



**Advance Steel Tubes Ltd.**

CIN : L24231UP1978PLC004583

AN ISO 9001 : 2000 Company

Manufacturers of : 'ERW' M.S. Black & Galvanised Pipes,  
Steel Tubular Poles, Steel Structures, Metal Crash Barrier & Scaffoldings



Sales Office : 81, FUNCTIONAL INDUSTRIAL ESTATE, PATPARGANJ, DELHI-110092

Phones : 011-43041400 (100 Lines) Fax : 91-11-22145978

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## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

### **SHORT TITLE**

This policy in relation to the Corporate Social Responsibility ("CSR") of Advance Steel Tubes Limited ("ASTL") is titled as the "CSR Policy" and shall include any alterations, amendments or modifications hereto from time to time.

### **VISION STATEMENT, OBJECTIVE AND APPLICABILITY**

- ASTL has a vision to "Enhance Stakeholder value while adhering to the code of 'Responsible Care' and ethical values".
- To actualize this vision, ASTL has set the following mission before itself through innovations, constantly endeavor to bring better products and processes that create greater value for the society and thereby ensuring:-
  - Effective contribution to the society
  - Value addition to the Stakeholders
  - Growth and Development of its employees
- This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act, 2013 ("Act") and the rules issued thereunder.
- The CSR policy aims to achieve following Objectives:
  - Enhance the quality of life of the people in areas surrounding the plant and offices;
  - Create a positive impact by making sustainable developments in the society and promote good environmental practices;
  - Be responsible and responsive corporate citizen through endeavors to create a safe, harmonious and ecologically balanced environment for its members and the community at large.
  - Maintain commitment to quality, health and safety in every aspect of the business and people;
- Further, ASTL endeavors to ensure increased commitment at all levels in the organization, to operate its business in an economically, socially and environmentally sustainable manner, while recognizing the interest of all its stakeholders.

### **SCOPE**

The CSR Policy applies to the formulation, execution, monitoring, evaluation, and documentation of CSR activities in the target locations, in and around Company's offices and



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Units.

## DEFINITION AND INTERPRETATION

- “Average Net Profit” shall have the same meaning as prescribed in Section 135 of the Act read with the Rules.
- “**Board**” means the Board of Directors of the Company.
- “**Company**” means Advance Steel Tubes Limited.
- “**CSR Activities**” means the projects or programs or activities undertaken / to be undertaken by ASTL as prescribed in Schedule-I of this policy.
- “**CSR Committee**” means a Committee constituted by the Board in terms of Section 135 of the Act and the CSR Rules.
- “**CSR Rules**” means the Companies (Corporate Social Responsibility Policy) Rules, 2014, as may be amended from time to time.
- “**CSR Expenditure**” means the amount recommended by the CSR Committee to be incurred on the CSR Activities in India in terms of the Act and the CSR Rules as approved by the Board from time to time.
- “**Director**” means a member of the Board of the Company.
- “**Society**” means a society registered under the Societies Registration Act, 1860 or any other applicable law in India.
- “**Trust**” means a trust registered under the Indian Trusts Act, 1882 or any other applicable law in India.

Any term not defined above, shall have the meaning assigned to it under the Act or the CSR Rules.

## CSR COMMITTEE

- The CSR Committee shall be responsible for providing recommendations to the Board with



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respect to CSR Activities that may be undertaken by the Company in accordance with the CSR Policy as well as the Act and the CSR Rules.

- The CSR Committee shall consist of at least three or more directors out of which at least one director shall be an independent director.
- Committees shall meet as often as necessary subject to the minimum number and frequency stipulated by the Board or as prescribed by any law or authority, time to time.
- The meetings shall be held at the registered office or at any other place as may be agreed by the members of the Committee.
- The number of members of the CSR Committee and their powers and functions can be specified, varied, altered or modified from time to time by the Board, subject to the provisions of the applicable law.

