ABHAY ISPAT (INDIA) PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

I. PREAMBLE

The Ministry of Corporate Affairs (MCA), Government of India has notified Section 135 and Schedule VII of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014 ('Rules"). Thereby, pursuant to the notification issued by the MCA dated 27th February, 2014, the Company has framed the Corporate Social Responsibility (CSR) Policy.

It is, and shall be, the policy of Abhay Ispat (India) Private Limited ("AIIPL") to reach out to underserved communities. We believe in the trusteeship concept. This entails transcending business interests and grappling with the "quality of life" challenges that underserved communities face, and working towards making a meaningful difference to them.

To actively contribute to the society, by undertaking/ implementing from time to time, the projects or programs falling within the purview of the Schedule VII of the Act, as amended from time to time.

The Company shall adopt the best practices prescribed by MCA from time to time to the extent applicable and shall make appropriate modifications, if any, necessary to this Policy to conform to the standards so prescribed.

The Board of Directors of the company and the CSR Committee are responsible for implementing the CSR Policy and monitoring process of the projects or programs undertaken.

II. EFFECTIVE DATE:

The CSR Policy was placed before the Board of Directors of CCPL at its meeting held on 28th May, 2014, and the Board approved the same. This CSR Policy shall come into effect from 1st April, 2014. CSR Policy is posted on website of the Company on <u>www.abhayispat.com</u>.

III. CSR SURPLUS AND EXPENDITURE

The surplus arising out of the CSR programs or activities shall not form part of the business profit of a company.

CSR expenditure shall include all expenditure including contribution to corpus for projects or programs relating to CSR activities approved by the Board on recommendation of its CSR Committee, but do not include any expenditure on an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act.

IV. CSR REPORTING

The Board's Report of a company covered under the Companies (Corporate Social Responsibilities Policy) Rules, 2014 pertaining to a financial year commencing on or after 1st day of April, 2014 shall include in an annual report on CSR containing particulars specified in Annexure to these rules.

For & on behalf of the Board of Directors Abhay Ispat (India) Private Limited

Sd/-

Vinesh T. Mehta Director DIN - 00376381

Mumbai, 28th May, 2014