



Creative Castings Limited

CORPORATE SOCIAL RESPONSIBILITY POLICY **("CSR Policy")**

(Approved by Board of Directors through Circular Resolution dated 1st September, 2023 and effective from same date)

1. PRELUDE:

Corporate Social Responsibility (CSR) is fundamentally a philosophy or a vision about the relationship of business and Society. The emerging concept of CSR goes beyond charity and requires the Company to act beyond its legal obligations and to integrate social, environmental and ethical concerns into Company's business process. Creative Castings Limited ("CCL") is committed to improve the lives of the society in which it operates and strives to create a positive impact on the communities it serves. We understand that there is a need to strike a balance between the overall objectives of achieving corporate excellence vis-à-vis the Company's responsibilities towards the community.

Pursuant to Section 135 of the Companies Act, 2013 and the rules made there under, which is effective from 1st April 2014, as amended from time to time, every Company which meets the criteria as mentioned in the Section shall constitute a CSR Committee of the Board for implementation of CSR projects or programs or activities undertaken by the Company. Further, as per Section 135(9) of The Companies Act, 2013, if the amount to be spent for CSR activities as provided in section 135(5) does not exceed Fifty Lakh Rupees, there is no requirement for constitution of CSR Committee and the functions shall be discharged by the Board of Directors of company.

This policy is designed to discharge the Company's responsibility as a corporate citizen and to lay down the guiding principles for selecting, implementation and monitoring mechanism for carrying out socially useful activities / projects and programs for welfare & sustainable development of community at large.

The terms, rules and regulations mentioned in this policy are as per the Companies Act, 2013 and rules made there under.

2. DEFINITIONS:

- i. "Act"** means the Companies Act, 2013 and the Rules framed thereunder including circulars, clarifications issued from time to time;
- ii. "Average Net Profit"** means profit calculated as per Section 198 of the Companies Act, 2013;



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- iii.* **“Annexure”** means Annexure appended to this Policy;
- iv.* **“Board”** means Board of Directors of the Company;
- v.* **“Company”** means Creative Castings Limited;
- vi.* **“CSR”** means Corporate Social Responsibility;
- vii.* **“CSR Activities”** means the activities or projects or programmes as recommended and approved by the Board, undertaken by the Company from time to time in any one or more of the areas falling under the Schedule VII to the Companies Act, 2013
- viii.* **“CSR Committee”** means the Committee of the Board constituted under section 135 of the Act. Until the constitution of this committee by the Board of Directors, the term "CSR Committee" shall be deemed to refer to the Board of Directors of the Company;
- ix.* **“CSR Policy”** means the Corporate Social Responsibility Policy as set out herein and as amended or modified from time to time;
- x.* **“CSR Rules”** means the Companies (Corporate Social Responsibility Policy) Rules, 2014 notified by the Government of India, Ministry of Corporate Affairs and any amendments made thereof from time to time;
- xi.* **“Implementing Agency”** means any entity specified under applicable provisions of the Act and CSR Rules (as amended from time to time) for undertaking CSR projects, programmes or other permitted activities, which is engaged by the company to implement various projects in pursuance of CSR Policy as approved by the Board from time to time.

Unless the Context otherwise requires, words and the expressions used in this policy and not defined herein but defined in the Companies Act, 2013 as may be amended from time to time shall have the same meaning respectively assigned to them therein.

3. OBJECTIVE OF THE POLICY:

The objectives of the Corporate Social Responsibility (CSR) Policy of our company is rooted in a commitment to address key societal challenges and promote sustainable development across various sectors, such as:-



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Eradicating Hunger, Poverty, and Malnutrition: Implement initiatives aimed at providing access to nutritious food, improving livelihood opportunities, and supporting sustainable agriculture practices to address hunger, poverty, and malnutrition in target communities.

Promoting Healthcare and Sanitation: Support healthcare projects focusing on preventive healthcare, access to healthcare services, and sanitation facilities, including contributions to the Swachh Bharat Kosh for promoting sanitation and ensuring availability of safe drinking water.

Promoting Education and Livelihood Enhancement: Facilitate educational opportunities for children, women, elderly, and differently-abled individuals, including special education and vocational skill development programs. Additionally, initiate livelihood enhancement projects to empower communities economically.

Promoting Gender Equality and Social Inclusion: Implement programs to empower women, provide shelter and support for women and orphans, establish facilities for senior citizens, and address inequalities faced by socially and economically backward groups.

Ensuring Environmental Sustainability: Contribute to environmental conservation efforts including protection of flora and fauna, promoting agroforestry, and conserving natural resources. Support initiatives such as the Clean Ganga Fund for rejuvenation of river Ganga.

