



CORPORATE SOCIAL RESPONSIBILITY POLICY

SHREE PRECOATED STEELS LIMITED

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Corporate Social Responsibility (CSR) Policy of SHREE PRECOATED STEELS LIMITED (“SPSL”).

OBJECTIVE:

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 SPSL to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

SPSL 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. SPSL 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.

PHILOSOPHY:

All CSR activities shall be driven by the core value of Inclusion. SPSL 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, infrastructure development, promotion of national heritage & culture etc.

REGULATORY FRAMEWORK:

The Companies Act ,2013 together with Rules notified there under (“the Act”) and Schedule VII of the Act provides a framework for the Companies to define the key thrust areas in the CSR space. The law also guides companies to apply the scope as defined under Sch VII liberally. Further, the Act also provides instructions on agencies eligible for implementation through which companies can spend its CSR Expenditure .



KEY THRUST AREAS:

With the advent of the Companies Act 2013 particularly Section 135 of the Act, SPSL shall undertake following activities under its CSR programme :

1. Eradicating hunger, poverty and malnutrition in vicinity of operating projects with a special focus on women, children, those affected by disability, displacement due to natural / manmade disasters.
2. Promoting preventive healthcare, sanitation & hygienic practices & making available safe drinking water including the contribution to Swach Bharat Kosh set up by the Central Govt. for promotion of sanitation.
3. Promoting inclusive education for all with a special focus on children with disabilities, including opening centers for research in special education / inclusive education & remedial education for the disadvantaged.
4. Special focus on educating the girl child and the underprivileged by providing appropriate infrastructure, and groom them as future value creators.
5. Promoting gender equality, conduct studies/ research with a special focus on women from vulnerable sections, economically backward & those with disabilities, self help groups etc.
6. Setting up homes for women, orphans & the senior citizens including special homes for foster care / life care of persons with disabilities in the community.
7. Creating an enabling & accessible environment for reducing inequalities faced by socially and economically backward groups.
8. Assist in skill development by providing education & vocational training, coaching for placement in appropriate employment models thereby empowering the disadvantaged sections towards a dignified life.
9. To establish an educational institute to promote universal design & barrier free infrastructure and to impart training courses to access auditors, students of design, rehabilitation, education, engineering, architecture etc.
10. Ensuring environmental sustainability and ecological balance including preparing communities for disaster management from micro to macro level.
11. Create positive awareness towards the need to adopt measures that lead towards reducing carbon footprints, dependence on fossil fuels and promote alternate energy approaches.



12. Conservation of natural resources by undertaking projects such as rain water harvesting, plantation drives, protection of fauna and flora, agro-forestry, including contribution to Clean Ganga Fund set up by the Central Govt. for rejuvenation of river Ganga ,etc.
13. Animal welfare including establishing institutions for training of Guide dogs/ attendant/ service animals for persons with disabilities.
14. Protection & Restoration of national heritage and art and culture & making them accessible to all.
15. Setting up of Inclusive Public Libraries, E- Libraries, digitization of libraries, etc.
16. Promotion and development of traditional arts & handicrafts.
17. Measures for the benefit of armed forces veterans, war widows and their dependents such as promoting accessibility in their built environments, rehabilitation by aids & appliances, prosthetics, mobility appliances, artificial limbs, etc.
18. Training & Promotion of rural, nationally recognized, Paralympics or Olympics sports, including sponsorships to attend events, quality sports equipment, etc.
19. 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 SC, ST, OBCs, minorities and women.
20. Contributions or funds provided to technology incubators located within academic institutions approved by the Central Government.
21. Sponsoring and supporting rural development projects.
22. Any kind of Slum Area Development particularly in areas as declared for such purpose by State or Central Government or any other Competent Authority under law for time bring in force.
23. Employee participation is an important part of developing responsible citizenship. Our company encourages and motivates employees to spend time volunteering on issues of social interest.



