

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR)*

- A-ONE STEELS INDIA LIMITED

(FORMERLY KNOWN AS A-ONE STEELS INDIA PRIVATE LIMITED AND A-ONE STEEL AND ALLOYS PRIVATE LIMITED)

*This policy has been instituted based on the Corporate Social Responsibility (CSR) philosophy of **A-ONE STEELS INDIA LIMITED (FORMERLY KNOWN AS A-ONE STEELS INDIA PRIVATE LIMITED AND A-ONE STEEL AND ALLOYS PRIVATE LIMITED)** and provisions of Section 135 of the Companies Act, 2013, read with Schedule VII of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time and the notifications and circulars issued by the Ministry of Corporate Affairs from time to time.

TABLE OF CONTENTS

Sl No.	Content
A	Context
B	Definitions
C	CSR Projects, Programmes and Activities
D	Focus Areas
E	Mode of carrying out CSR activities
F	Composition & Responsibilities of A-One Steels CSR Committee
G	Decisions by the A-One Steels CSR Committee
H	CSR Spending
I	Monitoring Process
J	Reporting
K	Effective Date
L	Amendments
	Schedule-1

A. CONTEXT:

A-ONE STEELS INDIA LIMITED (FORMERLY KNOWN AS A-ONE STEELS INDIA PRIVATE LIMITED AND A-ONE STEEL AND ALLOYS PRIVATE LIMITED) ('A-ONE STEELS' or 'the Company') is committed to undertake CSR activities in accordance with the CSR Regulations.

The Company believes that corporate growth and development should be inclusive and every Company has to be responsible and contribute towards betterment of the society. The Company wishes to commit itself to contribute to the society in ways possible for the organization.

To further the Company's CSR philosophy, the Board has constituted "**A-ONE STEELS CSR Committee**" as its core CSR team, as a means of fulfilling this commitment.

B. DEFINITIONS:

Act	Companies Act, 1956/Companies Act, 2013 (as applicable), as amended and modified from time to time;
Areas of Interest/Objective	The focus areas / areas of interest as identified by the Company for implementing CSR goals in accordance with the CSR Regulations and as specified in Paragraph D of this CSR Policy read with Schedule I hereto;
Board	Board of Directors of the Company;
Company	A-ONE STEELS INDIA LIMITED (FORMERLY KNOWN AS A-ONE STEELS INDIA PRIVATE LIMITED AND A-ONE STEEL AND ALLOYS PRIVATE LIMITED)
CSR	Corporate Social Responsibility;
A-One Steels CSR Committee	The committee of the Board constituted to implement, supervise and manage the CSR initiatives of the Company in accordance with the CSR Policy of the Company and the provisions of the CSR Regulations, as amended from time to time;

CSR Commitment	In respect of a financial year, shall mean at least 2% (Two Percent) of the average Net Profits of the Company made during the 3 (Three) immediately preceding financial years or such minimum contribution as prescribed under the CSR Regulations, as amended from time to time;
CSR Policy	The CSR Policy of the Company, as amended from time to time;
CSR Regulations	Section 135 of the Act (as amended from time to time), the CSR Rules (as amended from time to time) and the notifications and circulars issued by the Ministry of Corporate Affairs from time to time, collectively;
CSR Rules	The Companies (Corporate Social Responsibility) Rules, 2014, as amended from time to time;
Net Profit	Shall have the meaning as prescribed to it in the CSR Rules; and
Organisations	Such organizations including Non-Governmental Organizations (“NGO”) as are permitted to receive funding in accordance with the CSR Regulations.

C. CSR PROJECTS, PROGRAMMES AND ACTIVITIES:

The Company may undertake various CSR projects, programs and activities from time to time. The Company may also contribute towards any existing or ongoing CSR projects, programs and activities. Such projects, programs and activities will be undertaken keeping in mind the CSR philosophy of the Company and in alignment with the permissible activities under the CSR Regulations. It shall be at the discretion of the Company to undertake, modify, implement and/or cancel CSR projects, programs and activities from time to time as it deems fit.