Preserving National Heritage and Culture: Contribute to the preservation of national heritage, art, and culture through restoration of historical sites, setting up public libraries, and promoting traditional art and handicrafts.

Supporting Armed Forces Veterans and Dependents: Provide assistance and support to armed forces veterans, war widows, and their dependents, including Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans and widows.

Promoting Sports and Fitness: Support training programs to promote rural sports, nationally recognized sports, and Paralympic and Olympic sports to encourage physical fitness and sportsmanship among communities.

Contributions to Socio-Economic Development: Contribute to the Prime Minister's National Relief Fund, PM CARES Fund, or other central government



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funds aimed at socio-economic development and welfare of scheduled castes, tribes, other backward classes, minorities, and women.

Investment in Research and Development: Contribute to incubators or research and development projects in the fields of science, technology, engineering, and medicine, with a focus on Sustainable Development Goals (SDGs). Support public-funded universities and research institutions engaged in promoting SDGs.

Rural Development Initiatives: Implement rural development projects focusing on infrastructure development, livelihood enhancement, and community empowerment in rural areas.

Slum Area Development: Support slum area development projects aimed at improving living conditions, providing basic amenities, and promoting community development in designated slum areas.

Disaster Management and Relief Activities: Provide assistance for disaster management, including relief, rehabilitation, and reconstruction activities in areas affected by natural calamities, ensuring timely support and recovery efforts.

4. MODALITIES OF EXECUTION AND IMPLEMENTATION:

The Board may decide to undertake its CSR activities through:

- 4.1 Directly through itself by the Company; or
- 4.2 A Company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80G of the Income Tax Act, 1961 established by the Company, either singly or along with any other Company; or
- 4.3 A Company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- 4.4 Any entity established under an Act of Parliament or a State legislature; or
- 4.5 A Company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.



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Explanation- For the purpose of clause 4.4, the term “entity” shall mean a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act.

Notes:

- Every entity, covered under sub-rule (1) of rule 4 of CSR Rules, who intends to undertake CSR activity, shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar.
- Collaboration with other companies should be in such manner that the CSR Committees/Board of Directors of respective companies are in a position to report separately on such CSR activities in accordance with CSR Rules.
- The Company shall conduct due diligence prior to selection of an entity as its implementation agency, to *inter alia* verify the credentials and ensure that the proposed implementation agency is eligible and capable to be appointed as such.

5. RESOURCES, FUNDING & ALLOCATION:

- 5.1 The Company shall spend at least 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years in accordance with the Act and the Rules and the CSR Policy.
- 5.2 The CSR Committee/Board shall recommend the manner in which the CSR expenditure shall be incurred in a year, in accordance with the Act and the Rules and the CSR Policy.
- 5.3 The Board shall be responsible for sanctioning the CSR expenditure and for taking steps to ensure that the amount for the CSR expenditure is available to the Implementation Group for application towards the CSR Activities.
- 5.4 Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company and may only be re-allocated to the CSR Activities being undertaken in terms of this CSR Policy and the annual action plan for the financial year in which such surplus has arisen.
- 5.5 In order to count towards CSR Expenditure, CSR Activities must be undertaken in compliance with the applicable laws and shall not include the following:
 - activities undertaken in pursuance of normal course of business of the company;



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- any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
- contribution of any amount directly or indirectly to any political party under Section 182 of the Act;
- activities benefitting employees of the company as defined in clause (k) of Section 2 of the Code on Wages, 2019 (29 of 2019);
- activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services; and
- activities carried out for fulfillment of any other statutory obligations under any law in force in India.

5.6 Unspent CSR amount, if any, shall be treated in accordance with the applicable CSR Rules from time to time and where the Company has spent in excess of its CSR obligation, such excess spending shall be available for set off against the Company's CSR obligations for up to the next three financial years in accordance with applicable law, and the Board shall be competent to pass a resolution in this regard.

6. CSR ANNUAL ACTION PLAN AND LOCATION OF CSR EFFORTS:

The Board shall decide on the locations for CSR activities and formulate, recommend and approve a CSR annual action plan, which shall contain all matters which are required under applicable law and any other matters as it may deem fit from time to time.

The Board may also modify the annual action plan at any time during the financial year, based on reasonable justification.

The CSR activities (Projects/Programmes) which CCL plans or proposed to undertake shall be the activities falling within the purview of Schedule VII of the Companies Act, 2013 as amended from time to time and does not/shall not include the activities undertaken in pursuance of normal course of business of the Company.

The Projects, programs or activities proposed to be undertaken by the Company pursuant to the Policy are outlined in Annexure-I attached hereto.



