

SEETA ENERGEN PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

(As approved by the Board of Directors on 20th December, 2024)



PREAMBLE:

While Seeta Energen Private Limited (hereinafter referred to as ‘the Company’) continues to expand and grow in its sector of business, it has not lost sight of its commitment to play its role as an enlightened corporate citizen. Corporate Social Responsibility has always been on its agenda. At Seeta Energen Private Limited, Corporate Social Responsibility (“CSR”) has evolved with the simple objective of **‘giving back to the society.’** The Company’s primary business is to establishment of thermal power plant, hydraulic power plants, atomic power plants, wind power plants, solar power plants & other power plants based on any source of energy and buy, sale, trade and deal in Iron ore, Iron ore pellets, Iron ore fines coal, coke, coal fines, manganese ore, bauxite and other natural minerals and fines, sponge iron, pig iron, billets, ingots, TMT and other minerals. The CSR activity through which the company defines its relationship with the common stakeholders and the community for the social and the environmental good aims to work towards the elimination of all barriers for the social inclusion of disadvantaged groups – such as the poor, socially backward and financially excluded group of persons. CSR activities are carried out in an environment friendly manner.

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The CSR policy will serve as a guiding document and help the Company to identify, monitor and execute the CSR projects and keep it within the spirit of this policy.

This policy will act as a self regulating policy and will comply with all the provisions of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, as may be amended from time to time. Section 135 of Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules 2014, mandates every company having a Net Worth of Rs. 500 Crores or more or having a turnover of Rs. 1000 Crores or more or a Net Profit of Rs. 5 Crores or more during the immediately preceding financial year to spend in every financial year at least 2% of its average net profits of immediately three preceding financial years. The company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility activities. This policy will be applicable to the Company and guide its obligations as a responsible member of society along with enhancing its relationships with all its stakeholders and communities including its employees based on the laws and regulations applicable on the Company.

DEFINITIONS AND INTERPRETATIONS:

- a) **"Act"** means Companies Act, 2013 read with Rules made there under, as amended from time to time.
- b) **"Company"** means the Seeta Energen Private Limited.
- c) **"Chairman"** means Chairman of CSR Committee.
- d) **"CSR Committee or Committee"** means Corporate Social Responsibility Committee of Board of Directors of the Company constituted under Section 135 of Companies Act, 2013.
- e) **"Board"** means Board of Directors of the Company.
- f) **"Employee"** means employee of the Company whether employed in India or outside India.
- g) **"Policy"** means Corporate Social Responsibility Policy.

Words and expressions used and not defined in this Policy but defined in the Act and rules and regulations made there under shall have the meanings respectively assigned to them in the Act and rules.

CORPORATE SOCIETY RESPONSIBILITY Policy:

This policy, which encompasses the Company's philosophy for define its responsibility as *a corporate citizen* and lays down the guidelines and mechanism for undertaking socially useful Programmes in the best interests of the company, its employees, its shareholders, the community and for the protection of environment welfare & sustainable development of the community at large.

This policy shall apply to all CSR initiatives, for the benefit of different segments of the society.

CSR ACTIVITY:

Apart from the below mentioned activities, CSR Committee of the Board is authorized to consider activities which may be approved by the Government from time to time.

The policy objectives of the Company as per Schedule VII of Section 135 of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014, are as follows:

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventinve health care, and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- ii. Promoting education including special education and employment enhancing vocational skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- iii. 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;
- iv. 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;

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- v. Protection of natural 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;
- vi. Measures for the benefits of armed forces veterans, war widows and their Dependents Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- vii. Training to promote rural sports, nationally recognised sports, paraolympic sports and Olympic sports;
- viii. Contribution to the Prime Minister's National Relief Fund or or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women; and
- ix. (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);
- x. Rural Development projects;
- xi. slum area development;
- xii. disaster management, including relief, rehabilitation and reconstruction activities

Such other projects or programs in pursuance of recommendations of the CSR Committee in line with the rules, regulations and applicable provisions of the Companies Act, 2013.

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CORPORATE SOCIETY RESPONSIBILITY COMMITTEE:

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR shall be appointed by the Board of Directors of the Company which must consist of at least two or more Directors. Accordingly, the constitution of CSR Committee formed by company is as follows:

| SR. NO. | NAME OF MEMBER | DESIGNATION |
|----------------|-----------------------|--------------------|
| 1. | Mr. Neeraj Agrawal | Chairman |
| 2. | Mr. Rahul Agrawal | Member |

The Board shall have the power to make any change(s) in the constitution of the Committee.

The CSR Committee to, inter alia, carry out the following functions;

- Formulate and recommend to the Board, a CSR Policy indicating therein CSR activities to be undertaken by the company;
- Recommend the amount of expenditure to be incurred on CSR activities;
- Monitor the CSR Policy of the Company from time to time and institute a transparent monitoring mechanism for implementation of the CSR projects/programs/activities undertaken by the Company.
- Recommend the CSR Budget
- Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules
- Create transparent monitoring mechanism for implementation of CSR initiatives in India
- Submit the Reports to the Board in respect of the CSR activities undertaken by the Company
- Monitor CSR Policy from time to time
- Such other functions as the Board may deem fit, in accordance with the Section 135 of the Act and Schedule VII of the Act and rules thereof as applicable from time to time.

CSR BUDGET/ CSR SPEND:

The Act mandates companies meeting the qualification criteria to allocate two percent of Average net profits (before tax) during the three immediately preceding financial years, pursuant to section 135(5) of the Companies Act, 2013, to be spent on CSR Activities that fall under purview of Schedule VII of the Act:

✓ **CSR Expenditure:**

Net profit means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

✓ **Expenditure on CSR capabilities**

The Company may build CSR capabilities of their own personnel as well as of their Implementing Agencies and ensure that the administrative overheads shall not exceed 5 percent of total CSR expenditure of the company for the financial year, as stated in the Rules, and amended from time to time.

✓ **Failure to spend the CSR Money**

In case the Company fails to spend the above targeted amount in that particular financial year, the Committee shall submit a report in writing to the Board of Directors specifying the reasons for not spending the amount which in turn shall be reported by the Board of Directors in their Directors' Report for that particular Financial Year and Surplus (if any) arising out of the CSR initiatives shall not form part of the business profits of the Company.

CSR REPORTING:

The Board in its Annual Report shall include the details of the CSR activities undertaken in the Financial Year. The particulars to be stated in the report shall be in the prescribed format in rule, regulation and provisions of the Companies Act, 2013.

CONCLUSION:

The CSR Committee shall be responsible for the administration, interpretation, application and review of this policy. The Chairman of the CSR Committee also shall be empowered to bring about necessary changes to this Policy, if required, at any stage with the concurrence of the Board.