

CSR Policy

Under this policy, JSW Structural Metal Decking Limited (JSWSMD) is committed to supporting selected causes for the social and economic development of primarily, but not exclusively, the surrounding communities of its offices and factories in which it operates in India.

Its Corporate Social Responsibility, reviewed and implemented by its CSR Committee, which operates, reports to and is guided by the Company's JV Board, will engage *inter alia* in activities that will help foster and improve standards in such areas as:

- **Education**

By way of access to quality education, training, teachers' capacity building and skill enhancement and support for education at all levels from pre-primary to tertiary education and improve employability which would include activities, whether urban, semi-urban and/ or rural in all aspects irrespective of locations.

- **Health Care**

By focusing on affordable solutions, improved access, awareness and health seeking behavior and helping causes which reduce poverty, hunger, malnutrition and improve living conditions such as sanitation, clean water etc.

- **Water & Environment**

By way of support to flora and fauna sustainability and improved overall sanitation with efficient waste management

- **Entrepreneurship for Socio Economic improvement**

By way of promotion for overall socio-economic improvement and empowerment of the communities including:

- ✓ Promoting art and setting up libraries including their maintenance.
- ✓ Ensuring that measures are in places for the welfare and wellbeing of war veterans, ex-servicemen and retired police force, whether set up under the aegis of the Central or the State Governments, whether local or otherwise in all their activities including for the benefit of their dependents, widows and orphans.
- ✓ Encouraging and promoting rural sports including paralympic and Olympic sports which may involve monetary incentives to mentors, trainers and coaches.



- ✓ Contributing to all funds initiated by the Government as relief to the down trodden including Schedule Castes and Schedule Tribes for all rural, urban, semi-urban development projects.
- ✓ Contributions to research establishments in the field of science, technology, engineering, medicine, etc. through Government agencies or otherwise and all institutes which are funded or encouraged by the Government, Central or State.

Impact Assessment

The Company strives to capture the impact (social/economic and developmental) of its various initiatives through multiple mediums. The Company shall undertake Impact assessment of programs wherever applicable. The impact assessment studies shall be conducted in such manner as may be prescribed under applicable provisions of the Act and the Rules made thereunder, as amended, from time to time.

The reports of Impact assessments, if applicable, shall be put up for review to the CSR Committee and Board of Directors of the Company and shall be annexed to the annual report on CSR.

Board and its Commitments

The Board of JSWSMD has constituted Corporate Social Responsibility Committee for implementing the CSR policies and is committed to comply with all the relevant provisions as envisaged under the Companies Act, 2013 and its relevant rules which Committee will monitor and govern all CSR activities within the parameters set out under the Act and Rules.

The Board shall ensure that the administrative overheads shall not exceed five percent of the total CSR expenditure of the Company for any financial year.

The Board of the Company shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer of the Company or the person responsible for financial management shall certify to this effect.

Corporate Social Responsibility (CSR) Committee

The CSR Committee will ensure that the company complies and meets its obligations under the Companies Act 2013 and the (Corporate Social Responsibility Policy) Rules, 2014, and that worthy causes are validated by it prior to support being selected, approved and given by the



Board. The CSR Committee shall be fully empowered to revise, add and lay emphasis on specific areas for interventions based on the needs assessed. The Committee is further committed to ensure absolute financial discipline as required under the Act, Rules and the Schedule.

The CSR Committee shall formulate and recommend to the Board, an annual action plan consisting of the following:

- The list of CSR programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act.
- The manner of execution of such programs.
- The modalities of utilization of funds and implementation schedules for the programs.
- Monitoring and reporting mechanism for the programs; &
- Details of need and impact assessment, if any, for the programs undertaken by the Company Provided that Board may alter the Annual Action plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

The CSR Committee shall meet regularly to review the implementation of CSR programs/ programs and give suitable direction.

In case of an ongoing program, the Board of the Company shall monitor the implementation of the program with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the program within the overall permissible time. "Ongoing Program" here means a multi-year program undertaken by the Company in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced and shall include such program that was initially not approved as a multi-year program but whose duration has been extended beyond one year by the board based on reasonable justification.

Budget

The Board of Directors of the Company shall ensure that minimum of 2% of the average net profits of the company made during the three immediately preceding financial years is spent on CSR initiatives undertaken by the Company. The "net profit" shall be calculated in accordance with the provisions of section 198 of the Companies Act, 2013.

All expenditure towards the programs shall be diligently documented.

Any surplus arising out of the CSR activities shall not form part of the business profit of the Company and shall be ploughed back into the same/similar program or shall be transferred to



the Unspent CSR Account and spent in pursuance of CSR Policy and annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Where a Company spends an amount more than requirement provided under Section 135 of the Companies Act, 2013, such excess amount may be set off against the requirement to spend under Section 135, up to immediate succeeding three financial years subject to the conditions that –

- the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any; and
- the Board of the Company shall pass a resolution to that effect.

Treatment with respect to unspent CSR amount

If the Company fails to spend prescribed CSR amount, the Board shall, in its report specify the reasons for not spending the amount and unless the unspent amount relates to any ongoing project and transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Any prescribed CSR amount remaining unspent pursuant to any ongoing project, undertaken by a Company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the Company within a period of thirty days from the end of the financial year to a special account to be opened by the Company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the Company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the Company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

The details of the CSR programs shall be communicated through the Company's website to the relevant stakeholders and feedback received, if any, shall be used for further refinement of the CSR programs.

JSWSMD will follow the guidance that may be required in CSR matters, if necessary, from the holding company namely JSW Severfield Structures Limited.

Overall the Board is committed to comply with all related provisions of the Companies Act, 2013 along with Schedule VII and (Corporate Social Responsibility Policy) Rules, 2014, and all their amendments on an on-going basis.



Composition of CSR Committee

Name of the Director	Position
Mr. Praveen Mam	Chairman
Dr. Derek Randall	Member
Mr. Benedict Pratten	Member