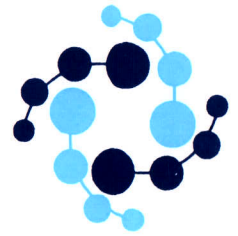


# Steelman Telecom Limited

(Formerly known as Steelman Telecom Private Limited)



## “CSR” Policy of Steelman Telecom Limited

### 1. CSR Policy

“CSR Policy” means a statement containing the approach and direction given by the Board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

### 2. Steelman Telecom’s Corporate Social Responsibility Objectives

#### Steelman Telecom CSR Policy intends to:

- Strive for economic development that positively impacts society at large with minimal resource footprint.
- Embrace responsibility for the Company’s actions and encourage a positive impact through its activities to alleviate hunger, poverty, and malnutrition; to protect the environment; and to support communities, stakeholders and society.

#### Approach and Direction

The Board of Directors of the Company is committed to assist the underprivileged, deprived and needy sections of society and to help them in building a sustainable way of living.

#### Areas of CSR Initiative

The following areas shall be covered under the Company’s CSR Initiative in accordance with Schedule VII of the Companies Act, 2013 as has been clarified in the General Circular No.21/2014 dated 18 June, 2014 and subsequent Circular / notifications issued by Govt. of India time to time:-

- Promoting Health care: 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. Funds may be spent for various activities related to Covid-19 as well.
- Promoting education, including special education and employment enhancing vocational skills especially among children, women, the elderly, and the differently-abled, and livelihood enhancement projects.



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- iii) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers 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.
- v) Protection 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.
- vi) Measures for benefit of armed forced veterans, war widows and their dependents.
- vii) Training to promote rural sports, Paralympics and Olympic Sports.
- viii) Contribution to the Prime Minister's National Relief 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.
- ix) Contribution to incubators or research and development projects in the field of science, technology, engineering, and medicine, funded by the Central agency of the Central Government or State Government; and,

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, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization (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.



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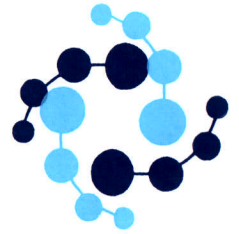
Website : [www.steelmantelecom.com](http://www.steelmantelecom.com) | Email : [contact@steelmantelecom.in](mailto:contact@steelmantelecom.in)

Phone No. +91 84430 22233 | CIN No. U55101WB2003PLC096195



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- xi) Slum area development. Slum area shall mean any area declared as Slum by Central Govt. or any State Govt. or any other competent Authority under any law.
- xii) Disaster Management including relief, rehabilitation and reconstruction activities.

### 3. Location of projects

Preference would be given to projects located in and around where Steelman Telecom has a business presence for ease of control and monitoring. However, the company may identify other areas if deemed fit, which CSR Committee may recommend to the Board for approval.

### 4. Guiding principles for conducting CSR activities.

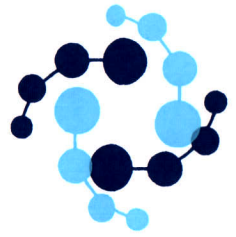
Guiding principles of Selection process

- a. Proposals to select under different heads of activities shall be in accordance with Schedule VII of the Companies Act 2013 and amendments to it from time to time, and to ensure that it fulfils the eligible criteria defined in the company's CSR Policy.
- b. Visit by CSR department's Officials at the site, preparation of report and its submission to the CSR Committee with all related documents for approval.
- c. The activities which benefit the underprivileged and the downtrodden will be given preference.
- d. The activities identified by the Company are to be carried out by entities with a proven track record, to be eligible for funding by the Company.
- e. Generally, a CSR activity which is proposed to be completed during a financial year shall be preferred. However, if an "ongoing project" is selected, funding shall be done in each year during the duration of the project out of the funds earmarked for each Financial Year.
- f. "Ongoing Project" means a multi-year project undertaken by the company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced. However, they may include projects that were initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board, based on reasonable j
- g. Select projects which are monitorable with the fund disbursed and activities performed in accordance with predetermined milestones.
- h. Maximum priority shall be given to projects where benefits to participants are clear and measurable.



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## 5. Guiding Principles of Implementation and Monitoring process

- a. CSR projects/proposals as approved by the Board shall be carried out either directly by the Company or through entities who are registered with the Registrar of Companies and have been allotted a Unique Registration Number permitting them to carry out CSR activities, in conformity with the prescribed Rules.
- b. Every CSR project shall have a time frame and periodic milestones shall be finalized before selection.
- c. All connected and related formalities shall be followed as per relevant Rules and the Act in processing and implementing CSR project.
- d. Monitoring of CSR activities shall include visit and inspection by officials of Company's CSR team, periodic reports on progress on implementation of a project, etc. However, the methodology of monitoring shall be determined by the CSR Committee on the recommendation of Company's CSR team, depending upon the nature of the CSR activity and the manner and scope of implementation.
- e. Funds allocated for the CSR project shall be disbursed depending on the nature of the project. Where the amount to be allocated is in tranches, such disbursement shall be made on the basis of the schedule, progress of the project and utilization of the amount already disbursed. For this purpose, the CSR team shall carry out inspection and shall prepare and submit monitoring report for approval and release of subsequent payment.
- f. Wherever any CSR activity is implemented through an approved Agency, besides inspection by CSR team on the progress made, suitable certificates from such agency shall be obtained on utilization of the funds provided by the Company and reports on the progress/status of implementation and/or completion of the project, as the case may be, be obtained.
- g. Status Report on the progress of CSR project undertaken shall be reported to CSR Committee by the CSR team at every meeting of the CSR Committee.



