

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. SHORT TITLE & APPLICABILITY

Berry Alloys Limited (“BERRY”, The Company) with this CSR policy encompasses the company’s philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for carrying out socially useful activities/ projects and programs for welfare & sustainability and development of community at large, preferably at local area and in its areas of operation, it is titled as “BERRY CSR Policy”.

This policy shall apply to all CSR projects, activities and initiatives taken-up at all units/ Registered office/ Regional/ District offices/Work Centers, or any other location as may be decided by the management of BERRY for the benefit of different segments of the society.

2. VISION STATEMENT & OBJECTIVES

VISION

“To commit for enhanced value-creation for the Society, our shareholders, other stakeholders and the communities by taking-up activities and initiatives for sustainable growth for the Society, with environmental concern”.

OBJECTIVES

“To ensure an increased commitment at all levels in the organization, operate its business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders”.

To directly or indirectly take up programs that benefits the communities in & around its units/ Registered office/ Regional/ District offices/Work Centers and results, over a period of time, in enhancing the quality of life & economic well-being of the local population.

3. CSR COMMITTEES

BERRY shall have a CSR Committee of Board consisting of three or more directors out of which at least one Director shall be an Independent Director.

For carrying out the CSR Projects / Activities, the Committees will meet as per the following schedules: Atleast once in every financial year.

4. AREAS OF CSR ACTIVITIES

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the



- Central Government for the promotion of sanitation and making available safe drinking water;
- ii. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly & the differently abled and livelihood enhancement projects;
 - 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 & 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 & culture including restoration of buildings, sites of historical importance and works of art; setting-up public libraries, promotion and development of traditional arts and handicrafts.;
 - vi. Measures for the benefit of the 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;
 - vii. Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports;
 - viii. 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 Caste, Scheduled Tribes, other backward classes, minorities and women;
 - ix. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Biotechnology (DBT), Department of Science and Technology(DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);
 - x. Rural development projects ;
 - xi. Slum area development;



Explanation.- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

- xii. Disaster management, including relief, rehabilitation and reconstruction activities.

5. FUNDING & ALLOCATION

1. For achieving CSR objectives, BERRY will allocate 2% of the average net profits of the Company made during the three immediately preceding financial years, as its annual budget for the current year.
2. The annual budget allocated on a yearly basis will be utilized to carryout activities / projects relating to the CSR Areas as per the CSR Plan for the year.
3. If the Company fails to spend the allocated CSR amount, the Board shall in its report made under clause(o) of sub- section(3) of section 134 of Companies Act, 2013, specify the reasons for not spending the amount.

6. IMPLEMENTATION

1. CSR programs will be undertaken by Corporate Office/ Registered offices/ Regional Offices/ District offices/ Work Centers of BERRY to the best possible extent within the defined ambit of the above identified heads.
2. The time period/duration over which a particular program will spread, will depend on its nature, extent of coverage and the intended impact of the program.
3. Programs which involve considerable financial commitment and are undertaken on a time frame of 2-5 years, will be considered as 'flagship programs' and accorded enhanced significance.
4. By and large, preference will be given for the CSR programs to be executed in and around the areas adjoining BERRY Registered office /Divisions/ Regional / District offices/ Work Centers, including Corporate Office.
5. Whenever possible, initiatives of State Governments, District Administration, Local Administration as well as Central Government Departments Agencies, Self-Help Groups, etc., would be dovetailed and synergized with the initiatives of by BERRY.
6. Project activities identified under CSR are to be implemented by specialized agencies, which could include - Voluntary Organizations (VOs) formal or informal local bodies such as Panchayats, Institutes/Academic Institutions, Trusts, Self Help Groups, Govt/ Semi Govt./Autonomous organizations, Mahila Mandals, Professional Consultancy organization or through any other means as may be decided by the management of BERRY.
7. The process for implementation of CSR programs will involve the following steps:
 - 7.1 Identification of programs by means of any of the following:
 - i. Need identification studies by professional institutions/agencies
 - ii. Internal need assessment by cross-functional team at the local level
 - iii. Receipt of proposals /requests from District Administration/local Govt. etc.



iv. Discussions and request with local representatives/Civic bodies / Citizen's forums / Voluntary Organizations.

v. Proposals as identified by the company in any other manner.

7.2. Project based approach:

BERRY Registered office / Divisions/ Regional/ district offices/ work centers will follow a project based accountability approach to stress on the long term sustainability of CSR projects, where its action plan will be distinguished as:

Short Term: up to 1 year

Middle Term: 1 year to 2 years

Long Term: 2 years and above

7. EXECUTING AGENCY/PARTNERS

BERRY will seek to identify suitable programs for implementation in line with the CSR objectives of the Company and benefit the stakeholders and the community for which those programs are intended. These works could be done through:

- Registered Trust / Registered Society.
- Company established by the Company or its holding or Subsidiary or associate Company under Section 8 of Company's Act.
- Collaboration with CPSEs / Companies.
- Community based organizations whether formal or informal.
- Elected local bodies such as Panchayats.
- Voluntary Agencies (NGOs).
- Institutes/ Academic Organizations.
- Trusts, Missions.
- Self-help Groups.
- Government, Semi-Government and autonomous.
- Organizations Standing Conference of Public Enterprises (SCOPE).
- Mahila Mandals/ Samitis.
- Contracted agencies for civil works.
- Professional Consultancy Organizations.
- Others.

8. MONITORING & FEEDBACK

To ensure effective implementation of the CSR programs undertaken at each Division / Office a monitoring mechanism may be put in place.

The progress of CSR programs under implementation will be reported to Corporate Office/ Registered office on annual basis. The CSR committee may conduct impact assessment studies



on a periodic basis, if necessary through independent professional third parties/professional institutions, especially on the strategic and high value programs.

BERRY's Registered office / Divisions /Regional /District Offices/Work Centers will also obtain feedback from beneficiaries about the programs. Appropriate documentation of the BERRY CSR Policy, annual CSR activities, executing partners and expenditure entailed will be undertaken on a regular basis and the same will be made available to Corporate Office/ Registered office.

CSR Policy and initiatives of the Company will also be reported in the Annual Report and in the official website of the Company.

9. ROLES & RESPONSIBILITIES

Each Berry Alloys Limited employee has a responsibility to abide by the fundamental principles outlined in this document, specific responsibility for implementation of the CSR Policy.

The CSR Board Committee shall:

- i. Formulate and recommend CSR Policy of the Company to the Board.
- ii. Recommend the amount of expenditure to be incurred on the CSR activities
- iii. Monitor the CSR Policy of the Company.
- iv. Allocation of budgets for each Division
- v. Finalizing and recommending projects each year for the approval of the Management and Board
- vi. Monitoring implementation & progress of the projects undertaken during the year
- vii. Reviewing of the projects undertaken for the year and the new projects proposed during the course of the year.

