GUJARAT VICTORY FORGINGS LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

[ADOPTED BY BOARD ON 12TH MARCH, 2026]

DESCRIPTION OF DOCUMENT: *This document provides a brief description of the Corporate Social Responsibility Policy at Gujarat Victory Forgings Limited.*

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CORPORATE SOCIAL RESPONSIBILITY POLICY

The following is the Corporate Social Responsibility Policy (the **"Policy"**) adopted by Gujarat Victory Forgings Limited (hereinafter referred to as the "**Company**") in accordance with the provisions of the Articles of Association of the Company and Section 135 of the Companies Act, 2013 ("**the Act**") read with Schedule VII of the Act and Companies (Corporate Social Responsibility) Rules, 2014 ("**CSR Rules**") including any amendments therein from time to time.

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1. INTRODUCTION

The Company is committed to the vision of giving back to society and helping the inclusive growth of the deprived community. Our strategic corporate social responsibility projects are aimed at providing education to underprivileged people, providing infrastructure to government schools to run smoothly. The Company has been carrying out corporate social responsibility activities by Directly fulfilling CSR obligation.

2. CORPORATE SOCIAL RESPONSIBILITY PURPOSE STATEMENT

The Company shall seek to impact the lives of the disadvantaged by supporting and engaging in activities that aim to improve their wellbeing. We are dedicated to the cause of empowering people, educating them and improving their quality of life. While we will undertake programme based on the identified needs of the community and education shall remain our priority. Across the different programme areas identified by the Company, it would be our endeavour to reach the disadvantaged and the marginalized sections of society to make a meaningful impact on their lives.

The Company is committed to identifying and supporting programmes aimed at:

(i) Achieving positive, sustainable change in the underprivileged community;

(ii) Empowerment of the disadvantaged sections of the society through education, access to and awareness about financial services and the like;

(iii) Work towards eradicating hunger and poverty, through livelihood generation and skill development;

(iv) Any other programme that falls under our corporate social responsibility purpose including those listed in schedule VII of the Act as may be amended from time to time or as may be permitted by MCA from time to time and is aimed at the empowerment of disadvantaged sections of the society.

3. DEFINITIONS

3.1. **"Board"** or **"Board of Directors"** means the Board of Directors of the Company as constituted from time to time.

3.2. **"Company"** means Gujarat Victory Forgings Limited.

3.3. **"CSR"** means corporate social responsibility.

3.4. "**CSR Activities**" means such programs and projects as may be approved by the Board in terms of this CSR Policy.

3.5. "**CSR Committee**" means a committee constituted by the Board of Directors in terms of Section 135 of the Act and the CSR Rules.

3.6. **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.

3.7. **"HR"** means the human resource department of the Company.

3.8. **"MCA"** means Ministry of Corporate Affairs

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3.9. "**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.

4. SCOPE

4.1. CSR activities shall exclude activities undertaken in pursuance of normal course of business.

4.2. This Policy will apply to all projects/programmes undertaken as part of Company's CSR and will be developed, reviewed and updated periodically with reference to relevant changes in corporate governance, international standards and sustainable and innovative practices.

4.3. The Policy will maintain compliance and alignment with the activities and rules of Schedule VII and Section 135 of the Act.

5. NORMAL COURSE OF BUSINESS

5.1. The Company is engaged in the business of manufacturing of non-ferrous metal products by way of processing and recycling of non-ferrous metal scrap.

5.2. The product portfolio comprises high purity copper cathodes typically ranging between 99.96%-99.99% copper, copper related products such as copper tubes and pipes, copper ingots, copper busbar, copper rods, copper alloy rods, copper coil, brass tubes and pipes. (collectively referred as "**Copper related products**") and Master Alloys of Copper such as copper arsenic alloys, copper phosphorus alloys, copper nickel alloys, chromium zirconium alloys and copper silicon alloys (collectively referred as "Master Alloys of Copper") which find applications in various industries including power infrastructure, EV & Automotive, construction & real estate, renewable energy and its storage, among others. Our products are customisable to the requirements of our customers, with respect to the level of purity and/or composition with other metal and non-metal that conform to international standards.

6. GOVERNANCE

6.1. The approval of the CSR Policy and oversight is the responsibility of the Company's Board of Directors.

6.2. The responsibility of the CSR Committee is to promote the strategy and to administer the Policy through implementing partner(s) or via self-implementation.

