

ASAL

AUTOMOTIVE STAMPINGS AND ASSEMBLIES LIMITED

**CORPORATE SOCIAL
RESPONSIBILITY (CSR) POLICY**

ASAL

AUTOMOTIVE STAMPINGS AND ASSEMBLIES LIMITED

Document Title	Corporate Social Responsibility (CSR) Policy
Originally framed	October 20, 2014
Last Revision Date	April 28, 2017
Current Revision Date	August 06, 2024
Authority approving the Policy	Board of Directors

ASAL

AUTOMOTIVE STAMPINGS AND ASSEMBLIES LIMITED

The Board of Directors of the Company, after taking into account the recommendations of the CSR Committee has approved this CSR Policy for the Company. As required under Section 135(4), the Company will disclose contents of this policy in its Annual Report and the same shall be displayed on the Company's website as per the particulars specified.

Core Values of the Company

To improve the quality of life of the communities the Company serves through long term stakeholder value creation.

Philosophy of CSR

The Company will make a positive impact on the Society and Community through CSR activities which develops/improves their economic status and conserves the environment.

Functions of CSR Committee

The Corporate Social Responsibility Committee shall -

- (i) Formulate and recommend the CSR policy to the Board;
- (ii) Recommend the amount of expenditure to be incurred on CSR activities;
- (iii)** Monitor the CSR policy of the company from time to time; and
- (iv) Formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the items as mentioned in rule 5(2) of the Companies (CSR Policy) Rules, 2014.

Definition and Scope

In this policy, unless the context otherwise provides/requires, words and expressions used in the policy shall have the same meanings respectively assigned to them in The Companies Act, 2013 or rules made thereunder.

In the event of any conflict between Company Policy and applicable Acts and Regulations of SEBI, the provisions of the Acts and Regulations shall supersede the Company Policy.

Purpose of CSR Activities

CSR Activities will be carried as per Section 135 of The Companies Act, 2013 read with schedule VII.

ASAL

AUTOMOTIVE STAMPINGS AND ASSEMBLIES LIMITED

1. To serve and be seen to serve the society to fulfill local and national goals in all the countries where the Company operates.
2. To provide opportunities for the Company's employees to contribute to these efforts through volunteering.

Surplus, if any, arising out of CSR activities shall be ploughed back into CSR and shall not be a part of business profits.

Resources for CSR

The Company proposes to deploy the following resources for our CSR activities:

1. Funds:

At the minimum, what is required by law (i.e. 2% of average net profits of the past 3 years as per India's Companies Act, 2013 for companies operating in India).

2. Expertise:

Of Company's CSR Committee through structured volunteering program Products and Services of the Company: Expertise of Internal skill development Centers.

3. Facilities:

The Company's plants to build skills in areas relevant to the Business of the Company.

Resources from Company's Business Partners: Synergize Company's efforts with that of Holding Company {Tata AutoComp Systems Limited (TACO)}, Customers and Suppliers.

Resources from other companies within and outside the TACO group: Look for opportunities of Synergies with like-minded organizations outside TACO group Companies.

- a. The spend on CSR will need resourcing directly by the Company by setting up an exclusive CSR department or a Trust of its own or by collaborating with other NGOs. It is clarified that CSR Regulations allow donations to other tax exempted NGOs provided the funds are earmarked as a part of the corpus of that NGO and are used for the specified purposes stated by the Company. This route will also be taken where ever required.

The CSR spend will include both revenue and capital expenditure and

ASAL

AUTOMOTIVE STAMPINGS AND ASSEMBLIES LIMITED

the expenditure incurred on capacity creation is counted towards CSR (only up to 5% of the total CSR budget) is counted towards CSR.

- b. Any unspent balance of the funds allocated for CSR activities will be disclosed in the Board's Report along with the reasons therefor and any surplus arising out of CSR funds shall be ploughed back into CSR and shall not form part of the business profit of the Company.

Sectors and issues

A) Skills

The Company will through its skill development centers and the ITI's adopted by the Company to build skill in youths. This would be through vocational training and guidance which will ultimately lead to their livelihood.

In addition community development initiatives will also be run by employees' families who can teach women in rural places about dress designing, cooking, etc.