D. FOCUS AREAS:

Without prejudice to the generality of the aforesaid, the Company may (either independently or in collaboration with other entities) undertake one or more of the following activities under the ambit of CSR:

- (i) **Education:** Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly and the differently abled, by: (i) providing monetary contributions to academic institutions for establishing endowment funds and chairs; (ii) providing, food, vehicles, technology products, mobiles, tabs and other facilities with the objective of assisting students in their studies and also contribute to the NGO's in various manner.
- (ii) **Health Care Activities:** Providing health care for visually impaired and physically challenged, creating awareness programmes, setting up of toilets in villages, helping anganwadies and facilitating them with basic amenities and setting up of mobile health vans for rural Karnataka.
- (iii) **Gender Equality and Empowerment of Women:** Setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens and promote measures for reducing inequalities faced by socially and economically backward groups.
- (iv) **Environmental Sustainability:** Ensuring environmental sustainability, ecological balance, promotion of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintenance of quality of soil, air and water.
- (v) **Others:** Any other projects, programs and activities falling within the permissible activities prescribed under the CSR Regulations and Schedule I hereto.

E. MODE OF CARRYING OUT CSR ACTIVITIES:

The Company may carry out the CSR activities either on its own, or through a registered trust or registered society or through a Company registered under Section 8 of the Act or through one or more of the modes in such manner as it deems fit. Company may also collaborate with other companies for undertaking projects, programs and activities in such manner as it deems fit and as approved by the A-One Steels CSR Committee.

In the event the Company contributes money to the corpus of a trust/society/company, the A-One Steels CSR Committee will ensure that:

- (i) The trust/society/company has been created/incorporated exclusively for undertaking CSR Activities or such corpus of such trust/society/company is created exclusively for a purpose relatable to a subject covered under CSR Regulations; and
- (ii) Such company or trust or society shall have an established track record of at least 3 (Three) years in undertaking similar programs or projects.

F. COMPOSITION AND RESPONSIBILITIES OF A-ONE STEELS CSR COMMITTEE:

(i) COMPOSITION:

The A-One Steels CSR Committee shall consist of minimum 3 (Three) or more members as may be decided by the Board from time to time. The Board may change the composition of the A-One Steels CSR Committee from time to time in such manner as it thinks fit and as required under the CSR Regulations.

(ii) OBJECTIVES OF THE COMMITTEE:

1. To develop a long term vision and strategy for A-One Steels CSR activities.

2. To establish process mechanism for the implementation and monitoring the CSR activities of A-One Steels , in accordance with the CSR Regulations.
3. To strive for economic development that positively impacts the society at large with a minimal resource foot print.

(iii) RESPONSIBILITIES:

To achieve the above objectives, the A-One Steels CSR Committee will have, *inter alia*, the following roles, powers and responsibilities:

- i). Formulate and recommend to the Board, the CSR projects, programs and activities to be undertaken by A-One Steels, in compliance with the CSR Regulations;
- ii). Recommend to the Board on CSR expenditure to be incurred on the proposed CSR activities.
- iii). Determine the modalities of execution of such CSR projects, programs and activities;
- iv). Undertake all necessary steps to implement the CSR activities;
- v). Authorise and approve CSR expenditure from time to time subject to the limits approved by the Board;
- vi). Determine the extent and manner of distribution of funds towards the various CSR projects undertaken by the Company;
- vii). Monitor the CSR activities as it deems appropriate and obtain the status reports / supporting documents;
- viii). Carry out all such acts, deeds, matters and things as may be required in connection with aforesaid matters and generally for any matter connected with the CSR policy of the Company (including without limitation Schedule I hereto);
- ix). To perform such functions as may be entrusted by the Board from time to time; and

- x). Prepare annual report on CSR activities undertaken by A-One Steels and submit such report to the Board.