6.3. The CSR Committee shall provide guidelines for projects/partner selection to the respective HR or CSR teams, wherever applicable.

6.4. The CSR Committee shall ensure that projects/programmes are compliant with regulations and are monitored and reported effectively.

7. ANNUAL ACTION PLAN

7.1. The CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of this Policy, which shall include the following, namely:

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(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 or as may be permitted;

(b) the manner of execution of such CSR projects or programmes;

(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.

7.2. Based on the recommendation of the CSR Committee, the Board may alter the action plan at any time during the financial year, based on a reasonable justification to that effect.

8. CSR EXPENDITURE

8.1. The Act has prescribed and recommended the expenditure amount on CSR to be 2% of the average net profits of the Company, during the three immediately preceding financial years.

8.2. In accordance with the regulations, if the Company is unable to make this expenditure, appropriate reasons shall be provided in the CSR report, which would form a part of the annual report of the Company.

8.3. The CSR Committee shall recommend to the Board the amount of expenditure to be incurred on the CSR activities to be undertaken by the Company in areas or subjects specified in Schedule VII of the Act or as may be permitted by MCA from time to time.

8.4. Unspent CSR amount

(i) Any amount remaining unspent pursuant to any ongoing project shall be transferred within the stipulated period stated in the Act/Rules to a separate bank account designated in the name of the Company.

(ii) The amount so transferred to the unspent CSR account should be utilized within three financial years from the date of such transfer failing which the amount unspent at the end of the third financial year should be transferred to a Fund specified in Schedule VII or by the MCA from time to time within the time prescribed in the rules (currently six months from the expiry of the third financial year).

8.5. **On-going project** for the purpose of this Policy means an on-going project as defined under the Rules. Any amount remaining unspent in respect of any project not being an on-going project shall be transferred within the stipulated period stated in the Act/Rules to the fund specified in Schedule VII or by the MCA from time to time.

8.6. Surplus

(i) Any surplus arising out of CSR activities should form part of business profits of the Company.

(ii) Treatment of Surplus:

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In accordance with Rule 7(2) of the Companies (Corporate Social Responsibility Policy) Rules, 2014, any surplus arising out of CSR projects undertaken by the Company shall not form part of the business profits of the Company, and shall be ploughed back into the same project, or transferred to the Unspent CSR Account and spent in pursuance of the Company's CSR Policy and annual action plan, or transferred to a fund specified in Schedule VII of the Act, within six months of the expiry of the financial year.

8.7. Excess CSR spend

(i) Any amount spent in excess of the requirement under Section 135 of the Act may be set off against the CSR obligation under Section 135 of the Act up to immediate succeeding three financial years subject to the conditions that:

(a) the excess amount available for set off should not include the surplus arising out of the CSR activities, if any.

(b) Setting-off of the excess CSR spend requires the approval of the Board.

9. IMPLEMENTATION

9.1. The Company shall undertake CSR project/programmes identified by the CSR Committee and approved by the Board of directors in line with the CSR Policy.

9.2. The Company shall implement its CSR programmes/projects:

(i) Through an implementation partner that can be a public charitable trust or a society registered under applicable Acts or a Company registered under Section 8 of the Act which satisfies the conditions prescribed in the Rules;

With effect from 1st April, 2021 implementation partners are required to register themselves with the central government in the manner as laid down in the Rules. The Company should engage with only registered implementation partners to undertake CSR activities.

or

(ii) On its own, through the relevant HR or CSR department or

(iii) through its own foundation (if applicable) specifically created for implementing its CSR initiatives.

9.3. The Company can engage international organisations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR Policy as well as for capacity building of the Company's own personnel for CSR.

9.4. The Company may also enter into partnerships or alliances with NGOs, trusts, or other corporate foundations etc. to effectively implement its CSR programmes/projects.

9.5. The Company can also collaborate with other company(ies) for undertaking projects or programmes or CSR activities in such a manner that the CSR Committee is in a position to report separately on such projects / programmes.

9.6. The Company shall formulate criteria and procedure for selection, screening and due diligence of its implementing partners.

9.7. Any creation or acquisition of a capital asset out of the CSR funds should be strictly undertaken in the manner prescribed in the Rules.