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- h. As and when considered appropriate, services/ assistance of Group/ Associate Companies located near the project site for CSR related activities may be availed of. In such cases, the CSR team shall also ensure that it receives a report on the progress of implementation of each of the project and actual use of funds periodically for release of payment, if any.
- i. In case of an ongoing project, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be entitled to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

## 6. Formulation of Annual Action Plan

- a. The Company shall prepare Action Plan at the beginning of every Financial Year stating the amount it is required to spend in that Financial Year which currently should not be less than 2% of the average net profit of the Company made during the three immediately preceding financial year as per relevant provision / Act.
- b. The action plan shall also include tentative allocation of funds for the Financial Year under different heads of activities with full flexibility in allotment of funds in different activities as per CSR Policy of the Company, Schedule VII and other relevant provisions of the Companies Act, 2013.
- c. The above Action Plan shall be placed before the CSR Committee and, on its recommendation, to the Board of Directors of the Company for approval.
- d. Company's CSR Team will identify / verify on project / activities and may seek proposal for CSR activities from various entities who are registered under the Act of parliament or State Legislature as specified in Rule 4 of Act and have taken unique Registered number as per new Amendments.
- e. Annual action plan in pursuance of policy shall include tentative list of CSR project, Subjects specified under Schedule VII, Project cost, manner of execution, modalities of fund utilization, implementation schedule, monitoring & details of need & Impact Assessment if any.
- f. The action plan may be altered by the Board with the recommendations of CSR Committee as and when necessary.

## 7. Unspent amounts of CSR

- i) Efforts will be made to spend the amount earmarked for CSR activities within the financial year itself.



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- ii) Until a fund is specified in Schedule VII for the purpose of subsection (5) and (6) of Section 155 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in Schedule VII of the Act.

## 8. Surplus arising out of CSR activities.

- a) In the event of any surplus that may arise out of the CSR projects or programmes or activities funded or implemented by the Company, such surplus or any surplus shall not form part of the business profit of the Company. It will either be ploughed back into the same project or transferred to the unspent CSR amount and spent in pursuance of CSR policy and annual Action plan of the Company or be transferred to the fund specified in Schedule VII within a period of 6 months.
- b) In case the Company spends more than required amount on CSR during FY, that excess amount can be "set off" against the required amount for CSR expenditure for the succeeding 3 years subject to Board approval by resolution.

## 9. CFO Certification

The CFO shall certify at the Board meeting that fund disbursed by the Company has been utilized properly for the purpose and in the manner as approved by CSR Committee / Board. The CFO for such purpose may engage an Internal Auditor to carry out such exercise.

## 10. Review Mechanism

- a. CSR Committee of Directors shall review report on selection, implementation and monitoring of activities as well as formulation of the action plan at regular intervals. The CSR Team will maintain all the relevant documents and papers for submission to the Committee of Directors for the said purpose.
- b. The Minutes of the Committee of every meeting shall be placed to the Board of Directors for its consideration and approval.

## 11. Website of the Company

The Company shall disclose all relevant and needed issues / subject in the website as per Act for public access, including Composition of Committee, policy project approved etc.

## 12. Amendment to the Policy

The Board of Directors on its own / or on the recommendation of CSR Committee can amend its policy as and when required due to revision / amendment issued from time to time from the relevant authorities.





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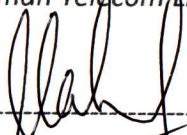


## 13. Took note the (Corporate Social Responsibility Policy) Amendment Rules, 2021

The Committee discussed the various changes in law for compliance as per (Corporate Social Responsibility Policy) Amendment Rules, 2021 such as compulsory Registration of entity carrying out the CSR activities with Ministry of Corporate Affairs by filing Form-CSR-1, Minimum track record of more than three years in carrying out CSR activities, restriction for administrative expense to be below 5% of total CSR expense, Provision of carry forward of excess expense incurred on CSR for set-off against CSR spending of next three years subject to passing of resolution by Board to that effect, Capital expenditure by the company for creation of capital asset in favour of eligible entity being trust or Section- 8 company or self-help groups or public authority, registered charitable trust beneficiary etc.

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By The Order of the Board  
For Steelman Telecom Limited

  
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Mahendra Bindal  
(Managing Director)  
DIN: 00484964



Board adopted CSR Policy  
as on date 14.11.2023