JAYTEE ALLOYS & COMPONENTS LIMITED

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CORPORATE SOCIAL RESPONSIBILITY POLICY

Document Summary

Version Number	Version 1.0
Approved by	Board of Directors
Revision	Any revisions or modifications to this policy to be Reviewed by the Chief Compliance Officer/Company Secretary and submitted to the Board for approval.

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Introduction:

The new Companies Act 2013 (hereinafter referred to as 'the Act'), has introduced the idea of Corporate Social Responsibility ("CSR") to the forefront and through its "Comply-or-Explain" mandate. It mandates qualifying companies to constitute Corporate Social Responsibility Committee to effectively monitor CSR activities of the Company. Further the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as "CSR Rules") lays down the framework and modalities of carrying out CSR activities which are specified in Schedule VII of the Act.

2.

A socially responsible organisation cannot, and does not, limit itself to merely increasing its own profits. Neither does it treat corporate social responsibility as a burden to be borne, but instead, believes it to be one of the fundamental duties of an organisation towards society. CSR is a way of conducting business, by which a corporate entity visibly contributes to the social good.

At JAYTEE ALLOYS & COMPONENTS LIMITED, we are constantly aware of our role in society, as that of a mentor and a builder of the lives of the children of our society, and therefore, its future. Hence, as a corporate entity, we at IMS strive at every stage to integrate the larger economic, environmental and social objectives with our core operations and growth. We endeavour to evolve our relationship with all our stakeholders for the common good, and validate our commitment in this regard by adopting appropriate business processes and strategies.

The provisions related to CSR are incorporated under Section 135 of Companies Act, 2013 (the Act) read with Schedule VII to the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the Rules) and further amendments thereto along with General Circular No. 21/2014 w.r.t. Clarification with regard to provisions of Corporate Social Responsibility under section 135 of the Companies Act, 2013. The Ministry of Corporate Affairs (MCA) has, vide its Notification dated 27th February 2014, implemented provisions related to CSR which will be effective from 1st April, 2014.

3. Definitions:

In this Policy unless the context otherwise requires:

3.1 'Act' means Companies Act, 2013, including any modifications, amendments or Re-enactment thereof.

3.2 'Corporate Social Responsibility' (CSR) means and include but not limited to the activities as specified in this policy, but contribution directly or indirectly to the political party, business done by the Company in its normal course, activities only for the benefit of employees and activities done outside India will not be considered as CSR activity;

3.3 'Net profit' means net profit as defined in Section 135 of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014 as set out below:

Net profit as per financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following namely: -

I. Any profit arising from any overseas branch or branches of the Company, whether operated as a separate Company or otherwise; and

II. Any dividend received from other companies in India which are covered under and complying with the provisions of section 135 of the Act.

3.4 Words and expressions used in this CSR Policy and not defined herein but defined in The Act shall have the meaning respectively assigned to them in the Act.

4. CSR Activities:

The policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged by one or more of the following focus areas as notified under Section 135 of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014:

4.1 Eradicating hunger, poverty and malnutrition, promoting health care including preventive 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;

4.2 Promoting education, including special education and employment enhancing vocation skills specially among children, women, elderly, and differently abled and livelihood enhancement projects;

4.3 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;

4.4 Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, 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);

4.5 Protection of national heritage, art and culture including restoration of building and sites of historical importance and works of art: setting up public libraries; promotion and development of traditional arts and handicrafts:

4.6 Measures for the benefit of armed forces veterans, war widows and their dependents;

4.7 Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;

4.8 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 Schedule Castes, the scheduled tribes, other backward classes, minorities and women;

4.9 Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

4.10 Rural development projects;

4.11 Slum area development.

5. Contribution for CSR Activities:

5.1 The Board of the Company shall ensure that the Company spends, in every financial year, at least two per cent of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of the Policy;

5.2 If the Company fails to spend such amount the Board shall, in its report specify the reasons for not spending the amount;

5.3 The surplus arising out of the CSR projects or programs or activities shall not form Part of the business profit of a company and shall be carried forward for spending in the next financial year;

5.4 The contribution in CSR Activities shall only be made in India;

Explanation: if any contribution in CSR Activities is made outside India, the same shall not be considered in calculation of two percent limit as specified in clause (5.1) above;

5.5 The Company shall give preference to the local area and areas around it where it operates for spending the amount earmarked CSR activities.

6. CSR Committee:

Constitution of CSR Committee:

The CSR Committee shall consist of two or more Directors, as may be deemed fit by the Board. The Committee shall meet, whenever required, to discuss and review CSR activities and Policy. Quorum for the CSR Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.

The Committee members may attend the meeting physically or via such audio visual means as permitted under the Act. The Committee shall have the authority to invite such employee(s), senior official(s) and or externals experts, as it may deem fit, to attend the CSR Committee Meeting(s). The Company Secretary, if any, shall act as Secretary to the Committee.

Scope & Functions of CSR Committee:

The functions / terms of reference of CSR Committee shall, inter-alia, include the following:

a. To formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken by the Company as per the Act;
b. To recommend CSR activity / programme / project to the Board for its approval;
c. To review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the Company;
d. To monitor the CSR Policy of the Company from time to time;
e. To review the CSR activities of the Company and provide progress update to the Board of Directors at such interval as may be deemed fit.
f. Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors, from time to time.

CSR ACTIVITIES / PROGRAMMES / PROJECTS:

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of under privileged section of the society by one or more of the focus areas as outlined in Annexure-I to this Policy.

The CSR Committee shall consider and approve (in line with the guidelines given below), CSR activities / programmes / projects to be undertaken during the year.

a. To ensure that the CSR activity / programmes / project is not discriminatory in nature;
b. The CSR activities be implemented within India and preferably in the areas where the Company has its presence;
c. Programmes / projects that integrate business models with social and environmental priorities and process in order to create shared value shall be encouraged;
d. CSR activity/ programme /project should not exclusively for the benefit of employees of the Company or their family members or those that are conducted /undertaken exclusively in pursuance to the normal course of business of the Company;
e. Any surplus generated from CSR activity of the Company, will be plough back to the CSR initiavities of the Company.

This Policy will serve as guiding document to help identify, execute and monitor CSR projects in keeping with the spirit of the Policy.

Implementation:

The Company shall undertake CSR Projects which are closely linked with the principles of sustainable development and shared value, with involvement of local institutions and the community at large.

The CSR Core Team would assist in implementation and monitoring of the CSR projects / initiatives. The actual implementation of various initiatives would be broad-based with the involvement of various employees/units or through implementing agencies like NGOs, Trusts, Societies, Section 8 / Section 25 companies or through collaborative projects with other corporate.

Disbursement:

The disbursement of funds for CSR activity / programme / project will be in one or more tranche depending upon the nature and requirement of project. The terms, conditions and timing of disbursement will be with the approval of CSR Committee after due discussion with the CSR Core Team.

AMENDMENTS / MODIFICATION TO THE POLICY:

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this Policy, as and when required or deemed fit. The provisions of this CSR Policy would be subject to revision/amendment in accordance with the provisions of the Act, as may be issued from relevant statutory authorities, from time to time.

Amendment

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

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JAYTEE ALLOYS & COMPONENTS LTD.

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Footnote

1. The Board of Directors at its meeting held on 01-09-2026 has adopted this Policy first time.