

**SAMPAT ALUMINIUM LIMITED**  
**(Formerly known as SAMPAT ALUMINIUM PRIVATE LIMITED)**  
**CIN: U27203GJ1999PLC036129**  
**REG. OFF.: 265, RAKANPUR, OPP. MANPASAND WAYBRIDGE, RAKANPUR,**  
**KALOL, GANDHINAGAR, GUJARAT-382721, INDIA**  
**EMAIL ID: [deorawires@gmail.com](mailto:deorawires@gmail.com) | MOBILE NO: +91 9825081914**

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## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

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## ❖ INTRODUCTION

*Sampat Aluminium Limited (Formerly known as Sampat Aluminium Private Limited)* is a public limited company and is one of the leading manufacturer of all kind description, Class of Aluminium scrap and ingots, Aluminium Alloy scrap and ingots, Aluminium Road, Aluminium Alloy rod, and other ferrous and non-ferrous metal scrap, ingots and rod and of cold and hot rolling, rerolling, slitting, edge milling, sheeting, stamping, processing, extruding drawing, flatering, straightening, heat treatment of ferrous and non-ferrous metal, etc...

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. The company aspires to be a responsible corporate citizen by contributing to nation building through CSR projects and programmes, in true letter and spirit.

The CSR Vision of the company is to build relationships of trust with local communities, society and stakeholders as 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 above said vision of the company, lays down guidelines and mechanisms to be adopted by the company in order to carry out CSR projects and programmes.

All the CSR projects and programmes will be conceived and implemented through a focused approach towards target beneficiaries for generating maximum impact.

In implementing its CSR projects and programmes the company may choose to partner with a registered trust, society or a Section 8 company that fulfil the requirements of Section 135 of the Act.

## ❖ APPLICABILITY AND REVIEW

The CSR Policy shall apply to all the CSR projects and programmes to be undertaken by the company.

The Board of Directors [the Board] shall review the CSR Policy once in a year and may amend the same as may be considered appropriate. The Board may review and make changes in the Policy at any other intervals in the event of any changes in the Act.

## ❖ 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

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Years.

#### ❖ CSR ACTIVITIES

The company shall undertake CSR projects and programmes that are aligned with the activities listed in Schedule VII of the Act, within the geographical limits of India.

The following activities are listed in Schedule VII of the Act.

- (i) eradicating extreme hunger and poverty
- (ii) promotion of education
- (iii) promoting gender equality and empowering women
- (iv) reducing child mortality and improving maternal health
- (v) combating human immunodeficiency virus, acquired immune deficiency syndrome, malaria and other diseases
- (vi) ensuring environmental sustainability
- (vii) employment enhancing vocational skills
- (viii) social business projects
- (ix) contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and funds for the welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women and
- (x) such other matters as may be prescribed

The CSR projects and programmes will not, however, include the following:

- [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 projects and programmes undertaken by the company shall be as below:

##### • BOARD OF DIRECTORS

The Board of the company will be responsible for:

- [i] setting up the CSR Committee as per the Act
- [ii] approving the CSR Policy
- [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 committed by the company for CSR projects and programmes are utilized effectively and there is regular monitoring of the implementation [v] disclosing in its annual report the names of CSR Committee members, the content of the CSR Policy and ensure annual reporting of its CSR projects and programmes on the company website and

[vi] ensuring annual reporting of CSR Policy to the Ministry of Corporate Affairs, Government of India, as per the prescribed format, if required

#### • **PLANNING AND IMPLEMENTATION**

The company's CSR projects and programmes 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] robust monitoring system
- [vi] reporting framework and system

The mode of implementation of CSR projects and programmes will include a combination of direct implementation and through implementing agencies.

When the particular CSR project or programme is to be implemented through the agency, the company will select the implementing agency/ies after appropriate due diligence.

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**

A comprehensive monitoring framework shall be devised by the company to ensure that all the projects and programmes are duly implemented as per the CSR Policy.

The CSR Committee shall monitor the approved projects and programmes.

The monitoring and reporting mechanism will include program review, evaluation, documentation and reporting.

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**FOR, SAMPAT ALUMINIUM LIMITED**  
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**SANKET SANJAY DEORA**  
**MANAGING DIRECTOR**  
**DIN: 01417446**

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