10. CSR PROGRAMMES/PROJECTS

10.1. The Company would be adopting a focused and structured approach towards implementing its CSR initiatives.

10.2. It has identified thematic and programme areas to guide the design, intent and approach of its CSR initiatives. These are broad thematic areas with a focus on quality service delivery and empowerment.

10.3. The programme areas are:

(i) Providing basic health care facilities to economically backward societies across geographical areas.

(ii) Improving access to education

(iii) Provision of skill development/vocational training

(iv) Rural development

(v) Environmental sustainability

(vi) Promoting sports, arts & culture

(vii) Sustainable livelihood including setting up old age homes, day care centres and such other facilities for senior citizens

(viii) Road safety campaign

(ix) Disaster relief programmes

(x) Women empowerment

(xi) Any other programme that falls under CSR Policy and which are in alignment with the activities listed in Schedule VII and Section 135 of the Act and the CSR Rules.

11. MONITORING OF CSR ACTIVITIES AND REPORTING

11.1. The CSR Committee will oversee the implementation and monitoring of all CSR projects/ programmes and periodic reports shall be provided for review to the Board.

11.2. The Company will institute a well-defined, transparent monitoring and review mechanism to ensure that each CSR project/programme has:

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(i) Clear objectives developed out of the societal needs that may be determined through need assessment studies and research (secondary or primary);
(ii) Clear targets, timelines and measurable indicators, wherever possible;
(iii) A progress monitoring and reporting framework that is aligned with the requirements of Section 135 of the Act and the CSR Rules.

11.3. The Board should ensure that the administrative overheads do not exceed five percent of the total CSR expenditure for a financial year.

11.4. The Board should satisfy itself that the funds disbursed towards CSR have been utilized for the purposes and in the manner as approved by it.

11.5. The chief financial officer shall certify to the Board at the meeting where the CSR spend utilization is reviewed for the financial year that the funds disbursed have been utilised for the purposes and in the manner as approved by it.

11.6. In case of ongoing projects, the CSR Committee should monitor the implementation of the project with reference to the approved timelines and year- wise allocation. The CSR Committee can make modifications for implementation of on-going projects within the overall permissible time period.

12. REPORTING AND DISCLOSURES

The Board's report should include the annual report on CSR containing the particulars as specified under the Act and CSR Rules.

13. PARTNER QUALIFICATIONS

If a third party is employed to carry out the implementation of our CSR projects, it will be ensured that they have a clearly explained mission/vision and an established track record of 3 (three) years in undertaking similar projects or programmes. The implementation agencies should be able to produce their latest audited annual reports and in case of an NGO, they should also be able to produce their registration forms according to 80G/12A of the Income Tax Act, 1961.

14. IMPACT ASSESSMENT

14.1. In case the average CSR obligation in the immediately three preceding financial years is ten crores or more, then Company shall undertake an impact assessment of its projects with outlay of one crore rupees or more.

14.2. The impact assessment report should be placed before the Board and annexed to the annual report on CSR.

15. COMPOSITION OF CSR COMMITTEE AND DISCLOSURES

Corporate Social Responsibility Committee

Name of Directors	Designation on the Board	Position on the Committee
Rahul Vijendra Agrawal	Executive Director	Chairperson
Vijendrakumar Bishamber Gupta	Executive Director	Member
Navin Kumar Mittal	Non- Executive Director	Member

The composition of the CSR Committee, CSR Policy of the Company and projects approved by the Board should be displayed on the Company's website.

16. REVIEW AND AMENDMENTS

Any subsequent amendment/modification in the Act, CSR Rules and/or other applicable laws in this regard shall automatically apply to the Policy.

The Board (including its duly constituted committees) may, from time to time, make amendments to this Policy to the extent required due to changes in the Act and applicable laws or as deemed fit on a review. The modifications, if any, made to the Policy shall be disclosed on the website of the Company.

(This Policy is approved and adopted by the Board of Directors of the Company in its meeting held on 12th March, 2026)

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Date of the approval by the Board: **12th March, 2026**

For and on behalf of Board
Gujarat Victory Forgings Limited
(Formerly Known as Gujarat Victory Forgings Private Limited)





Rahul Vijendra Agrawal
Chairman & Managing Director
DIN: 02523976