CORPORATE SOCIAL RESPONSIBILITY POLICY

1. <u>INTRODUCTION</u>

The Corporate Social Responsibility (CSR) Policy of the OCL Iron and Steel Limited is aligned with its overall commitment to maintaining the highest standards of business performance. We recognize that our business activities have direct and indirect impact on the society. The Company strives to integrate its business values and operations in an ethical and transparent manner to demonstrate its commitment to sustainable development and to meet the interests of its stakeholders.

2. CSR VISION & VALUE

OCL Iron and Steel Limited (the Company) strongly believes that an organization should make decisions based not only on financial factors, but also on the social and environmental consequences and an effective growth policy must also take into account the fulfillment of the basic needs of the masses, especially of those living in rural areas. Thus OISL endeavors to improve the quality of life of communities living in the areas it operates. To achieve this, OISL deploys its resources to the extent it can reasonably afford, to improve inter alia the Rural Infrastructure, education, health, water, sanitation, environment, in the area it operates in. It entails having business policies that are ethical, equitable, environmentally conscious, gender sensitive, and sensitive towards the differently-abled.

CSR MISSION

The Company strives towards becoming a socially responsible corporate entity with a thrust on Community development, and education through sustained business conduct. The Company is committed to the philosophy of compassionate care and endeavors to act on ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. Further, the Company subscribes towards ensuring environmental sustainability through ecological conservation and regeneration and promoting biodiversity.

3. CSR POLICY

3.1 Objective

The purpose of this policy is to articulate what CSR means to the Company, kind of projects to be undertaken, identifying broad areas of intervention, approach to be adopted to achieve the CSR goals and monitoring mechanism. The framework enables to put in place policies and practices in line with this policy. This document is an attempt to showcase the linkage of our social objectives with business strategy.

3.2 Applicability

The CSR policy has been developed in consonance with Section 135 of the Companies Act, 2013 (referred to as the Act in this policy) on CSR and in accordance with the CSR rules (hereby referred to as the Rules) as amended from time to time notified by the Ministry of Corporate Affairs. The Policy shall apply to all CSR projects/ programmes undertaken by the Company in India as per Schedule VII of the Act.

3.3 CSR Focus Areas

In Line with the Company's vision, values and mission, the Board of Directors have identified the following core areas for CSR.

- To promote employment enhancing vocational skills in local area.
- To promote environment sustainability and ecological balance.
- To promote education among women, children and elderly in Rural areas.
- To promote health care & sanitation including combating HIV, Malaria & other diseases.
- Health & Environmental awareness programs in local schools and villages
- Financial assistance to schools/Organizations for mentally and physically challenged
- Assisting NGOs for poverty alleviation and promoting literacy
- Development of greenbelt around OISL and plantation by the side of the roads & in the neighboring villages/towns

3.4 CSR Corpus/Funds Allocation

The CSR corpus for the purpose of carrying on the aforesaid activities shall be arrived at on computation of two percent of the average net profits calculated in accordance with the provisions of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility) Rules, 2014.

Any income arising there from and surplus generated from CSR projects undertaken by the Company shall be tracked and channelized into the CSR corpus. These funds shall be further used in development of the CSR projects and shall not be added to the normal business profits.

The CSR Committee shall recommend the project wise annual budgeted expenditure to the Board for its consideration and approval. The CSR Committee shall monitor the project expenditure.

3.5 Monitoring

The administration of the CSR Policy and the execution of identified CSR projects, programs and activities under it shall be carried out under the overall supervision and guidance of the CSR Committee formed for this purpose which shall comprise of-

- Mr. Vinod Kumar Uppal Chairman
- Mr. Yogesh Kapur Member

• Mr. Sanjay Tiku- Member

The CSR Committee shall submit its report on a quaterly basis to the Board of Directors.

The Responsibilities of the CSR Committee inter alia include:-

- Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken.
- Recommending the amount of expenditure for the CSR activities, and
- Monitoring CSR activities from time to time.

Further, any or all provisions of the CSR Policy shall be subject to revision/amendment by the Board 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.

4. REVIEW AND REPORTING

- To ensure effective implementation of the CSR activities undertaken at each Unit, the committee will submit progress reports on quarterly basis to the Board of Directors of the Company.
- CSR Committee shall ensure that Accountability is fixed at each level of CSR process and implementation.
- CSR Committee shall ensure that CSR projects and programmes are being properly documented.

5. <u>INFORMATION DISSEMINATION</u>

Contents of this policy shall be disclosed in the Annual Report and shall also be placed on the website of the Company.