## CSR ACTIVITIES

- The Board shall ensure that the CSR Activities that are undertaken by the Company should be within the scope of the following activities:
  - 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.
  - Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
  - Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
  - 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.
  - 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 art and handicrafts;
  - Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their



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dependents including widows;

- Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
  - 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 govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
  - Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any 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, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (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).
  - Rural development projects
  - Slum area development. (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.)
  - Disaster Management, including relief, rehabilitation and reconstruction activities.
  - Any other project as may be specified under Schedule VII of the Act, or the CSR Rules or any circular from time to time.
- The CSR Activities will be carried out in a manner that the preference is to undertake the CSR Activities in and around the local areas where the Company operates.
  - Based on the scope of activities set out in above, the CSR Committee shall provide recommendations to the Board with respect to specific CSR Activities that may be undertaken by the Company.
  - The following details of any CSR Activities to be undertaken by the Company shall be presented to the Board by the CSR Committee along with its recommendations:



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- The objectives and expected results of the CSR Activity;
  - The relevant sector and the nature of the CSR Activity;
  - The focus area/ location for implementation of the CSR Activity;
  - The amount to be allocated towards the CSR Activity;
  - The indicative timelines for completion of the CSR Activity;
  - Whether the CSR Activity should be undertaken by the Implementation Group or any Implementing Agency or in collaboration with any other company; and
  - Such other details as it may deem necessary.
- In case any of the CSR Activities to be undertaken are anticipated to be long term, then a detailed estimate on implementation schedule or milestones should be submitted by the CSR Committee to the Board.
  - Based on the recommendations of the CSR Committee, the Board shall approve the following:
    - The specific CSR Activities that should be undertaken by the Company from time to time;
    - The amount that should be deployed towards such CSR Activity;
    - Whether the CSR Activities will be undertaken directly by the Company or through an Implementing Agency or in collaboration with any other companies and record reasons for the same.

## IMPLEMENTATION OF THE CSR POLICY

- The Board shall be responsible for implementing the mandate of the CSR Policy and shall ensure that the CSR Activities are carried out in accordance with the CSR Policy read with the Act and CSR Rules.
- The Board shall constitute an implementation group for the purposes of implementation of the CSR Activities approved by the Board from time to time (the “**Implementation Group**”) and submitting report of the progress on the CSR Activities to the Board as well as the CSR Committee.
- Mode of Implementation: The CSR Activities may be undertaken by the Company directly through the Implementation Group or with the prior approval of the Board,
  - i. Through a Trust, or a Society or a company established by the Company or its holding or subsidiary or associate company under Section 8 of the Act or otherwise; and/ or
  - ii. Through a Trust, or a Society or a company established under section 8 of the Act with a





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established track record of three years in undertaking similar programs or projects; and/ or

- iii. In collaboration with other companies or NGOs
- iv. In collaboration with any Industry Body coordinating such activities
- v. Direct contribution / implementation of any project approved by CSR committee / Board
- vi. Contribution to PM Relief Fund or any other fund as may be notified by Govt
- vii. Voluntary work undertaken by its employees and logged on to Global Volunteer Month web site or monitored in any other way by the company.

(the entities referred to under sub-clause (i) and (ii) above, are hereinafter referred to as **“Implementing Agencies”**).

- The CSR projects / programmes will be classified as under:
  - Ongoing Project - Multi-year CSR project / programme having timelines not exceeding three years excluding the financial year in which it is commenced and shall include CSR project /programme which was initially not approved as multi-year project/ programme but whose duration has been extended beyond one year by the Board of Directors of the Company based on reasonable justification; and
  - Other Projects - CSR projects/programmes which are not Ongoing Projects will be treated as other projects / programmes.
- The Board shall empower the Implementation Group to finalize, approve and execute various agreements, deeds, writings, confirmations, undertakings or other documents, as may be necessary, under the Common Seal of the Company or otherwise, with any party including Implementing Agencies and/or others for the purposes of the CSR Policy and accept modifications, changes and amendments to any such documents/ agreements as it may deem fit.
- In case of failure to ensure the minimum CSR Expenditure, details reasons for the same should be submitted by the Implementation Group to the Board, who shall include the same in their report.

