

# AVON STEEL INDUSTRIES PRIVATE LIMITED

## CSR POLICY

### Introduction

At Avon Steel Group, the Corporate Social Responsibility (CSR) has been an integral part of the way we have been doing our business since inception. For more than 40 years, the Group's CSR initiatives have played pivotal role in improving the lives of the communities and society at large and in & around our operations with an objective to energize, involve and enable them to realize their potential. This has also enabled us to fulfill our commitment to be a socially responsible corporate citizen. We had founded in year 1973 a hospital under the name of S. Nihal Singh Pahwa Charitable Hospital with the aim to alleviate the sufferings of the ailing humanity in the thickly populated industrial belt. The hospital initially catered only to outdoor patients. It was in the year 1976 that the indoor wards were inaugurated. Today the hospital has risen to a 200 bed institution including Deluxe, private and semi private rooms, burns unit, ICCU, Ultra Sound Services, Physiotherapy, Ultra Modern Labs, Blood Bank, Ortho, Eye Care, ENT, Dental, Gynae, Medicine and Surgery Departments.

### I. Objectives

The main objectives of Company's CSR policy are

- to lay down guidelines to make CSR a key business process for sustainable development of the society.
- to directly/indirectly undertake projects/programs which will enhance the quality of life and economic well-being of the communities in and around our plant and society at large.
- To generate goodwill and recognition among all stake holders of the company.

### II. Our Responsibilities

We strive to achieve our vision by investing in technology, innovation, optimizing human capital and productivity. We remain committed to protecting and nurturing nature. We strongly believe that our business is governed by concern to environment, energy conservation, safe work practices within and outside our premises and responsibility towards external and internal stakeholders. We take deliberate steps to bring culture of innovation while choosing technology, implementing internal processes, managing people, developing product basket and dealing with our customers. There is no conflict between our outward actions and internal values. There is consistency in our actions, values, methods, measures, principles, expectations and outcomes. We firmly rely on integrity, strength, ability and character of individuals and organization while conducting our business. We trust our resources and clients for common good.

### III. CSR Policy

The company can include any of the following activities in their CSR policy to spend the requisite amount:

- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- Promoting 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 centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- 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;
- 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 sports, nationally recognized sports, Paralympics sports and Olympic sports;
- Contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- Contributions or funds provided to technology incubators located within academic institution which are approved by the Central Government;
- Rural development projects.
- Slum area development
- Disaster management, including relief, rehabilitation and reconstruction activities.

#### **IV. Implementation**

The Company shall carry out its CSR activities through

1. A registered trust or a registered society or a company established by the Company or its holding or subsidiary or associate company under section 8 of the Companies Act, 2013.
2. Contribution/donation made to such other Organizations/Institutions /funds as may be permitted under the applicable laws from time to time.
3. Directly by the Company for fulfilling its responsibilities towards various stakeholders as permitted under the applicable laws, from time to time.
4. In collaboration with other Companies undertaking projects/programs in CSR activities. The CSR Committees of respective companies should be in a position to evaluate and report separately the progress of such projects/programs.
5. Any other institutes, NGOs, Government, Semi-government, autonomous bodies, trusts etc. However, any such projects/program to be undertaken through these entities shall have an established track record of 3 years of undertaking such projects/programs.

The time period/duration of each project/programs shall depend on its nature, extend of coverage and intended impact of such activity.

## V. Exclusion from CSR

The following activities shall not form part of the CSR activities of the Company :

1. The activities undertaken in pursuance of normal course of business of a company.
2. CSR projects/programs or activities that benefit only the employees of the Company and their families
3. Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
4. Any CSR projects/programs or activities undertaken outside India.

## VI. CSR Committee

The Company has formed CSR Committee as per the applicable laws and the committee is responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy. The CSR Committee shall submit periodical reports to the Board of Directors.

The present composition of the committee is as under:

S.No.	Name	Designation
1	Chetan Singh Pahwa	Managing Director
2	Mandeep Ahluwalia Pahwa	Director
3	Kamla Pahwa	Director

## VII. CSR Expenditure

CSR expenditure will include all expenditure, direct / indirect incurred by the company on CSR program undertaken in accordance with the approved CSR Plan. The Committee shall endeavor to spend at least 2% of the average net profit during the three immediately preceding financial years on CSR activities as enumerated above. Any surplus arising out of the contribution made for CSR Activities shall not form part of the business profit of the Company and redeployed for such activities.

## VIII. Monitoring & Reporting

The CSR Committee will be responsible for the continuous monitoring of CSR activities and report to the Board from time to time.

The CSR Committee has the power to :

1. Seek monitoring and implementation report from the Organizations receiving funds.
2. Delegate a designated Company official to co-ordinate with the Organization receiving funds to inspect the activities undertaken and ensure information in a timely manner.

## IX Disclosures

The Annual Report of the Company will include a section on CSR outlining the CSR Policy, CSR Committee, CSR initiatives undertaken by Company, the CSR spend during the financial year and other information as required by the prevailing law.