



**MMTC-PAMP CORPORATE SOCIAL
RESPONSIBILITY POLICY**

I. CONTEXT AND PHILOSOPHY

MMTC-PAMP Corporate Social Responsibility Policy “CSR Policy” has been laid down to integrate its business values and operations with the objective of creating value for our stakeholders. MMTC-PAMP has been an early adopter of Corporate Social Responsibility (‘CSR’) initiatives and focused on contributing to several community initiatives such as ensuring access to safe drinking water, providing vocational skills, promoting education, environmental sustainability and preventive healthcare. We have made forward leaps in women empowerment, extending our support to prepare women in achieving fulfilling careers, and creating a cadre of successful women professionals. Our talented employees are volunteering with great excitement in initiatives that bring our core group beliefs of inclusivity and sustainability to life. We are committed to inculcating the same spirit going forward in bringing a meaningful, sustained change to the society and people around us.

II. CSR FRAMEWORK

A. FOCUS AREAS

In accordance with the requirements under the Companies Act, 2013, MMTC-PAMP’s CSR activities, amongst others, will focus on:

MAKING AVAILABLE SAFE DRINKING WATER	Making available safe drinking water through focus on installing as well as maintaining highly energy efficient Reverse Osmosis Water Purification Systems
EDUCATION	Promoting education, including special education and employment-enhancing vocational skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies.
PROMOTING HEALTH CARE INCLUDING PREVENTIVE HEALTH CARE AND SANITATION	Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation
ENVIRONMENTAL SUSTAINABILITY	Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining the quality of soil, air and water.
GENDER EQUALITY AND EMPOWERMENT OF WOMEN	Supporting uplift of women in difficult circumstances and granting scholarship, campus development grant, academic resources including setting up homes, hostels and day care centers for women and orphans; setting up old age homes and such other facilities for senior citizens; and adopting measures for reducing inequalities faced by socially and economically backward groups.
RURAL DEVELOPMENT PROJECTS	Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.
RURAL SPORTS	Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.

DISASTER RESPONSE	Managing and responding to disaster
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Note-Complete Schedule VII of Companies Act 2013 shall be part of this policy annexed as Annexure no. 1

B. UNDERTAKING CSR ACTIVITIES

MMTC-PAMP's will undertake its CSR activities, approved by the CSR Committee, through its volunteers or such other entity/organization as approved by the CSR Committee. The indicative list of due diligence documents required are endorsed as Annexure no. 2. The surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the Company. CSR activities does not include the activities undertaken in pursuance of normal course of business of a company.

C. LOCATION OF SCR EFFORTS

MMTC-PAMP's focus areas for community development projects will be the States in which it has operations. The Company may also periodically take up programs of national importance outside its core States.

III. COMPOSITION OF CSR COMMITTEE

The CSR Committee shall be comprised in accordance with the requirements of the Companies Act, 2013 and the Rules made thereunder including any amendment thereof.

IV. RESPONSIBILITY OF THE COMMITTEE

The responsibilities of the CSR Committee include:

- To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII of Companies act 2013;
- To recommend the amount of expenditure to be incurred on the activities referred to in clause (a); and
- Monitor the Corporate Social Responsibility Policy of the company from time to time.

V. IMPLEMENTATION AND MANAGEMENT OF CSR

A. DELIVERY MECHANISM

MMTC-PAMP shall consider 3 implementation models for delivering its CSR programs.

- Through forming partnerships with third parties such as civil society/NGOs/Section 8 and community groups as are permissible under the Companies Act 2013 from time to time.
- In House implementation by MMTC-PAMP – including design and delivery of the project.
- Collaboration with other companies for undertaking projects or programs or CSR activities in such a manner that the CSR Committees of respective companies are in a position to report separately on such projects or programs in accordance with specified governing CSR rules under Companies Act 2013.

The preferred route for implementation will be through partnerships – with civil society organizations, government and others. MMTC-PAMP may also consider participation in larger projects/programs where more than one Corporate / National/ Multi-lateral/ International agencies are involved.

B. GOVERNANCE MECHANISM

MMTC-PAMP will have a multi- tiered governance mechanism.