IMPLEMENTATION:

SPSL CSR programmes shall be implemented through any of the following medium:

a) Through Company's own brand name:

While brands are one of core resources for sustainable profit growth, SPSL believes that these brands, given their consumer connect, credibility and their trust in brands core values, are well positioned to perform a distinct role in spread heading SPSL's CSR cause. SPSL would lead some of its CSR programmes through its brands to spread awareness, credibility and quick adaptation. These will be designed to make Company's CSR to spend more effective in achieving its goals and reputational benefit which may occur to the Brand will be purely coincidental.

OR

b) S.S.Ajmera Trust (SSAT) :

S.S.Ajmera Trust is incorporated on 5th March,1979 registered with Charity Commissioner, it helps business and social organizations to enhance economic and social value using breakthrough innovation. SSAT is a GROUP TRUST formed by the Promoters of Ajmera Group. SPSL would make its contributions through capital and/or revenue grants, which in turn SSAT would deliver on CSR Programs of SPSL.

OR

c) Vijay Nagar Trust (VNT):

VNT is incorporated on 22nd October,2003 registered with Charity Commissioner, is another Group Trust through which all the charitable, social and economic welfare activities of SPSL would be done, which in turn would deliver on CSR Programs of SPSL.

GOVERNANCE:

The Board will have an oversight on the adherence of this policy. The Corporate Social Responsibility Committee ("CSR Committee") of the Board comprising of minimum three Directors and one of whom shall be independent Director of the Company, shall assist the Board in overall governance of the policy. The CSR committee shall work under superintendence and control of the Board.

A) The CSR Committee shall be headed by the Chairman of Board and shall be responsible to :



- 1) Formulate and approve revisions to the CSR Policy and recommend the same to Board for its approval.
- 2) Recommend the annual CSR expenditure budget to the Board for approval.
- 3) Approve the specific CSR Project where annual outlay is more than Rs.1 crore.
- 4) Set monitoring mechanisms in place to track record the progress of each project and track these projects at half yearly intervals
- 5) Undertaking wherever appropriate benchmarking exercises with other corporates to reassure itself of the efficacy and effectiveness of the Company's CSR Spend.
- 6) Approve the disclosure which are part of annual report.

B) CSR Team:

SPSL's CSR Programs will be driven by a dedicated CSR team under the guidance and support of CSR Committee. The CSR team shall consists of Representative of CSR Committee and HR Head or any other Authorised Representative as nominated by the CSR Committee. The CSR Team will play a significant role in implementation of the CSR Programs, ensuring that the same are in line with policy and the purview of applicable laws governing CSR. The CSR team will be responsible for :

- i) Co-ordination with the business function/unit/location and implementing agencies for successful implementation of the CSR Programs.
- ii) Reporting the progress and impact of CSR Programs on a quarterly basis to the Chairman of CSR Committee.

BUDGET:

- a) CSR expenditure will include all amounts incurred/contributed by the Company towards its CSR Programmes.
- b) The overall amount to be committed towards CSR will be approved by the Board of Directors as a part of annual Budget/Plans.
- c) Within the Budget the allocation towards specific CSR initiatives/projects will be approved/ratified by the CSR committee.
- d) If in any given year any unbudgeted expenses are to be incurred due to new projects/or due to increase in outlay of for an approved project, such unbudgeted expenses shall be incurred subject to following approvals:



- (i) Upto Rs.25Lacs –approval of CSR Committee
(ii) Above Rs.1 Crores –approval of Board.
e) Surplus arising out of CSR Projects, if any, shall be used for CSR Programs alone.

REVIEW:

A progress report on all the projects shall be shared by the CSR Committee with the Board half yearly. Additionally, the CSR Committee shall also endeavour to obtain feedback from the beneficiaries about these programmes.

Approved and signed by :

SD/-	SD/-	SD/-
Mr. Ishwarlal S.Ajmera Chairman & Managing Director	Mr. Sanjay C. Ajmera Managing Director	Mr. Dhaval R. Ajmera Director
SD/-	SD/-	SD/-
Mr.Ambalal C.Patel Independent Director	Mr.Jagdish Doshi Independent Director	Ms. Aarti Ramani Independent Director
SD/-		
Mr.Nilesh Sarvaiya Independent Director		
