

**ARDENT STEEL LIMITED**  
**CORPORATE SOCIAL RESPONSIBILITY**  
**(CSR) POLICY**

**1. SHORT TITLE & APPLICABILITY:**

- a. The policy lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large, is titled as the "**ASL CSR Policy**".
- b. This policy shall apply to all CSR initiatives and activities taken up at the various units and locations of ASL and other locations, for the benefit of different segments of the society, specifically the deprived, underprivileged and physically challenged persons.

**2. CSR VISION STATEMENT & OBJECTIVE:**

- a. In alignment with vision of the company, ASL, through its CSR initiatives, will continue to enhance value creation in the society and in the community in which it operates, through its services, conduct & initiatives, so as to promote sustained growth for the society and community, in fulfillment of its role as a **Socially Responsible Corporate**, with environmental concern.
- b. The objective of the **ASL CSR Policy** is to:
  - i. Directly or indirectly take up programmes that benefit the communities in & around its work places, over a period of time, in enhancing the quality of life & economic well-being of the local population.
  - ii. Generate through CSR initiatives, a community goodwill for ASL and help reinforce a positive & socially responsible image of ASL as a Corporate entity.
  - iii. Ensure an increased commitment at all levels in the organization, to operate its business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders.

### **3. CSR ACTIVITIES:**

- a. Corporate Social Responsibility (CSR) Activities means and includes, but is not limited to Projects or Programmes relating to the following activities specified in schedule VII to the Companies Act, 2013; or
- (i) eradicating malnutrition, promoting health care including preventive health care and sanitation and making available safe drinking water.;
  - (ii) promotion of special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
  - (iii) setting up homes and hostels for women orphans, setting up of 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 ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining quality of soil, air and water
  - (v) protection of national heritage, art and culture including restoration of buildings and sites of historical importance and work of art, setting up of public libraries, promotion and development of traditional marts and handicrafts.
  - (vi) measures for the benefit of armed forces veterans, war widows and their dependents.
  - (vii) training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports.
  - (viii) social business projects;
  - (ix) 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 for the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.
  - (x) contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
  - (xi) rural development projects.
- b. Projects or programmes relating to the activities under taken by the Board of Directors of the company in pursuance of the recommendation of the CSR Committee of the Company as per this CSR Policy.

#### **4. AMOUNT TO BE ALLOCATED**

- a. ASL will allocate 2% of the average of its previous three year's Net Profit, as its Annual CSR Budget in each Financial Year for the CSR Activities. The Average Net Profit shall be calculated in accordance with the provisions of Section 198 of the Companies Act, 2013.
- b. In case the allocated CSR budget/fund is not spent in the given financial year, the unutilized fund will be transferred to a CSR fund, which will accumulate for CSR activities in subsequent years.

#### **5. IMPLEMENTATION PROCESS:**

- a. CSR programmes will be undertaken by various units of ASL to the best possible extent within the defined ambit of the CSR Activities.
- b. The time period/duration over which a particular programme will be spread, will depend on its nature, extent of coverage and the intended impact of the programme.
- c. Programmes which involve considerable financial commitment and are undertaken on a timeframe of 2-5 years, will be considered as 'flagship programmes' and accorded enhanced significance.
- d. By and large, it may be ensured that at least 50% of the CSR Activities are executed in and around the areas adjoining ASL installations/Units and Mines.
- e. Initiatives of State Government, District Administration, Local Administration as well as Central Government Departments/Agencies, Self-helping groups, etc., would be synergized with the initiatives taken by ASL.
- f. Thrust should be given, wherever possible, to the areas related to the business of ASL as a natural corollary to the business.
- g. Investments in CSR should be Project based. Mere donations to philanthropic/charity, contribution of any amount directly or indirectly to any political party or other organizations would not come under the category of CSR Activities.
- h. CSR activities should generate community goodwill, create social impact and visibility.
- i. For CSR projects, the time-frame and periodic milestones should be finalized at the outset.

The process for implementation of CSR programmes will involve the following steps:-

j. **Identification of programmes** at Corporate, Mines and Unit level will be done out of the following:-

- i. Need identification studies by Sub Committee constituted by the CSR Committee of ASL
  - ii. Internal need assessment by a team at the unit level;
  - iii. Receipt of proposals/requests from District Administration/ Local Govt. etc.
  - iv. Discussions and request with local representatives/ Civic bodies/ Citizen's forums/Voluntary organizations.
- k. **Area of CSR activities:** CSR works being focused in the areas adjoining work places, the programmes identified should normally fall within a radius of 50 Kms. from ASL plants, mines and units and other work places.
- l. **Project based approach:** ASL units will follow a project based accountability approach to stress on the long term sustainability of CSR projects, where its action plan will be distinguished as 'Short-term', 'Middle-term' & 'Long-term', qualified as :-

Short Term	:	less than 6 months
Middle Term	:	6 months and above and less than 1 year
Long Term	:	1 years and above - 'flagship programmes'

m. While identifying Long Term Programmes, all efforts must be made to the extent possible to define the following:-

1. Programme objectives
2. Baseline survey - it would give the basis on which the outcome of the programme would be measured.
3. Implementation schedules:- Timelines for milestones of the programme will need to be prescribed
4. Responsibilities and authorities
5. Major results expected and measurable outcome.

