

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Preface

Brahmani River Pellets Limited is engaged in the business of Manufacturing and Selling of Iron Ore Pellets within and outside India. The company is having Beneficiation plant, strategically located in Iron Ore mine area at Barbil in Keonjhar district and Pellet Plant at Kalinganagar in Jajpur district of Odisha. Beneficiation plant and pellet plant are connected with state of art Slurry Pipe line which run through 230 kms.

The Company is committed to creating more smiles at every step of the journey and is in constant pursuit of making life better for communities with its various initiatives in the fields of health, education, livelihood and sports along with art and culture.

The Company believes in inclusive growth to facilitate creation of a value-based and empowered society through continuous and purposeful engagement of society around.

*The Company firmly believes in strengthening the social capital. It has adopted a **Corporate Social Responsibility Policy** where it strives to address the social issues in and around its plants.*

Brahmani River Pellets Limited (BRPL) is committed to:

- ***Allocate at least 2% of its average Net Profits made during the three immediately preceding financial years towards Corporate Social Responsibility, as per the categories mentioned in Schedule VII of the Companies Act 2013,***
- ***Transparent and accountable system for social development and conducting periodic assessments,***
- ***Concentrate on community needs and perceptions through social processes***

and related infrastructure development,

- ***Provide special thrust towards empowerment of women through a process of social inclusion,***
- ***Spread the culture of volunteerism through the process of social engagement.***

FOCUS:

BRPL has decided to focus on the complete life cycle approach with specific interventions are recommended as below:

- Efficient maternal and child health care services
- Enhance access to improved nutrition services
- Access to safe drinking water at remote areas
- Early childhood education/ pre-primary education
- Completion of primary and secondary education
- Enhancing the output of present occupation
- Skill Development, Employability and vocational education
- Support various CSR initiatives as per guidelines of IMCO, Govt of Odisha.

STRATEGY:

BRPL allocates at least 2% of its average Net Profits made during the three immediately preceding financial years for the planning and implementation of CSR. All the CSR initiatives are approved by the committee and the same are reviewed periodically.

Taking a note of the importance of synergy and interdependence at various levels, BRPL would adopt a strategy for working directly or in partnership, wherever appropriate.

- Priority to be given to the areas in the immediate vicinity of the plant locations defined as Direct Influence Zone (DIZ). The policy enables plants to define their own DIZ with the provision that this could be expanded as per the size of operations. However, certain programs might be expanded beyond this geographical purview and upscaled. This context is defined as Indirect Influence Zone (IIZ)
- All the interventions would be formulated based on need assessment using different quantitative and qualitative methods
- All the interventions would be adopted based on concurrent evaluation and knowledge management through process documentation
- Social Mobilization, advocacy at various levels, and/or appropriate policy changes would form part of the interventions in each sector

INTERVENTIONS:

In line with the approach and strategy, BRPL plans interventions in the field of health, education, livelihood, skill development, vocational education, women empowerment, environment sustainability and responsible citizenship. The key thematic interventions as per the Schedule VII of the Companies Act 2013 include:

1. ERADICATING HUNGER, POVERTY, MALNUTRITION, ETC.:

BRPL as per its commitment to the local development and nation building shall initiate various projects. Major projects planned under this theme over next three years include:

- a. Soil and water conservation
- b. Provision of Safe drinking water in remote areas.

- c. Complimenting government schemes such as ICDS- *Integrated Child Development Scheme* and NRHM – *National Rural Health Mission (ANC, PNC, Immunization)*
- d. Entitlements- *Facilitating access to government schemes*
- e. Linkages with the existing government schemes/ programs such as MNRAREGA,

PURA Model - Providing Urban Amenities in Rural Area model
- f. Screening for disease such as TB, cancer, hypothyroidism, bone density, etc.
- g. Improvement of the infrastructure of Primary Health Centre
- h. Awareness generation at the community level
- i. Preventive measure to reduce the incidences of disease.