G. DECISION MAKING BY THE A-ONE STEELS CSR COMMITTEE:

- (i) The A-One Steels CSR Committee shall at all time act in a manner that is consistent with the provisions contained in this CSR Policy and the CSR Regulations.
- (ii) The A-One Steels CSR Committee shall endeavor to arrive at all decisions via consensus of all members. However, in the event the A-One Steels CSR Committee is unable to arrive at a consensus, the decision of the Chairman of the A-One Steels CSR Committee shall be final.
- (iii) All decisions of the Committee shall be ratified by the Board.

H. CSR SPENDING:

- (i) The Company may, in every financial year, spend such amounts on its CSR activities as the A-One Steels CSR Committee may authorise from time to time subject to the limits as approved by the Board.
- (ii) Any surplus arising out of CSR projects, programs and activities undertaken by the Company shall not form part of the business profits of the Company.

I. MONITORING PROCESS:

A-One Steels CSR Committee shall monitor the implementation of various programs, projects and activities in such manner as it deems fit. A-One Steels CSR Committee shall also determine the manner of submission of information, reports, files, etc. by third parties as a part of the monitoring process. A-One Steels CSR Committee shall ensure that a transparent monitoring mechanism is put in place.

In the event the Company wishes to implement the CSR activities undertaken by it through a registered trust or society or through a Company registered under section 8

of the Act, a report on the progress made by such trust / society / company is to be submitted on a quarterly basis to the A-One Steels CSR Committee for its review and recommendations. The A-One Steels CSR Committee shall periodically report to the Board on the progress made by the Company in implementing the CSR activities undertaken by it.

J. REPORTING:

- (i) The Board's report shall include an annual report on CSR (containing particulars as required under the CSR Regulations), projects, programs and activities undertaken by the Company in the relevant financial year.
- (ii) The A-One Steels CSR Committee shall provide a responsibility statement on the implementation and monitoring of the CSR Policy and that it is in compliance with CSR philosophy of A-One Steels, which statement shall form part of the Board's Report.

K. EFFECTIVE DATE:

The Policy shall be effective from **05th November 2018** after its final approval by the Board and as amended from time to time.

L. AMENDMENTS:

The Policy may be reviewed and amended from time to time by the Board based on the recommendation of the A-One Steels CSR Committee.

**On behalf of the Board
FOR A-ONE STEELS INDIA LIMITED**

Sd/-
(SANDEEP KUMAR)
Managing Director

SCHEDULE – 1

CSR ACTIVITIES TO BE UNDERTAKEN BY THE COMPANY

The CSR shall focus on social, economic and environmental impact. Various activities that can be undertaken by the Company in general under CSR are outlined below. The Company may take up one or more of the below activities as required by applicable laws.

1. Eradicating hunger, poverty and malnutrition, promoting and preventive healthcare and sanitation including contribution to the Swach Bharat Kosh set up by the Central Government, set-up toilets in villages, management of waste and supporting municipalities for promotion of sanitation and making available safe drinking water.
2. Promotion of education, including special education and employment enhancing vocation skills especially among children, woman, elderly and the differently abled persons and livelihood enhancement projects and providing scholarships for meticulous students, promoting technology and other supporting contribution to the children's by providing tabs/mobiles.
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, helping anganwadies and facilitating them with basic necessities, setting up of day care centres and such other facilities for senior citizens;
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources, plantation of trees, maintain green belts across the road, maintaining quality of soil, air and water including contribution to Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga and other lake cleaning initiative to begin with by collaborating with local government, private agencies, semi government bodies, installing air purifier in local and government hospitals.

5. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up of 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 and Paralympics sports and Olympic sports;
 8. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and welfare of the societies;
 9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
 10. Rural development projects by construction of Roads and providing basic infrastructures, drinking water facilities, street lights and enhance education on renewable resources of energy sector; and
 11. Development of Slum Areas.
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The Composition of the CSR Committee:

The CSR committee consisting of following members:

Sl.No.	Name	Designation
01.	Mr. Sunil Jallan	Chairman
02.	Mr. Sandeep Kumar	Member
03.	Mr. Kamaldeep Singh	Member