

**CORPORATE SOCIAL RESPONSIBILITY POLICY
OF
INDIA STEEL SUMMIT PRIVATE LIMITED**

1. CONTEXT

India Steel Summit Private Limited (“ISS” or “the Company”) Policy outlines the Company’s philosophy & the mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large as part of its duties as a responsible corporate citizen.

2. OBJECTIVES

ISS’ CSR Policy intends to:

- Strive for economic development that positively impacts society at large with minimal resource footprint.
- Embrace responsibility for the Company’s actions and encourage a positive impact through its various activities to alleviate hunger, poverty, malnutrition and health care; education; to protect the environment; and to support communities, stakeholders and society.

3. AMOUNT OF CSR FUND TO SPEND DURING EACH FINANCIAL YEAR

As per Section 135 of every Company having net worth of rupees five hundred crore or more or turn over rupees one thousands crore or more or net profit of five crore or more during any financial year shall ensure that the Company spends, in every financial year, at least 2 % of the average net profits of the Company during the immediately three preceding financial years Based on the financial results the management will announce and allocate the CSR funds every financial year through the Board of Director's approval.

4. FOCUS AREAS AND MODES OF IMPLEMENTATION

Focus areas

In accordance with the requirements under the Companies Act, 2013 and the rules / regulations framed there under and circulars / clarifications issued thereunder (collectively, “Applicable Law”), ISS CSR activities, amongst others, will focus on:

HUNGER, POVERTY, MALNUTRITION AND HEALTH:

Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.

EDUCATION:



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- Construction/repair of school, college & other educational buildings & facilities including special education facilities
- Provision of uniforms, books, stationery, computer & Laboratory equipment's and other infrastructural facilities, to schools, colleges, universities etc
- Scholarships/fellowships to deserving students to encourage education
- Vocational/technical/professional training for youth

ENVIRONMENTAL SUSTAINABILITY

Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining the quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga

CONTRIBUTION TO GOVERNMENT

- contribution to the prime minister's national relief fund
- Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)]

DONATE TO DISASTER MANAGEMENT

ISS may contribute disaster management, including relief, rehabilitation and reconstruction activities

5. MODES OF IMPLEMENTATION

Sl. No.	Focus Area	Implementation strategy
1	Hunger, poverty, malnutrition and healthcare	Work with non-profit organizations at the infrastructure and/or operational level to support meal or nutrition related programs in schools and other institutions across India. Work with medical and health related organizations for projects in preventive healthcare, short term and long-term care and treatments.
2	Education	Partner with non-profit organizations, primary, secondary and higher educational institutions including schools, colleges, and universities to encourage efforts in a wide range of areas including training, provision of funding for continued education, skilling and re-skilling initiatives, offline and online education, research, infrastructure development and capacity building



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3	Environmental sustainability	i) Work with NGOs on safeguarding the environment, including protection of flora and fauna, promoting climate action, renewable energy, natural resource conservation as well as promoting resource efficiencies across energy, water and waste management ii) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
4	Contribute to Government	i) Contribution directly to the prime minister's national relief fund ii) Contribute directly to Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)]
5	Donate to Disaster Management	Contribute directly to disaster management, including relief, rehabilitation and reconstruction activities

6. UNDERTAKING CSR ACTIVITIES

ISS will undertake its CSR activities approved by the Board of Directors of the Company.

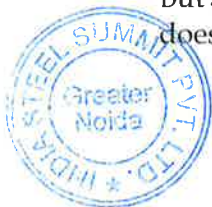
7. IMPACT ASSESSMENT

Impact assessment shall be undertaken by the Company or by recipient or by implementing agency as required by and in the manner set out under Applicable Law, and the impact assessment report(s) shall be placed before the Board and shall be disclosed as legally required.

8. COMPOSITION OF CSR COMMITTEE AND DISCLOSURES

As per Section 135 (1) of the Companies Act, 2013, every net worth of Rs. 500/ crore or more, turn over of Rs. 1000/- crore or more or net profit of Rs. 5 crores or more during the immediately preceding financial year shall constitute the CSR committee. Committee members shall be directors.

But as per Section 135(9) of the Companies Act, 2013, where the amount spent by the Company does not exceed Rs. 50 Lacs, the requirement of the CSR committee shall not be applicable.



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The functions of the CSR committee shall be in such cases, be discharged by the Board of Directors of the Company.

CSR contribution of ISS is not more than Rs. 50 Lacs. Hence ISS does not require to constitute a CSR committee.

9. INTERNAL WORKING COMMITTEE

Members of the internal working committee shall as be as follows: -

Mr. Yasunori Seki-GM-Finance & Accounts

Mr. Ravindran KA-GM (HR & GA)

Mr. Sitansu Sekhar Dash (Company Secretary)

This internal committee shall time to time monitor the CSR activities and report to Managing Director from time to time. A report will be presented before the Board of directors about the implementation of CSR activities.

10. GENERAL

- a) Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued by the Government, from time to time.
- b) The Company reserves the right to modify, add, delete or amend any of the provisions of this Policy.

For India Steel Summit Private Limited

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Tomotsugu Takashima

Managing Director

Date:- 25-08-2021

Place:- Greater Noida