- Implementation Monitoring Committee (IMC) which will meet once every quarter or as may deemed necessary to approve specific projects, partners and budgets; monitor audit reports and its compliances; review CSR program process and outcomes.
- MMTC-PAMP Executive Board (ExCo) which will approve annual CSR plans & budget and review the progress of the programs once every quarter.
- MMTC-PAMP CSR Board Sub Committee, which will meet twice a year to approve the annual CSR plan/budget, ensure CSR activities being undertaken are as per the Board directives and review the progress of the projects. The quorum for such meetings shall be as per Companies Act 2013.
- The provisions of Section 135 read with relevant rules under Companies Act 2013 shall always supersede and prevail over this policy guidelines.
- The procedural guidelines to be followed at the time of making CSR contributions by the operational team are endorsed as Annexure 3.

C. CONSISTENCY

The provisions of this policy are consistent to the provisions of Companies act 2013[“Act”] as on date in force. In case of any inconsistency or matters not provided herein the provisions of Act shall prevail and overrule this policy, including any amendments and as applicable from time to time.

VI. AUDIT

- All CSR activities and expenses made thereon will be subject to an audit as may be determined by IMC.
- CSR programs governance and quality will be evaluated, monitored and reviewed together with project sustainability as per set protocols vide Annexure 4 or on parameters as determined by IMC from time to time. A third party will do a baseline survey and impact assessment of CSR programs at such frequency as may be determined by IMC.

VII. REVIEW OF POLICY

This CSR policy document will be reviewed from time to time and any changes, if necessary, will be approved by the CSR Board Sub Committee.

VIII. GRIEVANCE REDRESSAL MECHANISM FOR CSR PROCESS

Communities or individuals who are beneficiaries of a project are central to the concept of CSR; Company shall consider their grievances and address at all stages of a policy, plan and execution. The details of the responsible officer are as below:

S. no.	Grievance redressal mechanism	Information
1	Name of responsible officer	
2	Address	
3	Contact details (email and phone)	
4	Functions (list)	

IX. USEFUL LINKS

A copy of this Policy is available on the website of the Company at link: www.mmtcpamp.com/reports

ANNEXURE-1

Schedule VII of Companies Act 2013 as amended till date:

- Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water 4[including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga].
- Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts;
- Measures for the benefit of armed forces veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports
- Contribution to the prime minister's national relief fund or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defense Research and Development Organization (DRDO), 7[Department of Biotechnology (DBT)], Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- Rural development projects
- Slum area development.

Explanation.- For the purposes of this item, the term `slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

- Disaster management, including relief, rehabilitation and reconstruction activities

ANNEXURE-2

INDICATIVE LIST OF ASPECTS TO BE CONSIDERED WHILE ENGAGING WITH OTHER ENTITIES

- Due diligence of the implementing agency would be conducted to check the credentials of the organization.
- The following information from the interested implementing agencies would be sought, as relevant:
 - a. Memorandum/Article of Association or Constitution;
 - b. Registration Certificate;
 - c. Registration Certificate under Section 12A;
 - d. Audited Accounts of last three years;
 - e. IT Exemption Certificate under Section 80G; (Lifetime validity)
 - f. Pan Card;
 - g. IT Exemption Certificate under Section 35(i), if available;
 - h. Acknowledgement of Income Tax Return along with IT Return filed (last three years);
 - i. FCRA Certificate (if any) and latest copy of FCRA Return FC-3, if available;
 - j. Description of the project.
- Ensure that the project/ programme is consistent with list of activities in Schedule VII.
- The team may visit and/or meet the representatives to assess the organization (as required).
- Quarterly reporting on the progress in implementation of the projects/ programmes and utilization of the amounts.
- Reserving the rights, to be exercised at its sole discretion, of stopping the funding at any stage of the project, if the program is not being implemented as per program objectives and goals

ANNEXURE-3

MANDATORY PROCEDURAL GUIDELINES

A. INTRODUCTION

These guidelines lays down the procedures for donating funds or making contributions with relation to various activities as notified under Section 135 of the Companies Act 2013, Companies (Corporate Social Responsibility Policy) Rules 2014 and the projects identified by management for CSR investment.

