

APL METALS LIMITED
APL Corporate Social Responsibility Policy (CSR Policy)

1. Context

The Company has developed its CSR Policy in accordance with Section 135 of the Companies Act 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 notified by the Ministry of Corporate Affairs, Government of India. This Policy, henceforth called “APL CSR Policy”, underlines the guiding principles and mechanisms for undertaking various CSR activities/ programs by the Company.

The company has constituted CSR Committee to assist the Board in carrying out its responsibility within the framework of social needs, legal and regulatory compliances by adopting acceptable best practices.

2. Objectives

The objectives of the APL CSR Policy are to:

- Increasingly contribute to activities that are beneficial to the society and community at large.
- Chart out a mechanism for undertaking CSR activities directly or engaging approved external agency to carry out such activities in compliance to the existing and up dated legal and regulatory requirements.

3. Organization Mechanism

3.1 Composition of the CSR Committee:

The CSR Committee shall be constituted by the Board of Directors of the Company pursuant to the provisions of Section 135 of the Companies Act, 2013, as amended from time to time. The Company Secretary shall act as the Secretary for organizing meeting; keeping records of minutes and such other responsibilities as may be decided by the Board.

3.2 Roles and responsibilities of the CSR Committee

- (i) The CSR Committee comprising of its members and one chairman/person shall be responsible for formulating the CSR Policy and proposing revisions as and when required subject to the approval of the Board of Directors.
- (ii) Proposing budget allocation for the CSR activities, subject to the approval of the Board of Directors.
- (iii) Identifying modalities of implementing the CSR activities.
- (iv) Formulation of an effective monitoring system and monitoring the progress of the CSR programs on a regular basis.
- (v) Review of the impact assessment.
- (vi) Annually report to the Board, the status of CSR activities and contributions made for disclosure and reporting compliances.

4. Areas of Focus

Appendix – I of APL CSR policy lists out the detailed CSR activities to be implemented by the Company. Such list is indicative and not exhaustive in nature. Also the CSR activities undertaken shall not be in pursuance of the normal course of business of the Company. Further, the programs or activities that benefit only the employees of the Company or their families shall not be considered as CSR activities.

The Board of Directors and / or the CSR Committee reserve the right to modify, alter or otherwise update the Appendix -I from time to time, and as it deems fit. If there is any inconsistency between APL CSR Policy, Appendix-I and / or the Indian regulations, the requirements of the Indian regulations shall prevail. In such a scenario, the Board of Directors

and / or the CSR Committee shall modify, alter or update the APL CSR Policy and /or Appendix -I to ensure it meets the requirements of such regulations.

The CSR Committee of Directors (hereinafter referred to as the “CSR Committee”) will decide on the activities to be undertaken in each financial year and the budget allocation for the same.

5. CSR Fund

5.1 Total Amount

The total amount allocated for the expenditure on CSR activities (“CSR Fund”) for each financial year by APL’s CSR Committee may include the following:

Minimum Two (2) per cent of the average net profits before tax of APL made during the three (3) immediately preceding financial years, calculated as per Section 198 of the Companies Act, 2013; read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

5.2 Any income arising there from.

Any surplus arising out of the CSR projects or programs shall not form part of the business profit of the Company. The CSR Committee would determine how much of the CSR Fund is to be spent and allocated to various CSR activities to be undertaken in each financial year and obtain necessary approvals from the Company’s Board of Directors, if required.

5.3 The CSR Committee shall endeavor to give preference to the local areas around which the Company’s offices and factories are situated for the CSR activities.

6. Implementations

The CSR Committee may recommend implementation of the CSR programs by one or more of the following methods:

- (i) directly by the company; and/or
- (ii) by a registered trust or a registered society or a Section 8 company established by the Company, its Holding Company, subsidiaries or associate companies.
- (iii) through program implementation agencies that is a registered trust or a registered society or a Section 8 company recognized by the relevant legislation for implementation of CSR activities pursuant to the Companies Act, 2013; and/or
in collaboration with other companies, in a manner that APL CSR Committee is able to report separately on such projects/programs; and/or
- (iv) any other method as may be deemed appropriate from time to time or on a case to case basis.

7. Monitoring and Evaluation Framework

For each CSR activity/program approved under this CSR Policy, the suggested framework for monitoring and evaluation will be as per the recommendations of the High Level Committee set up by the Ministry of Corporate Affairs, Government of India, to suggest measures for improved monitoring of the implementation of CSR policies by companies under Section 135 of the Companies Act, 2013.

8. Amendments

The CSR Policy may be amended by the CSR Committee, as and when required, subject to the approval of the Board of Directors of APL

APL METALS LIMITED
APL Corporate Social Responsibility Policy (CSR Policy)

Appendix- I

List of CSR activities which may be undertaken by the Company (APL Metals Limited)

- eradicating hunger, poverty and malnutrition, (promoting health care including preventive health care) and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- enduring 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 including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga;
- 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;
- measures for the benefit of armed forces veterans, war widows and their dependents.
- Training to promote rural sport, nationally recognized sports, Paralympics sports and Olympic sports;
- Contribution to the Prime Minister' 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;
- Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- Rural development projects;
- Any other projects or activities as may be approved by the Central Government pursuant to section 135 of the Companies Act, 2013, from time to time.

--END--

Note: The above CSR Policy of APL Metals Limited was recommended by CSR Committee and approved by Board at their Meeting held on 18th May, 2018.