

Corporate Social Responsibility Policy

(Approved by the Board of Directors)

Tata BlueScope Steel Private Limited (hereafter referred as "The Company") has always endeavoured to conduct its business responsibly, mindful of its social accountability, respecting laws of the land and human rights of communities it serves.

In accordance with the provisions of the Companies Act, 2013 and the rules made thereunder, the Company will allocate funds towards CSR activities to improve the quality of life of the communities it serves and to sustain and improve a healthy and prosperous environment. The company shall positively impact and influence its employees and partners in fostering a sense of social commitment for their stakeholders.

Vision

The Company's long-term CSR objective is **to improve the quality of life of the communities it serves.**

Scope

The Company's CSR will focus on four thrust areas – **Education, Healthcare, Quality of Life and Environment**. The Company may undertake CSR activities in other areas as per assessed needs of communities around it and as approved by the CSR Committee from time to time.

CSR Project Execution Model

CSR is a Board-driven process and the Board of the Company is empowered to plan, decide, execute, and monitor the CSR activities of the company based on the recommendation of its CSR Committee. The CSR team is responsible for project design and execution (Refer Annexure 1)

The Company may undertake CSR activities on its own or through registered organizations (Section 8 Company, registered public trust or registered society, registered under Section 12A and 80G of the Income Tax Act), Government bodies, Educational institutes and Industry associations – individually or as a consortium – to design, fund, implement and review CSR projects. Such organization or implementing agency has to ensure that CSR-1 registration is obtained from the Ministry of Corporate Affairs.

Target Communities and Geographies

While the Company will ensure that all communities benefit from our CSR activities, it would focus on those groups that are socially and economically marginalized. These would include Women, Children, Senior Citizens, Differently Abled individuals, Destitutes etc.

The Company's CSR activities will primarily be focused in urban as well as rural areas in the vicinity of its business operations. The Company may also undertake CSR activities based on the needs of the community in other geographies as recommended by the CSR Committee and approved by the Board from time to time.

The Company shall aim to integrate its CSR efforts with its Affirmative Action directives (as defined in Annexure 2).

Guiding Principles

The selection, implementation and monitoring of CSR activities will be according to six guiding principles – Impact, Partnerships, Affirmative Action, Volunteering, Business Connect and Communication. (Refer Annexure 2)

Impact Assessment

According to the rules under sec 135 of Companies Act 2013, as amended from time to time, impact assessment will be done in respect of CSR projects having outlays of Rs. 1 crore or more and which have been completed not less than one year before undertaking the impact study. Impact assessment Report shall also be provided by the CSR Committee to the Board, if applicable in any financial year.

Treatment of Funds

The Company will aim to utilize its stipulated funds for various CSR projects. In case any funds remain unspent relating to Ongoing Projects during a financial year, such funds will be transferred to special account to be opened in this regard and funds that remain unspent not relating to ongoing projects will be transferred to a Fund specified in Schedule VII of section 135 of Companies Act, 2013. Excess amount spent on CSR in a given financial year can be set off for up to 3 succeeding financial years with the approval of the Board.

'Ongoing Project' will mean a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.

Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account or to a Fund specified in Schedule VII, as the case may be.

Review of Policy

This CSR policy document will be reviewed from time to time by CSR Committee and any changes, if necessary, will be approved by the Board on the recommendation of the CSR Committee.



Anoop Kumar Trivedi
Managing Director

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Annexure 1: Implementation and Governance

In accordance with the provisions of the Companies Act, 2013 and the rules made thereunder:

1) The responsibilities of the Board of the company, inter-alia, include the following:

- Approve CSR policy and disclose contents of such policy in its report and also place it on the company's website
- Provide approach and direction for CSR implementation considering the recommendations of CSR Committee. Ensure that the activities included in the CSR policy are undertaken by the company.
- Approve Annual Action Plan on recommendation of the CSR Committee (note: the plan may be altered by the Board, if required with due process of law and appropriate justification at any time during the financial year)
- Ensure that the company spends its CSR budget every financial year
- Satisfy itself regarding the utilisation of the disbursed CSR funds
- Specify the reasons for not spending the amount and transfer the unspent CSR amount as per provisions of sections 135(5) and 135(6) of the Act

2) The CSR committee of the Board shall be responsible to:

- Recommend the CSR policy to the Board. Monitor the policy from time to time and provide suggestions to the Board, as applicable.
- Review and recommend to the Board, an Annual Action Plan formulated by CSR team in pursuance of CSR policy.
- Monitor the implementation of the project in line with the approach and direction given by the Board with reference to the approved timelines and year-wise allocation and make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- Ensure that the funds so disbursed are utilized for the purposes and in the manner as approved by the Board and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- Approve utilisation of funds from the Unspent CSR Fund Account for the Ongoing projects approved by the Board for reporting purpose and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- Ensure that Administrative Overheads and Impact Assessment do not exceed 5% each of total CSR expenditure of the company for the financial year and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

3) Role of the Chief Financial Officer (CFO) or the person responsible for financial management

CFO or the person responsible for financial management shall certify that the CSR spends are utilized for the purpose and in the manner as approved by the Board.

4) CSR team shall be responsible to:

- Formulate and recommend to the CSR Committee, the CSR policy and Annual Action Plan in pursuance of the CSR policy including list of projects, manner of execution, schedules, utilization of funds, monitoring and reporting mechanisms etc.
- Support the CSR Committee to govern and review the CSR activities of the company from time to time
- Provide regular inputs for the Director's Report and Annual report as per requirements of section 135 of Companies Act, 2013



Annexure 2: Guiding Principles for CSR

Impact

All CSR initiatives will have well-defined KPIs to measure impacts on the target groups. Feedback will be a key input for redesign and / or rollout of further initiatives.

Partnerships

The Company may engage closely with Tata Steel Limited / BlueScope Steel Limited/ Tata Trusts and work jointly on projects which are aligned to its CSR strategy and in its operational areas. The Company will also leverage the products and services of group companies for its CSR initiatives in alignment with its CSR strategy.

Affirmative Action

The Company will design targeted interventions for Scheduled Castes and Scheduled Tribes to promote Education, Employability, Employment and Entrepreneurship. The Company will also work on promoting Ethnicity to preserve the cultural fabric of these communities.

Volunteering

The Company will encourage to providing opportunities to its employees and their families to engage in volunteering that will benefit the communities in which they live and work, and at the same time, support the Company's own CSR activities. This will not only deepen local community connect but will also leverage in- house skills in addressing social challenges, thereby creating both social and business impacts.

Expertise

The Company will aim to undertake more projects within its own area of expertise i.e. prefabricated steel and building construction. The execution of such projects will be through the Company's authorized service providers.

Communication

The Company will have a two-way communication channel, so that the stakeholders' needs, expectations and aspirations can be mapped and their feedback and satisfaction levels can be obtained and assessed for the purpose of design and improvement of initiatives.