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7. CSR COMMITTEE:

Since, as per Section 135 (9) of The Companies Act, 2013 the amount to be spent for CSR activities as provided in section 135 (5) does not exceed Fifty Lakh Rupees, hence there is no requirement for constitution of CSR Committee for now and the functions shall be discharged by the Board of Directors of company.

Role and Responsibilities of Board of Directors shall be;

- To formulate and recommend a CSR Policy indicating the activities to be undertaken by the company in areas or subject specified in Schedule VII to the Act;
- To recommend the amount of expenditure to be incurred on CSR activities;
- To formulate and recommend an annual action plan in pursuance of CSR Policy and recommend changes, if any, needed in annual action plan with reasonable justification to that effect;
- To monitor the CSR Policy from time to time;
- Approve projects that are in line with the CSR Policy and Review the progress of CSR projects and the utilization of budgets for such projects.
- Review and recommend the CSR report to be included in the board's report;
- Review and recommend any amendments to be made in the CSR policy of the Company;
- To carry such other functions as may be required relating to CSR activities of the company

8. IMPLIMENTATION:

- The time period for implementation of the programme will depend on its nature, extent of coverage and the intended impact of the programme.
- CSR Programs shall be implemented with active participation of the local community, wherever possible, and in consultation with the State Government for policy and strategic purposes and local administration at city, village, block and district levels for operational purposes, wherever applicable. These implementations will also be synergized with the initiatives undertaken by the State Government, District Administration, Local Administration as well as Central Government Departments.
- While all CSR programs will be focused in India, the Company shall give preference to the local areas.



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- While identifying long-term programmes, all possible efforts shall be made to define (a) Programme objectives (b) Baseline survey- It would give the basis on which the outcome of the programme would be measured (c) Implementation schedules - Timelines for milestones of the programme (d) Responsibilities and authorities (e) Major results expected and measurable outcome.
- The Board of Directors of the Company shall ensure that Company spends the requisite amounts specified under the Companies Act, 2013 on CSR activities failing which it shall specify in its report the reason for not spending the amount and further dealt with in the manner prescribed under the 2013 Act and the CSR Rules.
- The Board shall/may delegate necessary powers for execution and implementation of the CSR Policy. The delegation shall also include powers for meeting the requirements arising out of immediate & urgent situations.

9. MONITORING AND FEEDBACK:

- To ensure effective implementation of the CSR programmes, the Company shall put in place, suitable monitoring mechanism.
- The progress of CSR programmes under implementation will be reported to the Chairman of the Board on Half yearly basis.
- Board shall periodically monitor the progress of CSR projects, programs and activities incorporated in the CSR Policy and shall hold review meetings as and when required.
- The composition of the Board, CSR Policy and Projects approved by the Board will be displayed on the Company's corporate website.
- The Board Report of a Company shall include an Annual report on CSR containing the particulars as prescribed from time to time under the Act and under the Companies (Corporate Social responsibility Policy) Rules, 2014 shall form part of Annual Report of the Company.



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10. ADMINISTRATION AND REVIEW OF THE POLICY:

The Board shall be responsible for the administration, interpretation, application and review of the Policy. In case of any doubt with regard to any provision of the CSR Policy and also in respect of matters not covered herein, a reference should be made to the Board.

11. REVIEW AND AMENDMENT:

The policy may be reviewed by the Board on need basis. The Board may review the policy due to change in law as may be felt appropriate by the Board.

12. SUPERSEDING:

In case of any amendment, changes in the Act, SEBI (Listing Obligations and Disclosure Requirements), 2015 or any other law which makes it inconsistent with the provisions of this policy than the provisions of the Act or such other law shall prevail over the policy and the policy would be modified in the due course of time to make it consistent with law.

❧ END ❧

Encl.: Annexure-I



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Annexure-I: CSR Projects, Programs and activities

- Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the swatch Bharat Kosh set up by the central government for the promotion of sanitation and making available safe drinking water;
- Offering medical relief and spread and/or promotion and/or contribution to the cause of medical relief in its widest and most comprehensive sense including relief from and/or prevention of physical and/or mental illness or suffering and promotion of relief for physical and/or mental illness or suffering and promotion of physical and/or mental health in such manner and upon such terms and for such period in each case as the trustees may think fit.
- combating human immunodeficiency virus, acquired immune deficiency syndrome, malaria and other diseases;
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and differently abled and livelihood enhancement projects;
- 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;
- reducing child mortality and improving maternal health;
- 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);
- Protection and promotion of national 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;
- Measures for the benefit 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;



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- Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
- Contribution to the Prime minister's national relief fund 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;
- (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;
- (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).
- Slum area development
- rural development projects;
- social business projects;
- Disaster management, including relief, rehabilitation and reconstruction activities.
- Any other project as may be specified under Schedule VII of the Companies Act, 2013, from time to time.