

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)

Inducto Steels Limited (ISL) part of Hariyana Group engaged in Ship Recycling is based in Alang, Asia's largest and world's major Ship Recycling Yard. ISL operates in a manner that not just continues to generate an attractive return for shareholders, but also minimizes our impact on the environment and helps in replenishing the planet; while lending a helping hand to the community. The Company believes in the concept of trusteeship which is evident from its mission and vision statement and one of its core values as follows:

- **MISSION**
Our aim is to create a team of industry leaders, committed to excellence in quality focused on creation and enhancement of stakeholder value.
- **VISION**
To emerge as leaders in the ship recycling business and to spearhead unprecedented heights, providing safety to our people and the environment and delivering superior value to all stakeholders.
- **RESPONSIBILITY**
Sensitive to national, international communities and environments in which we work, ensuring that what comes from the people goes back to the people many times over.

CONSTITUTION OF CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

The Board of Directors of the ISL have formed a Corporate Social Responsibility Committee (the "CSR Committee") in line with Section 135 of the Companies Act, 2013 (the "Act"). The CSR Committee will carry out the following functions:

- to formulate and recommend to the Board, a CSR policy indicating activities to be undertaken as specified in Schedule VII of the Act;
- to recommend the amount of expenditure to be incurred on the activities referred to in sub-paragraph (i) above; and
- to monitor the CSR policy from time to time.

OUR ACTIVITIES

The CSR activities, we pursue, will be in line with our stated Vision and Mission, focused not just around our plants and offices, but also in other geographies based on the needs of the communities.

The areas where special Community Development programmes would be run are:

1. Eradicating hunger, poverty and malnutrition

- Provision of food, nutrition supplement, clothes, etc. for the poor, children and other deprived sections of the society.
- Supporting nutrition requirements of the poor, children and other deprived sections of the society.
- Provision of shelter for homeless.
- Promoting sanitation, making available safe drinking water.

2. **Promoting Health care including Preventive Health care through:**
 - Awareness programmes.
 - Health check-ups.
 - Provision of medicine & treatment facilities.
 - Providing pre natal & post natal healthcare facilities.
 - Prevention of female foeticide through awareness creation.
 - Program for preventing diseases and building immunity.

3. **Ensuring environmental sustainability and ecological balance through :**
 - Plantation drives in schools, villages, our manufacturing units & offices/business premises and other areas in general.
 - Reviving endangered plants, promoting agro-forestry.
 - Protection of flora & fauna.
 - conservation of natural resources.
 - Maintaining quality of soil, air & water.
 - Adoption of wastelands to cultivate plants.
 - Promoting biodiversity.
 - Animal welfare and veterinary services.
 - Technical support and Know-how for improving farming and building capacities of small farmers.
 - Promoting alternate energy resources.

4. **Employment and livelihood enhancing vocational skills and projects** including tailoring, beautician, mehendi application, bee keeping, food processing and preservation, vermi-composting and other Life Skill Training and livelihood enhancement projects.

5. **Promotion of education** especially among children, women, elderly and the differently able including:
 - Non-formal education programmes.
 - Supporting schools with infrastructure like benches, toilets, potable water, fans, etc.
 - Supporting other educational institutions.
 - Improving educational facilities in general.
 - Supporting children for higher education.

6. **Promoting gender equality and empowering women** including:
 - Adult literacy for women.
 - Promoting and providing credit support to women's self-help and joint liability groups.
 - Training in vocations pursued by women.
 - Setting up homes for women & orphans.
 - Setting up old-age homes & other facilities for senior citizens.
 - Setting up hostels for working and student women, day care centres for kids of working women.

7. Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government.

8. Rural Development Projects.

9. Other Activities which may include:

- Promotion of Sports with special focus on training for rural sports, nationally recognised sports, Paralympic sports, Olympic sports.
- Welfare for differently disabled persons.
- Setting up public libraries.
- Reducing inequalities faced by the socially and economically backward groups.
- Protection of national heritage, art, culture and handicraft; Restoration of Buildings & sites of historical importance & works of art.
- Welfare of armed forces personnel, war widows and their dependants.

10. Incidental Activities like employing people and incurring other costs to carry out aforesaid activities.

11. Such other activities as the Board may consider appropriate on the recommendations of the CSR Committee.

OUR APPROACH TO IMPLEMENTATION

We will strive to implement the aforesaid CSR activities on our own to the extent possible. At the same time, we recognize need to work in partnership with other players also. This would include:

1. Collaborating with various organisation, which are registered as a Trust or a section 8 company under the Companies Act, 2013 or Society or NGOs or any other form of entity incorporated in India that specialise in the aforesaid activities.
2. Contribution to various funds which are aligned with our Vision and Mission e.g.
 - Prime Minister's National Relief Fund
 - Any other fund set up by the Central Government for :
 - socio- economic development and relief.
 - for the welfare of Scheduled Castes, the Scheduled Tribes, other Backward classes, minorities and women.
3. Collaborating or pooling resources with other companies to undertake aforesaid CSR activities.

CSR BUDGET

The total budget for the CSR projects will be decided by the CSR Committee in accordance with applicable provisions of the Act and the CSR Rules. However, surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of a company.

IMPLEMENTATION

The CSR activities will be driven by a dedicated project team under the guidance and support of the CSR Committee and the Board. The CSR Committee will play a significant role in ensuring that the CSR policy is embedded across and the CSR initiatives are in line with this policy.

MONITORING

The CSR Committee will be responsible for monitoring approved projects and fund disbursements for such projects. The CSR Committee will put in place a transparent monitoring mechanism for ensuring effective implementation of the projects, programs and activities proposed to be undertaken. Such monitoring mechanisms will include:

1. Visits, meetings and progress/status reporting by the project teams.
2. Achievement since last progress report / during the last quarter in terms of coverage compared to the target and reasons for variance.
3. Achievement of the year-to-date in terms of coverage compared to the target, plans to overcome shortfalls, if any, and support required from the CSR Committee/Board to overcome the shortfalls.
4. Actual year-to-date spends compared to the budget and reasons for variance.
5. In respect of activities undertaken through outside Trust/Society/NGO's etc. there will be mechanism of monthly reporting of progress on each such activities and the amount incurred thereon.

The Board shall seek a short progress report from the CSR Committee periodically.

REVIEW MECHANISM

Any or all provisions of this CSR policy may be amended by the Board based on the recommendations of the CSR Committee or in accordance with any statutory guidelines that may be issued from time to time.