

**TATA STEEL COLORS**



Adopted on: June 2015

Revised on: November 2018

Revised on: April 2019

Revised on: October 2021

Resigned on: October 2023

Revised on: 30<sup>th</sup> April 2026

## Corporate Social Responsibility Policy

Tata Steel Colors Private Limited (Formerly Tata BlueScope Steel Private Limited) (hereafter referred as "The Company") has always endeavoured to conduct its business responsibly, mindful of its social accountability, respecting laws of the land and human rights of communities it serves.

In accordance with the provisions of the Companies Act, 2013 and the rules made thereunder, the Company will allocate funds towards CSR activities to improve the quality of life of the communities it serves and to sustain and improve a healthy and prosperous environment. The company shall positively impact and influence its employees and partners in fostering a sense of social commitment for their stakeholders.

### Vision

The Company's long-term CSR objective is ***to improve the quality of life of the communities it serves.***

### Scope

The Company's CSR will focus on four thrust areas – ***Education, Healthcare, Quality of Life and Environment.*** The Company may undertake CSR activities in other areas as per assessed needs of communities around it and as approved by the CSR Committee from time to time.

Company has derived 6 pillars out of these focus areas to categorise its projects effectively. Details are given in Annexure 1.

### CSR Project Execution Model

CSR is a Board-driven process and the Board of the Company is empowered to plan, decide, execute, and monitor the CSR activities of the company based on the recommendation of its CSR Committee. The CSR team is responsible for project design and execution (*Refer Annexure 2*)

The Company may undertake CSR activities on its own or through registered organizations (Section 8 Company, registered public trust or registered society, registered under Section 12A and 80G of the Income Tax Act), Government bodies, Educational institutes and Industry associations – individually or as a consortium – to design, fund, implement and review CSR projects. Such organization or implementing agency has to ensure that CSR-1 registration is obtained from the Ministry of Corporate Affairs.

### Target Communities and Geographies

While the Company will ensure that all communities benefit from our CSR activities, it would focus on those groups that are socially and economically marginalized. These would include Women, Children, Senior Citizens, Differently Abled individuals, Destitutes etc.

The Company's CSR activities will primarily be focused in urban as well as rural areas in the vicinity of its business operations. The Company may also undertake CSR activities based on the needs of the community in other geographies as recommended by the CSR Committee and approved by the Board from time to time.

The Company shall aim to integrate its CSR efforts with its Affirmative Action directives (as defined in *Annexure 3*).

## **Guiding Principles**

The selection, implementation and monitoring of CSR activities will be according to six guiding principles – Impact, Partnerships, Affirmative Action, Volunteering, Business Connect and Communication. (Refer *Annexure32*)

## **Impact Assessment**

According to the rules under section 135 of Companies Act 2013, as amended from time to time, impact assessment is mandatory if the average CSR obligation of the company is ₹ ten crore or more in the three immediately preceding financial years, of CSR projects having outlays of Rs. One crore or more and which have been completed not less than one year before undertaking the impact study The impact assessment reports shall be placed before the Board and shall be annexed to the annual report of CSR.

Notwithstanding the above, even if the Company does not fall within the mandatory applicability of the impact assessment provisions, the Company will, as and when required, undertake independent third-party impact assessments of its CSR projects to evaluate its effectiveness and outcomes.

## **Treatment of Funds**

The Company will aim to utilize its stipulated funds for various CSR projects. Any amount remaining unspent, pursuant to any ongoing project, fulfilling such conditions as may be prescribed, 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 and, unless the unspent amount relates to any ongoing project, transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. Excess amount spent on CSR in a given financial year can be set off for up to 3 succeeding financial years with the approval of the Board.

‘Ongoing Project’ will mean a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall also include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.

Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account or to a Fund specified in Schedule VII, as the case may be.

## Review of Policy

This CSR policy document will be reviewed as and when required by CSR Committee and any changes, if necessary, will be approved by the Board on the recommendation of the CSR Committee.

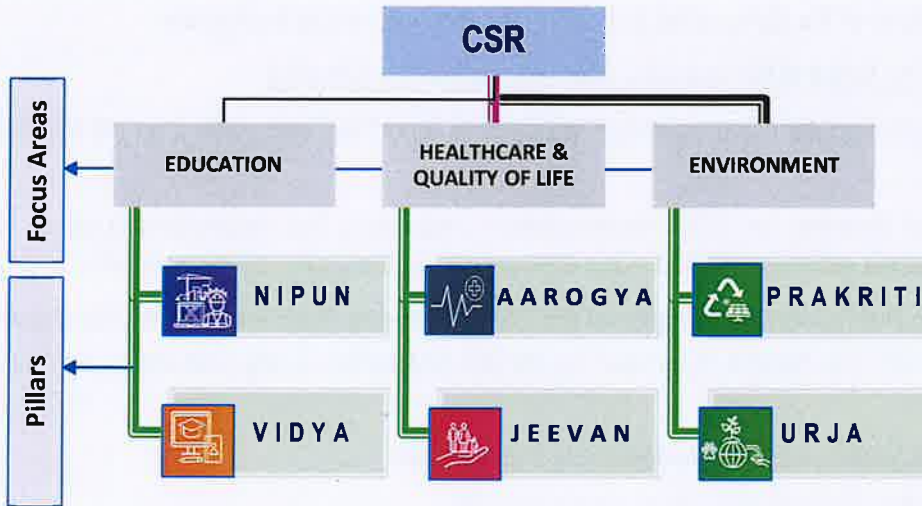
Recommended by CSR Committee in its meeting held on 19<sup>th</sup> March 2026 and approved by the Board of Directors in its meeting held on 30<sup>th</sup> April 2026



**Praveen V. Thampi**  
**Managing Director**

**Date: 30<sup>th</sup> April 2026**

### Annexure 1: CSR Pillars



#### Explanation of Pillars:

**NIPUN:** All skill development projects fall under the pillar NIPUN E.g. CIDC, PARFI, Tata Strive etc.

**Vidya:** All projects related to children's education fall under the pillar VIDYA. E.g. Door Step School, Bal Raksha Bharat, Schools' Infrastructure Development etc.

