



**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 significant contribution 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 will focus on:

Project Heads	Intervention areas
PROMOTING EDUCATION & SKILL DEVELOPMENT	Promoting education, setting up and running educational institutions and hostels; Setting up and running mid-day meal kitchens; Training of teachers and headmasters; Improving quality of education in existing schools; Augmenting and supporting infrastructure in educational institutions; Offering scholarships and financial assistance to needy and meritorious students; 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, 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; monetary contributions to institutions contributing to similar objectives; Setting up and running clinics and hospitals; Running mobile medical vans and ambulances; Organizing health camps.
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.
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; Revival of water bodies (through rainwater harvesting), Developing water harvesting structures and irrigation facilities.
PROMOTING GENDER EQUALITY AND WOMEN EMPOWERMENT	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.
DISASTER MANAGEMENT	Managing and responding to disaster relief, rehabilitation and reconstruction activities.
OTHERS	Other contributions may also include promoting rural sports, funds prescribed and recognized under CSR, promoting research activities in the field of education, health and other permissible activities as may be approved from time to time

B. UNDERTAKING CSR ACTIVITIES

The Board of Directors shall ensure that MMTC-PAMP spends, in every financial year, at least two per cent of the average net profits of the company made during the three immediately preceding financial years. For the purposes of ascertaining the CSR Budget “average net profit” shall be calculated in accordance with the provisions of section 198 of the Companies Act, 2013.

MMTC-PAMP’s will undertake its CSR activities as per the duly approved Annual CSR Plan/activities in accordance to the provisions of Companies act 2013. While engaging with partners, Company will evaluate the credentials of the implementing entity and seek relevant documents, information and details as per Annexure 1.

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 CSR EFFORTS

MMTC-PAMP’s focus areas for community development projects will be in the periphery of MMTC-PAMP’s local areas of operations, as far as possible. 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 from time to time.

IV. RESPONSIBILITY OF THE CSR 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.
- Monitor the quality of programmes undertaken by the company at agreed periods and advise the company accordingly.

- Any other responsibility as may be assigned from time to time by the Board.

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 which shall include monitoring and reporting process as below:

- **Implementation & Monitoring Committee(“IMC”):**
 - IMC will be steered by Managing director and comprise of employees nominated by him, which will meet once every quarter or as may deemed necessary to consider specific projects, partners and budgets; monitor audit reports and its compliances; review CSR programs, processes and outcomes.
 - The IMC will assign the task of implementation of the CSR Plan within specified budgets and timeframes to such persons or bodies as it may deem fit.
 - The IMC will make sure that the signed agreements with the implementation agency, wherever applicable, has been executed which shall provide for the monitoring and reporting mechanism.
 - The persons/bodies to which the implementation is assigned for every project will carry out such CSR Programmes as determined by the IMC within the specified budgets and timeframes and report back to the IMC on the progress thereon at such frequency as the IMC may direct.
 - The IMC shall review the implementation of the CSR Programmes once a quarter and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Programmes in accordance with this Policy.
 - Once every six months the IMC will provide a status update to the CSR Committee on the progress of implementation of the approved CSR Programmes carried out during the six months period.
 - To ensure that the funds are utilized prudently and for the intended purpose, the funds shall be released in a phased manner, upon full satisfaction of the utilization of funds previously given.
- **MMTC-PAMP Corporate Social Responsibility Committee [“CSR Committee”]:**
 - Every year, the CSR Committee will place for the Board's approval, a CSR Plan delineating the CSR Programmes to be carried out during the financial year and the specified budgets

thereof. The plan will include resource requirements, implementation agency if any and allocation across interventions and locations amongst other relevant details.

- ii. The Board will consider and approve the CSR Plan with any modification that may be deemed necessary.
- iii. CSR Committee will meet twice a year and review the progress of the projects including performance of responsibilities as are prescribed under the provisions of Companies Act 2013 on case to case basis.
- iv. The quorum for such meetings shall be as per the provisions of Companies Act 2013.
- v. It shall be the responsibility of the CSR Committee to review reports as received from IMC and keep the Board apprised of the status of implementation of the same.

C. OTHER GUIDELINES

The procedural guidelines to be followed at the time of making/disbursing of CSR funds by MMTC-PAMP's finance and operational team are endorsed as **Annexure 2**.

D. 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 AND EVALUATION

- All CSR activities and expenses made thereon will be subject to an audit as may be determined by IMC.
- 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 formulated by the CSR Committee and to recommend the same for the approval of the Board.

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	Mr. Vikas Singh
2	Address	
3	Contact details (email and phone)	011-49684200
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

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 as prescribed under CSR policy.
- Company Representatives 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-2

OTHER GUIDELINES

A. INTRODUCTION

These guidelines lay down the procedures for disbursing 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 for CSR purposes.

B. REVIEW AND APPROVAL FOR PROJECT PLAN

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

- 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 nodal officer for each project shall be responsible for the execution and signing of the Memorandum of Understanding or the Agreement 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 IMC or anyone nominated by the IMC.

C. PERIODICAL REVIEW OF CSR PROJECTS

A 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 the IMC.

D. ADMINISTRATIVE OVERHEADS

All the administrative overheads incurred in regard incurring CSR activities shall not exceed the maximum limit defined under rule 4(6) of CSR Policy, Rules 2014

E. GUIDELINES FOR RELEASING FUNDS AND CONTRIBUTIONS FOR LISTED ACTIVITIES

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

- No cash payments shall be made and all payments shall be through online transfer/Demand Draft/Cheque;

- All contributions or payments shall be supported by a donation receipt or supporting invoice with details;
- No payments or contributions 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

F. 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.

Approved by Signature:

Approved by Name:

Date of Approval:

Document Number: POL/CSR/001

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