

## ESL STEEL LIMITED

### CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

#### A. POLICY OBJECTIVE

ESL Steel Limited ('ESL' or 'the Company') is committed to conduct its business in a socially responsible, ethical, and environmentally friendly manner and to continuously work towards improving quality of life of the communities in its operational areas.

#### B. ESL CSR PHILOSOPHY

We at ESL have a well-established history and commitment to work with our partners, communities, and stakeholders.

We believe, that:

- In partnership with National Government, State Government, Civil Societies, Community Institutions, and other local, national, and international partners we can positively impact and contribute to realization of Sustainable development goals for India.
- sustainable development of our businesses is dependent on sustainable, long lasting, and mutually beneficial relationships with our stakeholders (Internal & External), especially the communities we work with.

#### C. POLICY DETAILS

We at ESL believe that the process followed in execution of CSR programs is equally important. Hence, we are committed to, though not limited to

##### a) Inclusive Development

- We recognize and understand that people are the best architects of their destiny. To encourage sustainable socio-economic development, people participation will be ensured in all processes and programs as the basic tenet of our CSR work.
- The CSR projects will be aligned based upon the recommendation of need assessment & baseline survey.
- The Annual Action plan shall be based on the project selected based on need assessment and baseline survey report.
- We focus on long-term community centric sustainable projects where we also ensure baseline, Socio-economic impact assessment to be done for greater impact in the society.
- We respect cultural ethnicity and dignity of individuals and foster positive relationships with the people in the project areas where the Company operates.
- We will aim to provide development opportunities to local communities in a culturally appropriate manner, in consultation & cooperation with primary beneficiaries, local government authorities and other stakeholders, as may be appropriate.

**b) Partner with Other Stakeholders and Development Players (Where Feasible)**

We would partner with other development players - governmental, non-governmental, other corporate organizations and community institutions to supplement and complement resources and programs already available or being executed.

**c) Corporate Social Responsibility Principles**

ESL's CSR Policy is supported by the following principles:

1. We are committed to conducting our operations with integrity and respect, in the interest of our stakeholders, and in line with our business ethics and code of conduct.
2. We believe growth and environmental sustainability need not be conflicting. Our business model is designed to deliver sustainable growth.

**d) CSR Committee of Directors at the board Level Comprises of:**

1. Mr. Thomas Mathew Thumpeparambil, Independent Director – Chairman
2. Ms. Poovannan Sumathi, non-executive Women Director - Member
3. Mr. Ashish Kumar Gupta, Whole Time Director & CEO - Member

Reappointment or reconstitution of CSR Committee will be done with the permission of the Board or as per the Company Act.

In accordance with Section 135(5) of the Companies Act, 2013 (the Act), ESL is committed to spend at least 2% of its average net profit (if any) made during the three immediately preceding financial year in some of the identified activities that are listed in schedule VII (as amended) to the Act.

**e) Governance Mechanism:**

We follow structured governance procedures to monitor CSR activities. Our CSR activities are governed by CSR ExCo Committee/Mancom to give directions to the projects and explore new opportunities.

**D. CSR THEMATIC FOCUS**

Our programs are aligned with SDGs and for the overall socio-economic growth and empowerment of community of our operational areas.

The major thrust areas will be –

1. Child Education & Well-being
2. Women Empowerment
3. Healthcare – Including preventive healthcare & sanitation.
4. Drinking Water & Sanitation

5. Agriculture & Animal Husbandry
  6. Community Infrastructure Development
  7. Skilling the Youth for New Opportunities
  8. Environment Protection & Restoration
  9. Sports & Culture
  10. Participate in National Importance Programmes including but not limited to disaster mitigation, rescue, relief, and rehabilitation.
- As a strategy we will partner with GOI, State Government and other National and International players for disaster response: relief and rehabilitation.
  - The list of CSR activities and implementation modalities may be modified from time to time, as per recommendations of the CSR Committee of the Company.
  - The surplus, if any, arising out of CSR initiatives of the Company shall not form part of its business profits.

## **E. IMPLEMENTATION STRATEGY OF CSR PROGRAMME**

ESL shall consider the following implementation model for delivering its CSR programme:

- Through forming partnerships with third parties such as Civil Society/NGOs, Academic and Training Institutions, Corporates, the Government, and community groups.
- In-House implementation by Vedanta - including design and delivery of the project.

## **F. MONITORING MECHANISM**

Regular monitoring of all CSR initiatives would be undertaken, which will include:

- Internal reviews by CSR teams
- Periodic third-party assessment of key programs
- Baseline and impact assessment with key indicators in our areas of operation every three years through an independent agency.
- Review by the CSR Committee shall be done twice a year on annual plan/budget, expenditure, activities undertaken, progress of the project.

## **G. AUDIT**

All CSR activities and expenses shall be audited by an appointed auditor.

## **H. COMMUNICATION**

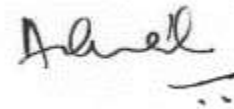
ESL should voluntarily communicate the results of its social programs to relevant stakeholders on a periodic basis.

## **I. RESPONSIBILITY**

The responsibility for compliance with this policy lies with the CSR Committee, the Directors, Chief Executive Officer, Senior Managers and all employees and consultants working for ESL.

## **J. REVIEW OF POLICY**

The CSR Policy will be reviewed every three years or as may be recommended by the CSR Committee of the Company.



**Date of Approval: 20<sup>th</sup> January 2024**

**Mr. Ashish Gupta**  
**CEO & Whole Time Director**