

PENGG USHA MARTIN WIRES PRIVATE LIMITED

CSR POLICY

A) Company's Commitment to Corporate Social Responsibility

The Company is aware of its responsibilities towards the less privileged of society and is committed to working towards the betterment of livelihood of those less privileged living in the close proximity to the Company's plant.

B) Implementation and Expenditure

The Company is committed to spend, in every financial year, at least 2% (two percent) of its average net profits (calculated in accordance with the provisions of Section 198 of the Companies Act 2013 ("CA 2013") and Rules made thereunder (as amended) during the 3 (three) immediately preceding financial years ("Mandatory Allocation") to undertake projects and activities that are in compliance with requirements of the CA 2013, the Rules and any notifications issued thereunder. Any surplus arising from such activities shall also be spent on activities specified under this Policy.

Any expenditure for CSR incurred under this Policy shall be for those projects and schemes which are envisaged in Schedule VII of CA 2013 as provided in Annexure A and shall be completed by 31st March every year.

The Committee may consider instead of directly undertaking CSR activities on its own, contribute the mandatory allocation to a registered trust or any registered society or any non profit seeking company having its area of operation in the State of Jharkhand.

C) Operations & Administration

- 1) The Corporate Social Responsibility Committee ("Committee") constituted under Section 135(1) of the CA 2013 will supervise and monitor all expenses incurred for CSR activities.
- 2) The Committee shall, not later than 180 (one hundred eighty) days from the commencement of each financial year, formulate and recommend to the Board of Directors ("Board") annual budget for CSR projects as part of the Annual Plan.
- 3) The Committee shall also formulate a plan to allocate resources for CSR activities. Thereafter the Committee will monitor the implementation of the plan to be completed within 31st March of every year.
- 4) The Committee will exercise optimal supervision to ensure that undertaken project/(s) meet specified timelines and outcome.

D) Reporting

- 1) At every first Board Meeting of the financial year, the Committee shall provide an Annual Report in the form as set out in the CA2013 and Rules made thereunder to the Board for the CSR activities undertaken by the Company or through any implementing Agency during the previous financial year for inclusion in the Report of the Board of Directors.
- 2) In the event the annual Mandatory Allocation is not spent by the Company in any financial year, the Committee shall provide a report to the Board stating the reasons for the failure of the Company to spend the budgeted amount.

E) Amendment

- 1) The Committee will re-evaluate social responsibility objectives of the Company, from time to time, in light of changes in the Company's objectives, industry best practices and evolving priorities and needs of the local communities in locations where the Company operates and sources materials and recommend to the Board modifications to the CSR Policy and the Annual Plan, considering its suitability, adequacy and effectiveness. Any recommendations for improvements or modifications of the CSR Policy and the Annual Plan will be presented to the Board for its consideration.
- 2) Any amendment or waiver of any provision of this Policy must be approved in writing by the Board."

Annexure A

- i) Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water:
- ii) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- iii) Promoting gender equality, empowering 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 measures for reducing inequalities faced by socially and economically backward groups;
- iv) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining quality of soil, air and water;
- v) Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts:
- vi) Measures for the benefit of armed forces veterans, war widows and their dependents;
- vii) Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- viii) 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 the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- ix) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- x) Rural development projects."