



CORPORATE SOCIAL RESPONSIBILITY POLICY
OF GANDHI SPECIAL TUBES LIMITED

Philosophy

Gandhi Special Tubes Limited strongly believes that Society is one of the stakeholders and has been discharging its Corporate Social Responsibility.

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 adoption 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.

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.



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.

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.

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 30th October, 2014 and further amended by the Board of Directors at their meeting held on August 12, 2020 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.