B. ALLOWABLE ACTIVITIES FOR MAKING DONATIONS AND CONTRIBUTIONS

Activities on which such donations and contributions can be made are listed below:

- Activities including eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation;
- Activities including promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- Activities including promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- Activities including ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry and conservation of natural resources

The details of Project plan approved for the expenses to be incurred for Financial Year 2020-21 have been laid down in Annexure-1.

C. REVIEW AND APPROVAL FOR PROJECT PLAN

Below is the procedure for approval of project plan and onboarding of counterparties for CSR:

- All the projects as part of the CSR implementation, budgeting of CSR expenses and key milestones throughout the year have to approved by Managing Director on an annual basis
- The eligibility of a counterparty including verification of its incorporation to conduct CSR activities shall be confirmed by Company secretary
- The onboarding of the approved counterparties shall be in line with procurement policy of the Company
- The Memorandum of Understanding shall be signed with all counterparties to lay down the project plan along with timelines
- The final approval of onboarding of counterparties for CSR activities shall be given by President; Works
- This will be followed by a creation of an escrow account for spending the earmarked amount exclusively for the listed project

D. PERIODICAL REVIEW OF CSR PROJECTS

A monthly review of CSR projects shall be conducted to verify if the defined milestones as agreed with counterparty are on track and to ensure that amount spent is within the amount budgeted for the year. Under no circumstances, the amount shall be spent on any project other than approved by Managing Directors or Counterparties approved by President Works as laid down in Annexure-1

E. ADMINISTRATIVE OVERHEADS

All the administrative overheads incurred in regard incurring CSR activities shall be approved as part of the Annual Budgeting. However, such expense shall not exceed the maximum limit defined under rule 4(6) of CSR Policy, Rules 2014

F. GUIDELINES FOR MAKING DONATIONS AND CONTRIBUTIONS FOR LISTED ACTIVITIES

Following things shall be kept in mind while ensuring adherence to spent incurred on listed activities:

- No cash donations shall be made and all payments shall be through online transfer/Demand Draft/Cheque;
- All contributions or donations shall be supported by a donation receipt or supporting invoice with details;
- No donations shall be spent through credit card;
- No political donations are allowed or any amount to support any political affiliation;

The details shall be obtained from counterparty for contributions given to them. These details can be in form of external audit report or any other format agreed mutually between MMTC-PAMP and counterparty

G. EXPENSES ON UNLISTED ACTIVITIES

Management is allowing them to spend an amount of INR 25,000 per month as expense to benefit the social and economic welfare of the local region of Nuh District which shall be in line with activities mentioned in Project Plan. Please note that this limit of INR 25,000 does not includes the administrative overheads incurred in relation to CSR activities.

GUIDELINES FOR MAKING DONATIONS AND CONTRIBUTIONS FOR UNLISTED ACTIVITIES:

Following things shall be kept in mind while ensuring adherence to the Allocated Budget as mentioned above:

- No cash donations shall be made and all payments shall be through online transfer/Demand Draft/Cheque;
- All contributions or donations shall be supported by a donation receipt or supporting invoice with details;
- No amount shall be spent on funds already allocated by management for specific listed projects (for instance COVID 19, Skill development center, swajal);

- No donations shall be spent through credit card;
- The liasoning officer shall be present while distribution of such donations or contribution to the recipient
- No political donations are allowed or any amount to support any political affiliation
- Contribution can also include donating food provisions, healthcare provisions or similar items of relevance while ensuring adherence to all guidelines mentioned above
- Such expenses shall be pre-approved by president; works

H. SEPARATION OF ANTI-BRIBERY AND CORRUPTION POLICY

No amount shall be spent on hospitality or gifting under this budget. Such expenses shall continue be reviewed under Anti-Bribery or Corruption Policy.

I. EXCEPTION

Any exception in adherence to these guidelines have to be pre-approved by Chief Risk and Compliance officer.

