



CORPORATE SOCIAL RESPONSIBILITY POLICY

(FRAMED UNDER SECTION 135(3) (a) OF COMPANIES ACT, 2013)

1] BRIEF OVERVIEW OF SHAKAMBHARI GROUP OF INDUSTRIES:

Shakambhari Group of Industries (SGI) mainly comprises of its 4 group companies i.e SPS Steels Rolling Mills Limited, Shakambhari Ispat and Power Limited, Eloquent Steel Private Limited and Bravo Sponge Iron Private Limited. The said CSR Policy has been adopted by all the above stated 4 companies. The term SGI wherever used in this policy shall deem to include all the 4 companies under the same management. The policy has been modified and adopted by the Board of Directors after incorporating the amendments brought in by the CSR Amendment Rules, 2021.

2] CORPORATE SOCIAL RESPONSIBILITY OBJECTS:

SGI seeks to be a good corporate citizen wherever it does business and respects local concerns, customs and traditions. Embracing Diversity is a cornerstone of SGI values. SGI recognizes that its operations impact a wide community of stakeholders, including investors, employees, customer, business associates and local communities, and that appropriate attention to the fulfillment of corporate responsibilities will enhance overall performance. SGI is committed to positively contribute to the future of the planet by supporting education opportunities for children and youth, as well as those coming from disadvantaged background and especially encouraging more women into scientific/technical fields of education.

3] CSR POLICY:

In accordance with Section 135(5) of the Companies Act, 2013 ("the Act"), SGI is committed to spending at least 2% of the average net profits made during the three immediately preceding financial years on some of the identified activities listed in Schedule VII to the Act. This includes spending on CSR activities through various Implementing Agencies indulged in various kind of CSR activities.

The CSR activities to be undertaken by the Company will be approved by the Board of Directors of the Company on the recommendation of the CSR Committee. Any activity undertaken in pursuance of the normal course of business of the Company will not be considered as a CSR Activity for the purpose of compliance with Section 135 of the Companies Act, 2013.

The areas for the CSR activities of the Company are:

1. Hunger eradication, Poverty eradication including contribution to the Swachh Bharat

- abhiyan;
2. Promotion of education;
 3. Promotion of gender equality, child welfare and women empowerment;
 4. Conservation and Environment and contribution to the Clean Ganga initiative;
 5. Contribution to national heritage, Public Library and promotion and development of traditional art and handicrafts;
 6. Contribution for benefit of armed forces veterans, war widows and their dependents;
 7. Promotion of rural sports and other nationally recognised sports;
 8. Contribution to Prime Minister National Relief Fund and PM CARES Fund;
 9. Contribution to incubators funded by Central Government or State Government or any agency recognized by Govt. of India;
 10. Rural development projects and slum area development;
 11. Disaster management, including relief, rehabilitation and reconstruction activities;

4] CSR EXPENDITURE:

CSR expenditure shall include all expenditure, direct or indirect, capital or revenue, incurred by the Company for projects or programs relating to CSR activities approved by the Board on the recommendation of the CSR Committee, but will not include any expenditure on an item not in conformity with activities which fall within the purview of the Schedule VII of the Act.

The amount to be spent on CSR activities shall be calculated in accordance with the provisions of the Companies Act, 2013 and Rules and notification issued thereunder. Any shortfalls in the expenditure may be made up by contributions to approved Funds.

Any surplus arising out of CSR activities, programmes or projects shall not form part of the business profit of the Company.

5] GOVERNANCE:

The Board of Directors has delegated responsibility for the organisation of the Company's CSR Activities to the CSR Committee comprising of Directors of the Company including the Managing Director.

1. At the beginning of every financial year, the CSR Committee will prepare a CSR Plan delineating the CSR Activities to be carried out during the financial year with specified budgets for each activity aggregating to the CSR spend threshold limit of 2% of average net profits, and present the CSR Plan for the approval of the Board of Directors. The CSR Plan once approved by the Board of Directors will then be implemented by the CSR Committee.
2. The Implementing Agencies to which the implementation is assigned will carry out such CSR Activities and report back to the CSR Committee on the progress and expenditure on each activity.
3. The CSR Committee will review the CSR Activities and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Activities in accordance with this Policy.
4. The CSR Committee will update the Board of Directors on the compliance of the CSR

requirements and status of the CSR Activities from time to time.

5. At the end of every financial year, the CSR Committee will submit its report to the Board of Directors in the format required under the CSR Rules.
6. The responsibility of disbursements for CSR Activities as per the CSR Budget and compliance with other provisions of Section 135 of the Companies Act, 2013 and rules thereon, will be with the Managing Director.

6] INFORMATION DISSEMINATION

All disclosures, display and reporting requirements related to CSR activities will be made in accordance with the provisions of the Companies Act, 2013, its Rules and the notifications issued by the Ministry of Corporate Affairs from time to time. Information on CSR activities will be uploaded to the website of the Company www.spsgroup.co.in and also reported in the Directors Report to Shareholders.

