

CORPORATE SOCIAL RESPONSIBILITY POLICY
OF GANDHI SPECIAL TUBES LIMITED

Philosophy

Gandhi Special Tubes Ltd. always seeks ways to make a positive and lasting impact on society through our various CSR activities. Education, Healthcare, Natural Calamity Aid, and financial assistance to underprivileged sections remain the core pillars of Gandhi Special's CSR philosophy. We strongly believe in uplifting the weaker and marginalized sections of the society by creating long-term social, economic and environmental value.

CSR Committee

CSR Committee shall be constituted from time to time as per the applicable laws and the committee shall be 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.

As on the date of revision of the policy* following are the members of the CSR Committee:-

Mr. Manhar G. Gandhi	Chairman
Mr. Jayesh M. Gandhi	Member
Ms. Bhavi J. Koradia	Member

CSR Budget

The total budget for the CSR projects will be decided by the CSR Committee and approved by the Board.

CSR Activities

The scope of the CSR activities of the Company will extend to specific projects/ programs or areas as permitted under Section 135, rules framed there under and Schedule VII to the Companies Act, 2013 from time to time and as may be decided by the Committee with the approval of the Board of Directors. The Company may carry out following activities either its own or through recognized and eligible trusts and social and welfare institutions:-

Sr. No.	Area	Activities/Initiatives/ programmes
1.	Promoting education	Providing financial assistance and scholarships for higher education to underprivileged children who are unable to pursue further studies. Ensure proper education to children.
2.	Contribution/Financial Assistance in areas affected with natural calamities	Company aims at providing financial assistance to the regions affected with natural calamities like floods, draughts, epidemic etc.
3.	Financial and Medical assistance	Company aims to provide proper and standard health care assistance and financial assistance to underprivileged section of society who are unable to afford proper and standard health care services.
4.	Any other Activities	*Any other activities as may be amended from time to time by the Ministry of Corporate Affairs in Schedule VII of the Companies Act,2013.

*inserted under the approval of the Board of Directors on 12th August, 2020.

The Company shall undertake CSR Activities only in India and the preference shall be given to the local areas and areas where the Company's Registered Office or factory is situated.

***Annual Action Plan of CSR Activities**

The followings shall be the parameters for the Annual Action Plan:

- 1) Provide high quality products.
- 2) Strengthen Risk Management
- 3) Nurture relationships of trust with our suppliers
- 4) Respect human dignity (Human Rights, Labour Practices, Safety, Health)
- 5) Create good relations with communities
- 6) Contribute to the Environment through Corporate Activities

A specific budget will be allocated for CSR activities. This budget will be in accordance with the tenets of Section 135 of the Companies Act 2013 and project driven. Utilisation certificates, as appropriate will be sought for all projects implemented by registered partners.

Any surplus arising out of the CSR activities, if any, will not form part of the Profit and Loss Account and any surplus will be spent for specified activities in addition to the

budget fixed as per the norms of the Companies Act, 2013 and Companies (Corporate Social Responsibility) Rules, 2014 herein after referred to as Rules.

The Board of Directors of the Company, upon recommendation of CSR Committee, will consider and approve the Annual Action Plan of the Company for CSR activities and amount to be spent on each specified activities or project(s) before the beginning of the each financial year i.e. April to March.

*inserted under the approval of the Board of Directors on 08th February, 2021.

Implementation of CSR Activities

- i. The Company may undertake CSR Activities through a registered trust or society or any company, established by the Company, its holding or subsidiary company under Section 8 of the Act for such non-for-profit objectives.
- ii. The Company may collaborate with any other companies for undertaking the CSR Activities.
- iii. The Company may build CSR capabilities of its personnel as well as those of implementing agencies through institutions with established track records of at least three financial years.
- iv. The Company may undertake CSR Activities by way of helping needy individual and/ or Group of Individuals.
- v. Salaries paid by the Company to regular CSR staff as well as to volunteers of the Company (in proportion to Company's time/ hours spent specifically on CSR) shall be factored into CSR project cost as part of the CSR expenditure.
- vi. The Company shall not make any payment directly or indirectly to Political Party(ies) for CSR Activities.

****Display of CSR Activities on its Website**

CSR Activities undertaken by the company are to be displayed on the website through pictures or in any other mode.

**inserted under the approval of the Board of Directors on 08th February, 2021.

CSR Committee's Responsibility

- Formulate and update our CSR Policy, which will be approved by the Board of Gandhi Special Tubes Limited.
- Approve activities that are in line with the CSR policy.
- Put monitoring mechanisms in place to track the progress of each project.
- Recommend the CSR expenditure to the Board who will approve it.
- Meet atleast once in a year to review the progress made.

- To formulate and recommend to the Board, an Annual Action Plan in pursuance of its CSR Policy, which shall include the following, namely:-
 - (a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - (b) the manner of execution of such projects or programmes as specified in CSR Rules;
 - (c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - (d) Monitoring and reporting mechanism for the projects or programmes; and
 - (e) details of need and impact assessment, if any, for the projects undertaken by the company:

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect”.

Treatment of Surpluses

Any surplus generated from CSR projects undertaken by us will be tracked and channelized into our CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.

****Transfer of Unspent CSR Amount*

The amount which remains unspent under CSR activities will be transferred to the specified fund under schedule VII to the Companies Act, 2013 in accordance with the provisions of Section 135 of the Act and Rules framed thereunder.

***inserted under the approval of the Board of Directors on 08th February, 2021.

Disclosures

The Annual Report of the Company 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.

General

1. This Policy documents has been approved by the Board of Directors at their meeting held on October 30, 2014 and further amended by the Board of Directors at their meeting held on August 12, 2020 and February 08, 2021 respectively consequent upon recommendation of the CSR Committee.
2. The policy may be amended from time to time as may be required either under the Companies Act, 2013 or Rules for the Corporate Social Responsibility.
3. Words and expressions used and not defined in this Policy shall have the same meanings respectively assigned to them in the Act and the Rules.



Gandhi
Special Tubes Ltd.