Annexure-1 to Annexure-3

	Vendor 1	
Project A	Deadline	Budgeted Amount
Activity 1	xx/xx/xx	\$
Activity 2		\$
Activity 3		\$
Activity 4		\$
Activity 5		\$
Activity 6		\$

Annexure-4

PROJECTS EXISTENCE, EVALUATION AND SUSTAINABILITY REPORTING

KEY MATRICES FOR IMPLEMENTATION MONITORING COMMITTEE

A. FINANCIAL DETAILS

S. no.	Details	Three preceding financial years (Rs)			
		First year [*]	Second year [*]	Third year [*]	Cumulative
1	Net worth				
2	Turnover				
3	Net profits				

B. CSR ALLOCATION

Particulars	In Rs	Percentage
2% of net profits		100%
Amount spent		
Amount unspent*		
Allocations beyond 2% of net profits (if any)		
Expenditure beyond 2% (if any)		
Balance amount		

C. NATURE OF CSR ALLOCATIONS

Philanthropic activities correspond to donations given by companies in the form of money, books to libraries, clothes to orphanages and alike. Infrastructural development entails construction of roads, community centers, tube wells, providing technical assistance and infrastructure facilities in electricity generation/ distribution, adding to already existing infrastructure, for example, toilets in government schools, green parks. Initiatives to empower communities include skill development, vocational training, livelihood issues, training of rural sportsmen, SHG formations, capacity building of farmers. Environmental protection may include projects and initiatives aimed at conserving the environment.

C.1 PHILANTHROPIC- DONATION IN CASH OR KIND

S. no.	Donated to	Amount (in Rs)	Amount in percentage
1			
2			

C.2 INFRASTRUCTURAL

S. no.	Area of spending	Amount (in Rs)	Amount in percentage
1			
2			

C.3 COMMUNITY DEVELOPMENT

S. no.	Area of spending	Amount (in Rs)	Amount in percentage
1			
2			

C.4 ENVIRONMENT PROTECTION

S. no.	Area of spending	Amount (in Rs)	Amount in percentage
1			
2			

D. CSR BOARD SUB-COMMITTEE COMPOSITION

S. no.	Name	Designation and affiliation	Contact (email and phone)
1		(Chair)	
2		(Director)	
3		(Director)	

E. CSR COMMITTEE MEETING- INSTITUTIONAL

Meeting no.	Date (dd/mm/yyyy)	Members present	Agenda	Outcome
1				
2				
3				

F. CSR COMMITTEE MEETING-PROJECT APPROVAL

S. no.	Name of project	Budget approved (in Rs)	Date (dd/mm/yyyy)	Project/ programme timeline (from the date of budget approval)	Geographical area (village, city or town/district/state)
1					
2					
3					

G. DURATION, REVIEW AND EXTENSION OF PROJECTS

S. no.	Name of project	Timeline— short/ long term	Brief description*	Key reasons of extension/non-extension of project	Remarks
1					
2					
3					

H. CSR COMMITTEE-PROJECT SITE VIEW

S. no.	Project	Number of visits	Date of visit (dd/mm/yyyy)	Key observations
1				
2				

I. CSR ASSESMENT

1. STAKEHOLDER ENGAGEMENT

S. no.	Project	Needs-based assessment (Yes/no)	Number of community meetings	Number of focused group discussions	Other tools (specify)
1					
2					
3					
4					
5					

2. NEED BASE ASSESMENT

S. no.	Project	Target community/ communities	Issues identified	Issues prioritized
1				
2				

J. IMPLEMENTING AND MONITORING MECHANISM

S. no.	Project	Name of implementing organization	Amount granted	Name of monitoring agency	Frequency (quarterly/ monthly/half yearly/ annually)	Due diligence (yes/no)
1						
2						

K. PROJECT REVIEW

S. no.	Project name	Number of reviews	Date of latest review meet (dd/mm/yyyy)	Key observations*
1				
2				

L. PROJECT OBJECTIVES ACHIEVED

S. no.	Project name	Objective	Objective achieved (yes/no/maybe)	Key performance indicators*
1				
2				

M. OUTCOME AND PROJECT SUSTAINABILITY

S. no.	Project	Outcomes	Key features of project sustainability
1			
2			
3			
4			
5			

N. SUCCESS STORIES AND KEY LEARNINGS

S. No.	Success Stories	Key Learnings
1		
2		
3		
4		
5		

Approved by Signature:

Approved by Name:

Date of Approval:

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