B) Early childhood Education/orphanages/physically challenged

The Company encourages volunteering by employees to support early education and health of children living in orphanages. The support would be provided for their education, ration, medical treatment, books, etc.

C) Environment Conservation

The Company will focus on various activities which conserves the environment e.g. Tree plantation, focus on 3R (Reduce, Reuse, Recycle), etc.

D) Other Initiatives

In addition, the Company would support during natural disasters, calamities and other TATA group initiatives. However, for disaster & calamity spend, the spend should be on account of medical aid (promoting & preventive health care), food supply (eradicating hunger, poverty and malnutrition) & supply of clean water (sanitation and making available safe drinking water).

The Company will identify specific projects and programs under the above sectors chosen for the CSR spend. It is important to note that one off activities such as marathon; awards etc. are not recognized as CSR. Also the programs should not be a part of Company's normal business activities.

ASAL

AUTOMOTIVE STAMPINGS AND ASSEMBLIES LIMITED

Geographies and target communities

The geographical focus of the Company's CSR activities will be where the Company has a significant presence. Currently, these are the states of Maharashtra, Gujarat, Jharkhand, Uttarakhand and other states where Plants of the Company are located. In these geographies, the Company would concentrate its efforts on villages and habitations within 100 km radius of the Company's plants and offices.

While the Company will ensure that all communities benefit from its CSR activities, the Company would focus on those groups that are socially and economically marginalized. This would include physically challenged, girl children, scheduled casts and tribes.

Implementation Mechanism

The Company will implement the CSR through in house teams and by involving families of employees.

The Company may also take help of TATA trusts as per TATA group directions.

Monitoring Mechanism

Each of the Company's CSR projects and programs would have clearly defined output, outcome and process indicators which will have to be reported at specified frequencies. All projects and program will be monitored by the Board appointed CSR Committee. The monitoring process will cover any modifications to the policy, including the CSR structure, program and financial reviews. The CSR Committee will report to the Board.

All projects and program which require Annual Financial Audit or Impact Assessment as per The Companies Act, 2013 and The CSR Rules made thereunder shall be subjected to such annual financial audit and Impact Assessment by a third-party auditor.

All the projects recommended above would be evaluated from the perspective of time frames and social impact. The Company would also ensure accountability for the funds invested in the NGO's project through continuous monitoring of the project's progress.

The CSR Committee shall work closely with Internal CSR team and convene periodic meetings to monitor both the process and progress and maintain a summary of the discussions for good record. The CSR Committee will in turn keep the Board informed.

ASAL

AUTOMOTIVE STAMPINGS AND ASSEMBLIES LIMITED

Composition of CSR Committee

In terms of the provisions of section 135 of the Companies Act, 2013 and the Rules made thereunder, a Board Committee is constituted. The Board Committee will provide guiding directions to the Company on matters of CSR and will regularly monitor progress.

The Committee shall approve all CSR projects/programs greater than Rs. 10 lakhs in a year. It will also approve the NGOs with whom the Company will collaborate or contribute to for CSR programs. The Committee will also prepare the draft CSR report at the end of the year for approval by the Board for reporting to the shareholders. The Committee should meet as and when required.

For implementation of the overall directions set by the Board Committee, the Company will form Internal CSR team which will have employees from all sections. The Internal CSR team will do the implementation and report back to the Board Committee on:

- a) The Company' CSR performance.
- b) Updates on new projects from time to time.

Reporting:

The Company's Annual Report would include the annual report on CSR as per the particulars specified under The Companies Act, 2013 and The CSR Rules made thereunder.

The Report shall include a responsibility statement of the CSR Committee that the implementation and monitoring of CSR Policy, is in compliance with CSR objectives and Policy of the Company.

The Annual Report on CSR Activities shall be signed by the CEO or the MD a also the Chairman of the CSR Committee.

ASAL

AUTOMOTIVE STAMPINGS AND ASSEMBLIES LIMITED

Listing of CSR Program

Sl. No	CSR Project or activity identified	Sector in which the project is covered	Projects or Programs 1) Local area or other 2) specify the State and District where projects or programs was undertaken	Amount outlay (budget) project or program s wise	Amount spent on the projects or programs Sub heads: 1. Direct expenditure on projects or programs 2. Overheads	Cumulative expenditure up to the reporting period	Amount spent Direct or through implementing agency
1							
2							
3							
4							