**AAROGYA:** All direct health intervention fall under the pillar AAROGYA. E.g. Sri Sathya Sai Sanjivani, Medical Equipment to various hospital etc.

**JEEVAN:** All quality of life projects fall under the pillar JEEVAN.. E.g. Janaseva Foundation, Antyoday Bhavan etc.

**Prakriti:** All green cover development or rainwater harvesting projects fall under the pillar Prakriti,

**URJA:** All renewable energy projects fall under the pillar URJA.

## Annexure 2: Implementation and Governance

In accordance with the provisions of the Companies Act, 2013 and the rules made thereunder:

1) The responsibilities of the Board of the company, inter-alia, include the following:

- Approve CSR policy and disclose contents of such policy in its report and also place it on the company's website
- Provide approach and direction for CSR implementation considering the recommendations of CSR Committee. Ensure that the activities included in the CSR policy are undertaken by the company.
- Approve Annual Action Plan on recommendation of the CSR Committee (note: the plan may be altered by the Board, if required with due process of law and appropriate justification at any time during the financial year)
- Ensure that the company spends its CSR budget every financial year
- Satisfy itself regarding the utilisation of the disbursed CSR funds
- Specify the reasons for not spending the amount and transfer the unspent CSR amount as per provisions of sections 135(5) and 135(6) of the Act

2) The CSR committee of the Board shall be responsible to:

- Recommend the CSR policy to the Board. Monitor the policy from time to time and provide suggestions to the Board, as applicable.
- Review and recommend to the Board, an Annual Action Plan formulated by CSR team in pursuance of CSR policy.
- Monitor the implementation of the project in line with the approach and direction given by the Board with reference to the approved timelines and year-wise allocation and make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- Ensure that the funds so disbursed are utilized for the purposes and in the manner as approved by the Board and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- Approve utilisation of funds from the Unspent CSR Fund Account for the Ongoing projects approved by the Board for reporting purpose and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- Ensure that Administrative Overheads and Impact Assessment do not exceed 5% each of total CSR expenditure of the company for the financial year and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- Ensure that if the CSR amount is spent by the company for creation or acquisition of a capital asset, it should be held by -
  - (a) a company established under section 8 of the Act, or a Registered Public Trust or Registered

Society, having charitable objects and CSR Registration Number; or

(b) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or

(c) a public authority;

3) Role of the Chief Financial Officer (CFO) or the person responsible for financial management

CFO or the person responsible for financial management shall certify that the CSR spends are utilized for the purpose and in the manner as approved by the Board.

4) CSR team shall be responsible to:

- Formulate and recommend to the CSR Committee, the CSR policy and Annual Action Plan in pursuance of the CSR policy including list of projects, manner of execution, schedules, utilization of funds, monitoring and reporting mechanisms etc.
- CSR team shall be responsible for 100% utilisation of CSR funds as approved by Board of Directors, within the variation limit of 15% per focus area.
- Committee's approval is required if there is any variation beyond 15% (*both plus and minus*) of the allocated budget of any focus area.
- Support the CSR Committee to govern and review the CSR activities of the company from time to time
- Provide regular inputs for the Director's Report and Annual report as per requirements of section 135 of Companies Act, 2013

### **Annexure 3: Guiding Principles for CSR**

#### **Impact**

All CSR initiatives will have well-defined KPIs to measure impacts on the target groups. Feedback will be a key input for redesign and / or rollout of further initiatives.

#### **Partnerships**

The Company may engage closely with Tata Steel Limited / Tata Trusts /Tata Group Section 8 Companies and work jointly on projects which are aligned to its CSR strategy and in its operational areas. The Company will also leverage the products and services of group companies for its CSR initiatives in alignment with its CSR strategy.

#### **Affirmative Action**

The Company will design targeted interventions for Scheduled Castes and Scheduled Tribes to promote Education, Employability, Employment and Entrepreneurship. The Company will also work on promoting Ethnicity to preserve the cultural fabric of these communities.

#### **Volunteering**

The Company will encourage to providing opportunities to its employees and their families to engage in volunteering that will benefit the communities in which they live and work, and at the same time, support the Company's own CSR activities. This will not only deepen local community connect but will also leverage in- house skills in addressing social challenges, thereby creating both social and business impacts.

#### **Expertise**

The Company will aim to undertake more projects within its own area of expertise i.e. prefabricated steel and building construction. The execution of such projects will be through the Company's authorized service providers.

#### **Communication**

The Company will have a two-way communication channel, so that the stakeholders' needs, expectations and aspirations can be mapped and their feedback and satisfaction levels can be obtained and assessed for the purpose of design and improvement of initiatives.