

Shalimar Wires Industries Limited

CIN: L74140WB1996PLC081521

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CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Pursuant to Section 135 of the Companies Act, 2013 (the Act) read with rules thereunder, the Board of directors of Shalimar Wires Industries Limited ('Board') have formulated this statement containing the approach and direction to fulfill the CSR obligations, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

SHALIMAR WIRES INDUSTRIES LIMITED'S CSR APPROACH

At Shalimar Wires, we believe in a responsible shared value approach to augment industrial growth together with actions directed to create prosperity among all our stakeholders, employees and the community at large. Our Company has all along voluntarily contributed to the community in various forms including monetary donations and aid given to non-profit organizations and registered charitable Trusts. The Company is into the business of manufacturing of Jute Goods which act in itself is to promote a bio degradable and environmental friendly product.

AREAS EMPHASIZED FOR CSR PROGRAM

In line with CCL's above approach, our CSR Policy is to direct CSR Programme towards initiating one or more of the following activities:-

1. To establish, promote, support, maintain, help, run and grant aid to schools and other educational institutions for promotion of education;
2. To establish, promote, support, maintain, help, run and grant aid to dispensaries, hospitals, nursing homes, child welfare centre for promoting preventive health care and sanitation;
3. To establish, maintain and/or grant aid to old age homes, orphanages or other establishments for relief of and to give help to the poor and destitute people, orphans and widows;
4. To provide food, clothing and/or shelter for the poor and/or needy persons and to give help to them;

5. To enhance skill development especially among children, women, elderly and the differently abled;
6. To construct toilets to encourage hygienic sanitation;
7. To contribute for any other activity as specified in Schedule VII of the Companies Act, 2013 as may be decided.

IMPLEMENTATION OF CSR PROGRAMMES

Annual Action Plan

The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall include the following, namely:-

- (a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- (b) the manner of execution of such projects or programmes as specified in sub-rule (1) of rule 4 of the Companies (Corporate Social Responsibility Policy) Rules, 2014;
- (c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- (d) monitoring and reporting mechanism for the projects or programmes; and
- (e) details of need and impact assessment, if any, for the projects undertaken by the company.

Provided that the Board of directors may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

The CSR activities shall be implemented by the company itself or through other entities that have register itself with the Central Government by filing the form CSR-1 electronically with the Registrar to undertake any CSR activity. In such cases, the committee will decide the CSR Programmes which may be undertaken by these entities our CCL's CSR Program.

MANAGEMENT AND MONITORING MECHANISM OF CSR PROGRAMMES

- (I) CSR Committee will propose CSR Programmes to be carried out during each financial year and the estimated amount thereof for approval of the Board. The Board will consider and approve such programmes.
- (II) CSR Committee will submit its report to the Board at the end of each financial year of the Company based on which Board shall include an annual report on CSR containing necessary particulars in a

format provided under Rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended.

UNSPENT CSR IN ANY FINANCIAL YEAR

If the company fails to spend the CSR amount in any financial year, the Board shall, 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.

CSR EXPENDITURE

CSR expenditure will include all expenditures / contributions made by the Company to registered charitable Trusts to be spent on CSR Programmes undertaken in accordance with approved CSR plan. In this connection, it is declared that in the event any CSR Programme is directly implemented by the Company, then any surplus arising out of such CSR Programme will not form part of the business profits of the Company. Such surplus shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

ONGOING PROJECT

The company may undertake multi-year project to fulfil its CSR obligation within three years excluding the financial year in which it is commenced. Such project shall also include activities that were initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification by the CSR Committee.

EXCESS CSR EXPENDITURE IN ANY FINANCIAL YEAR

Where in any year, the company spends an amount in excess of requirement provided under section 135(5) of the Act, such excess amount shall be set off against the requirement to spend under section 135(5) of the Act up to immediate succeeding three financial years subject to the conditions that the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, and the Board of the company shall pass a resolution to that effect.

COMPOSITION OF CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

Name of the directors	Designation	Category
Mr. Sunil Khaitan	Chairperson	Executive Director
Mr. Vedant Khaitan	Member	Executive Director
Mr. Parmanand Tiwar	Member	Independent Director
Dr. Rajiva	Member	Independent Director
Mrs. Trishna Guha	Member	Independent Director

DISPLAY ON THE WEBSITE

The composition of the CSR Committee, CSR Policy and CSR Projects approved by the Board / CSR Committee from time to time shall be disclosed on the website of the Company i.e www.shalimarwires.com

REVIEWED AND ADOPTED BY THE BOARD OF DIRECTORS AT THEIR MEETING HELD ON 22nd May, 2025