**n. Approvals required:**

- i. CSR programmes as may be identified by each Unit/Corporate Office/Mines of ASL, will be required to be put up before the CSR Committee through the HOD of Personnel & Administration department, at the beginning of each financial year, with due recommendations.

- ii. For meeting the requirements arising out of immediate & urgent situations, on the basis of the recommendations of the HOD of P&A Department, and Concurrence of Finance, the CSR Committee of ASL will approve the proposals and authorise the Managing Director or any other Director of the Company to implement the same.
- o. **Executing agency**
  - I. ASL will identify suitable programmes for implementation in line with the CSR objectives of the Company and benefit the community for which those programmes are intended and will execute the activities by itself with the help of CSR committees/ Sub-committees.
  - II. The Board of Directors of the company may decide to undertake its CSR Activities approved by the CSR Committee through a Registered Trust or a Registered Society or M/s. Hira Foundation or any other Company established under Section 25 of the Companies Act, 1956 or Section 8 of the Companies Act, 2013.
  - III. The CSR Projects/Programmes/Activities can also be undertaken in collaboration with other companies in such a manner that the CSR Committees of respective companies are in a position to report separately on such projects or programmes in accordance with the provisions of the Companies Act, 2013 and Rules made there under in this connection.
  - IV. However, if need be, ASL may seek help from other agencies, such as:-
    - i) Community based organizations whether formal or informal
    - ii) Elected local bodies such as Panchayats
    - iii) Voluntary Agencies (NGOs)
    - iv) Institutes/Academic Organizations
    - v) Trusts, Missions
    - vi) Self-help Groups
    - vii) Government, Semi-Government and autonomous organizations
- p. **Criterion for identifying Executing agency:-**

In case of programme execution by NGOs/Voluntary organizations, the following minimum criteria need to be ensured:-

- \* The NGO/Agency has a permanent office/address in India
- \* The NGO is a registered society under Societies Registration Act.
- \* Possesses a valid Income-tax Exemption Certificate.

\* The antecedents of the NGO / Agency are verifiable/ subject to confirmation.

q. **Agreement between ASL & Executing Agency:**

Once the approved programmes under CSR are communicated to the units, they will be required to enter into an agreement with each of the executing/ implementing agency as per the **Standard Modal Agreement** approved by CSR Committee or any Director authorised by CSR Committee.

**6. MONITORING AND FEEDBACK**

- I. To ensure effective implementation of the CSR programmes undertaken at each Unit/Mines, a monitoring mechanism will be put in place by the Unit Heads at the Unit level. The progress of CSR programmes under implementation at the Unit/Mines will be reported by the Unit Heads on a **monthly** basis, to the HOD of P&A department, who holds the overall responsibility for implementation of CSR policy in the company. The HOD of P&A Department shall in turn report the progress of CSR programmes under implementation on **quarterly** basis to the CSR Committee giving the following details:
  - a. CSR Project or Activity Identified:
  - b. Thrust Area in which the project is covered:
  - c. Local area or other:
  - d. Specify the State and district where projects or programme was undertaken:
  - e. Budgeted amount for the project or programme:
  - f. Amount spent on the projects or programme indicating separately the Direct Expenditure and other Overheads.
  - g. Cumulative expenditure upto the reporting period;
  - h. Amount spent Directly or through implementing Agency:
  - i. Details of Implementing Agency:
  - j. Reasons for not implementing the projects or programme;
- II. The Corporate P&A department, in association with other concerned departments, will conduct impact studies on a periodic basis, through a duly constituted committee for this purpose, especially on the strategic and high value programmes.
- III. The Units/work centres will also try to obtain feedback from beneficiaries about the programmes, and will report to the HOD of P&A department at Corporate Office.
- IV. Appropriate documentation of the ASL CSR Policy, Annual CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis and the same will be displayed in the Company's official website.
- V. CSR Activities of the Company will also be reported in the Board's Report of the Company in the format prescribed in the Companies (CSR Policy) Rules 2014.

## **7. GENERAL**

- I. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to Corporate P&A department who in turn shall seek the clarification from the CSR Committee. In all such matters, the interpretation & decision of the CSR Committee shall be final.
  
- II. Any or all provisions of the CSR policy would be subject to revision/amendment in accordance with the Rules and guidelines on the subject as may be issued from Government, from time to time, subject to approval of the CSR Committee.
  
- III. The Company reserves the right to modify, cancel, add, or amend any of these Rules, with approval of the CSR Committee.

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