## FORMULATION OF ANNUAL ACTION PLAN



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- Depending upon the timeline of implementation of a particular CSR Project / Programme, it shall be identified as an Ongoing Project or Other Project as per the parameters given above.
- The CSR annual action plan shall include the following:
  - The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
  - the manner of execution of such projects or programmes as specified in sub rule of rule 4 of CSR Rules;
  - the modalities of utilisation of funds and implementation schedules for the projects or programmes;
  - monitoring and reporting mechanism for the projects or programmes; and details of need and impact assessment, if any, for the projects undertaken by the Company.
  - The annual action plan would include the budget / outlay approved against the CSR projects / programmes to be undertaken.

#### **CSR EXPENDITURE BUDGET/ APPROVAL OF CSR PROJECTS / PROGRAMMES FOR CSR ACTIVITIES**

- CSR Committee shall recommend to the Board of Directors of the Company, the expenditure to be incurred on various CSR projects, programmes and activities and the annual action plan for a financial year and in case of an Ongoing Project, the total amount to be spent on the said project / programme over the years.
- The Board of Directors shall, after taking into account the recommendations made by the CSR Committee, approve the amount of expenditure to be incurred on CSR projects, programmes and activities and the annual action plan for a financial year and in case of an Ongoing Project, the total expenditure to be incurred on the said project / programme over the years, as it may consider appropriate.
- The Board or CSR Committee may delegate/sub delegate requisite powers for execution and implementation of this policy which may include powers for meeting any unforeseen and / or urgent requirements.
- The Board shall be responsible for sanctioning the CSR Expenditure and taking steps to ensure that the amount for the CSR Expenditure is available to the Implementation Group for application towards the CSR Activities.
- The Board shall ensure that the CSR Expenditure in a financial year not be less than two per cent of the average Net Profits of the Company made during the three immediately preceding



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financial years.

- Any surplus arising out of the CSR Activities shall not form part of the business profit of the Company and may only be re-allocated to the CSR Activities being undertaken in terms of this CSR Policy.
- In order to count towards CSR Expenditure, CSR Activities must be carried out in India and should not be solely for the benefit of the employees of the Company and their families.
- Any amounts contributed directly or indirectly to any political party under Section 182 of the Act will not count towards CSR Expenditure or considered a part of CSR Activities.
- Any amounts expended while undertaking activities in pursuance of normal course of business of a Company or on an item not in conformity or in line with activities set out in Schedule VII of the Act, will not form a part of CSR Expenditure.
- Board shall ensure that expenditure, if any incurred towards any capacity building exercise internally or of Implementing Agencies through institutions with established track record of at least three financial years, as the case may be, shall not exceed five percent of the CSR Expenditure in one financial year.

## MONITORING PROCESS

- To ensure that the objectives of CSR Policy are being met in an efficient and effective manner, the utilisation of the amount sanctioned towards CSR Activities should be reported by the Implementation Group to the Board as well the CSR Committee on an annual basis in such manner as the Board may direct.
- In the event any of the CSR Activities are undertaken through an Implementing Agency, the Implementation Group should obtain relevant information from the Implementing Agency and ensure that the progress on such CSR Activity is submitted to the Board as well the CSR Committee on an annual basis in such manner as the Board may direct.
- Upon receipt of such progress report by the Implementation Group, the CSR Committee may review and deliberate upon such reports and provide such inputs or recommendations, as it may deem necessary, to the Board.
- Notwithstanding anything to the contrary, the Board shall not be obliged to comply with the recommendations of the CSR Committee.





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## REPORTING AND RECORD KEEPING

- The CSR Committee shall maintain proper minutes of all its meetings.
- A yearly report on activities / projects identified / implemented shall be submitted to CSR Committee.
- The Board will be responsible to ensure that:
  - The report of the Board includes the annual report on CSR Activities of the Company and sets out the requisite information in terms of the Act and the Rules, as per the prescribed format given under the Act and the Rules;
  - The contents of the latest and updated version of the CSR Policy is included in the report of the Board;
  - The contents of such policy are also made available on the website (if any) of the Company;
  - In case of failure to ensure the minimum CSR Expenditure, detailed reasons for the same are adequately disclosed in the Board Report.

## AMENDMENT

The Board of the Company may, subject to compliance with applicable law, at any time alter, amend or modify the CSR Policy as it deems fit to comply with the statutory obligation of the Company to undertake the CSR Activities.

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