2. PROMOTING EDUCATION, SKILL DEVELOPMENT, LIVELIHOOD ENHANCEMENT ETC:

Education is the basis for improving the quality of life of people. Taking a note of this, BRPL both independently and in partnership with local government and civil societies wants to undertake various programs. Along with this, enhancing the productivity of available workforce through engaging the youth with appropriate employability skills and assuring sustainable livelihoods continues as one of the top priority. The activities planned under this theme include:

- a. Improving the infrastructure of local schools
- b. Financial Support to Gram Panchayat Schools for Teachers
- c. Transportation facility for School Children
- d. Training of teachers
- e. Complimenting Mid-day meal program

- f. Remedial classes for children with slow learning
- g. Life skill education, leadership and motivation of children
- h. Support for adult / children with different abilities
- i. Create opportunities for access to higher education

3. PROMOTING GENDER EQUALITY, WOMEN EMPOWERMENT, ETC:

Women are the primary focus for development of the communities and the nation. BRPL strongly believes in this philosophy. Major projects planned to substantiate this include:

- a. Skill building (vocational skills and employment)
- b. Economic empowerment (SHGs and entrepreneurship)
- c. Facilitating linkages for destitute and widow

4. ENSURING ENVIRONMENTAL SUSTAINABILITY:

Nurturing the nature and adopting processes to enhance its sustainability remains a major goal of the BRPL. As vigilant and responsible corporate, the major interventions include:

- a. Solid waste management
- b. Sanitation and personal hygiene
- c. Afforestation
- d. Rainwater harvesting
- e. Harnessing science and technology
- f. Fostering Local innovations

5. PROMOTION OF RURAL SPORTS / TRAINING:

Sports training / Competition facilitation for following nationally recognized sports for promoting and strengthening the sports in India:

- a. Football
- b. Volleyball
- c. Cricket
- d. Kabaddi

6. RURAL DEVELOPMENT PROJECTS:

Infrastructure development in rural area including road, toilets, lighting, community centre, etc.

IMPLEMENTATION:

A. Implementing Agency:

The CSR activities would be implemented by:

- a. BRPL when the activities are related to civil works involving construction of buildings, roads, and other infrastructure related projects, direct financial support etc.
- b. Recognized NGO or in participation with Government, Foundations or any other institution with relevant expertise and experience in the sector

B. Annual plan would be prepared with clear quarterly milestones.

C. The surplus arising out of the CSR projects or programs or activities shall not form part of the business profits of the Company.

Corporate Social Responsibility (CSR) Committee:

- o The Board constituted CSR Committee, along with the CSR team, shall be responsible for the decision making with respect to the Company's CSR policy.
- o CSR Committee shall recommend the CSR policy to the Board of the Company, and Board of Directors shall approve the Company's CSR policy.
- o The CSR Committee shall formulate and recommend to the Board, an annual

action plan consisting of the following:

- a. The list of CSR programs that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - b. The manner of execution of such programs;
 - c. The modalities of utilization of funds and implementation schedules for the programs;
 - d. Monitoring and reporting mechanism for the programs; &
 - e. Details of need and impact assessment, if any, for the programs undertaken by the Company Provided that Board may alter the Annual Action plan at any time during the financial year, as per the recommendation of its CSR Committee.
- o The CSR Committee shall meet regularly to review the implementation of CSR programs/ programs and give suitable direction

In case of an ongoing program, the Board of the Company shall monitor the implementation of the program with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the program within the overall permissible time period. "Ongoing Program" here means a multi-year program 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, and shall include such program that was initially not approved as a multi-year program but whose duration has been extended beyond one year by the board based on reasonable justification.

Treatment with respect to unspent CSR amount

- a. If the Company fails to spend prescribed CSR amount, the Board shall, in its report specify the reasons for not spending the amount unless the unspent amount relates to any ongoing project and transfer such unspent amount to a Fund specified

in Schedule VII, within a period of six months of the expiry of the financial year.

- b. Any prescribed CSR amount remaining unspent pursuant to any ongoing project, undertaken by a Company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the Company within a period of thirty days from the end of the financial year to a special account to be opened by the Company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the Company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the Company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.
