

Deem Roll-Tech Limited  
Corporate Social Responsibility Policy

Introduction

Deem Roll-Tech Limited [the company] is a public limited company and is one of the leading manufacturers of steel rolls, which constitute the building blocks for the iron and steel rolling mills industry. The company's Corporate Social Responsibility Policy [the CSR Policy] has been developed in accordance with the provisions of Section 135 of the Companies Act 2013 and the Companies [Corporate Social Responsibility] Rules, 2014 as amended from time to time [collectively referred to as the Act].

CSR Vision

The company is committed to improving the lives of the communities in which it operates in a sustainable way and aspires to be a responsible corporate citizen by undertaking CSR activities/programmes/projects, in true letter and spirit. The company will always endeavour to build relationships of trust with local communities, society and stakeholders as a good corporate citizen and to contribute to developing a sustainable society for future generations.

Objectives of CSR Policy

The CSR Policy, formulated in alignment with the abovesaid vision, lays down guidelines and mechanisms to be adopted by the company in order to carry out CSR activities/programmes/projects. All the CSR activities/programmes/projects will be conceived and implemented through a focused approach towards target beneficiaries for generating maximum impact. In implementing its CSR activities/programmes/projects the company may choose to partner or take up the same through a registered trust, society or a Section 8 company under the Act and other applicable laws.

Applicability and Review

The CSR Policy shall apply to all the CSR activities/programmes/projects to be undertaken by the company. The Board of Directors [the Board] shall have powers to review and make revisions in the Policy as and when considered appropriate.

CSR Budget

The CSR Budget will be allocated as per the provisions of the Act i.e., at least 2% of the average net profit calculated as per Section 198 of the Act accrued during 3 immediately preceding Financial Years.

CSR Activities

The company shall undertake CSR activities/programmes/projects that are aligned with those listed in Schedule VII of the Act.

The CSR activities/programmes/projects undertaken by the company will not, however, include the [a] activities which benefit only the employees of the company and their families [b] contribution to any political parties [c] activities undertaken outside the country.

Governance Structure

The governance structure for CSR activities/programmes/projects undertaken by the company shall be as below:

Board of Directors

The Board shall perform the functions as per the provisions of the Act which shall include :

- [i] setting up the CSR Committee as per the provisions of the Act as also appointing or replacing of Directors on the CSR Committee
- [ii] approving the CSR Policy and revisions therein
- [iii] ensuring that in each financial year the company spends at least 2% of the average net profit made during the 3 immediate preceding financial years

[iv] ensuring that every financial year funds are committed for CSR activities/programmes/projects are utilized effectively and there is regular monitoring of the implementation

[v] disclosing in its annual report the names of CSR Committee members, and ensure reporting of its CSR activities/programmes/projects on the company's website and

[vi] ensure annual reporting of CSR activities/programmes/projects etc. in the format and the manner as prescribed from time to time under the Act.

#### CSR Committee

Pursuant to the provisions of the Act, the Board will constitute the CSR Committee which will consist of 3 Directors one of whom shall be Independent Director. The Board will have powers to appoint or replace Directors on the CSR Committee as and when considered necessary.

The CSR Committee shall perform the functions as per the provisions of the Act which shall include:

[i] formulating and recommending to the Board the CSR Policy and revisions therein

[ii] identifying and recommending to the Board the CSR activities/programmes/projects to be undertaken as per Schedule VII of the Act and the expenditure to be incurred on their implementation

[iii] identifying the engaging with partners such as Trusts and NGOs etc. for implementation of the CSR activities/programmes/projects through them

[iv] formulating a monitoring mechanism for ensuring implementation of the CSR activities/programmes/projects undertaken

[v] reporting to the Board on the progress of the various CSR activities/programmes/projects and amounts spent.

#### Planning and Implementation

The company's CSR activities/programmes/projects will, to the extent possible, include components such as:

[i] clearly defined objectives developed out of existing societal needs or determined through baselines / studies / research, where considered necessary / feasible

[ii] identified sectors, geographies and target group / beneficiaries

[iii] milestones and timelines

[iv] specification of annual financial allocation

[v] monitoring system

[vi] reporting framework and system

The mode of implementation of CSR activities/programmes/projects will include a combination of direct implementation and/or through implementing agencies. When the particular CSR activities/programmes/projects is to be implemented through the agency/ies, the company will select the implementing agency/ies after appropriate consideration. The company may use services of expert agencies, consultancy firms etc. wherever required for carrying out surveys, guidance on project design and implementation, impact assessment surveys, etc.

#### Monitoring and Reporting Mechanism

A comprehensive monitoring and reporting mechanism shall be devised by the company to ensure that all the activities/programmes/projects are duly implemented as per the CSR Policy. The CSR Committee shall monitor the approved activities/programmes/projects. The monitoring and reporting mechanism will include programme review, evaluation, documentation and reporting.

[Approved by the Board of Directors at the Meeting No. 6/2023-24 held on 31st July, 2023]