comfort to others". While pursuing our business strategy of introducing products that give our consumers safety, reliability and satisfaction, Kamdhenu operates in a manner that not just continues to strengthen the wealth of the Company as well as of the shareholders, but also lending a helping hand to the community.

B. OUR CSR VISION

Through sustainable measures, actively contribute to the Social, Economic and Environmental Development of the community in which we operate ensuring participation from the community and thereby create value for our nation.

C. OUR CSR MISSION

Ensuring socio-economic development of the community through different participatory and need-based initiatives in the best interest of the poor and deprived sections of the society so as to help them to become **SELF-RELIANT** and build a better tomorrow for themselves.

D. OUR ACTIVITIES

The CSR activities we pursue will be in line with our stated Vision and Mission, focused not just around our plants and offices, but also in other geographies based on the needs of the communities. The focus areas where special Community Development programs would be run:

- 1) Eradicating hunger, poverty and malnutrition, promoting preventive health care and 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 centers 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, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;

- 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, paralympic 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; and
- 10) Employing people and incurring other costs to carry out aforesaid activities. Such other activities as the Board may consider appropriate in this regard.

E. OUR APPROACH TO IMPLEMENTATION

Kamdhenu will undertake CSR activities as approved by CSR Committee through itself or its foundation KAMDHENU JEEVANDHARA established by the Company. The Company can also undertake the CSR activities through other eligible entities exclusively or in partnership with other eligible entities.

F. CSR THROUGH REGISTERED TRUST, SOCIETY, OTHERWISE

The Board of Directors of the Company may decide to undertake CSR activities approved by the CSR Committee 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 otherwise provided that:

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

G. CSR FUNDS

The corpus for the purpose of carrying on the aforesaid activities would include the followings:

- 1) 2% of the average Net Profit made by the Company during immediately preceding three Financial Years;

- 2) any income arising there from;
- 3) surplus arising out of CSR activities carried out by the company and such surplus will not be part of business profit of the company; and
- 4) Donations received from any sources.

H. APPOINTMENT/REMOVAL OF MEMBER OF CSR COMMITTEE

All members of the CSR Committee will be appointed by the Board and can be changed by the Board at its sole discretion. The Board shall from time to time vary the composition of the CSR Committee, its Role, Powers, Functions and Duties as may be required from time to time.

I. ROLE OF CSR COMMITTEE

- 1) Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Companies Act, 2013;
- 2) To constitute such sub-committees as it may deem appropriate to implement and execute the CSR activities;
- 3) To finalize the implementation schedule;
- 4) Recommend the amount of expenditure to be incurred on the activities; and
- 5) Monitor the Corporate Social Responsibility Policy of the company from time to time.

J. MONITORING

The CSR department will provide regular progress report to the CSR Committee of the Board. This 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; and
- 4) In respect of activities undertaken through outside Trust/Society/NGO's etc. there will be mechanism of monthly reporting of progress on each such activities and the amount incurred thereon.

The Board shall seek a short progress report from the CSR Committee on a quarterly basis.

K. NOT FOR EMPLOYEES ONLY

The CSR activities should not be for the benefit of employees of the Company or their family members.

L. CSR ACTIVITIES IN INDIA ONLY

Expenditure is to be made in respect of CSR activities done in India only.

M. AMENDMENTS

CSR Policy would be subject to revision/ amendment by the Board of Directors of the Company based on the recommendations of the CSR Committee or else in accordance with the guidelines on the subject as may be issued, from time to time.