

# MONTRAN INDIA POLICY

## *Corporate Social Responsibility*

### Purpose

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In terms of the Companies Act, 2013, every company must have a Corporate Social Responsibility (CSR) Committee of the Board of Directors that shall help the Company to frame, monitor and execute the CSR activities of the Company under its CSR scope.

### Introduction

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Montran India's Corporate Social Responsibility (CSR) program is committed to improve the quality of life of the communities. It aspires to build a social conscience profile in the community in conformity with the company's DNA and core values.

Montran India's CSR program shall align with the Corporate's CSR objectives.

### Scope

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This policy applies to Montran's India location and shall ensure compliance to all regulations in this region. This policy shall be operative to the extent of the CSR provisions contained in the Companies Act 2013, the Companies (Corporate Social Responsibility Policy) Rules, 2014 read with Schedule VII and amendments thereof, applicable from time to time.

### Focus Areas

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The company's CSR activities shall be focused on the following areas to create maximum impact and greater visibility. The Board recommends that the Company may consider the initiatives listed below.

- Financial Education & Inclusion: Leverage programs to introduce and impart knowledge on Financial education and Financial inclusivity in rural geographies
- Contribution to the government's relief and charity funds

The following parameters are observed while considering CSR activities of the Company:

- Social impact
- Employee Engagement
- Duration of the project / activity

## Process of Implementation

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1. CSR programs may be implemented through one or more of the following modes (NGOs, Local partners, Gram Panchayat, other Corporates, industry associations, government bodies), and for specialized projects suitable external agencies may be hired, if required.
2. The preferable process of project or activity implementation shall be as follows:
  - ⇒ Need Assessment
  - ⇒ Baseline survey/ Feasibility study/ Detailed Project Report
  - ⇒ Project formulation and design
  - ⇒ Project Execution within approved time-frame and cost-frames
  - ⇒ Project closure
  - ⇒ Evaluation/ Impact Assessment
  - ⇒ Documentation of practices, processes and impacts

## Undertaking CSR Activities

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Montran India shall undertake its CSR activities (projects / programs / other initiatives) as approved by the CSR Committee either directly or through any other eligible entity as approved by the CSR Committee.

The surplus arising out of the CSR activities shall not form part of the business profit of the Company. Such surplus shall be spent towards its CSR activities in accordance with this policy.

The CSR committee and the Board of Directors of the Company shall monitor the identification and implementation of CSR programs, as required under the applicable law.

## Impact Assessment

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Impact assessment shall be undertaken by the Company or by recipient or by implementing agency as required by and in the manner set out under Applicable Law, and the impact assessment report(s) shall be placed before the CSR Committee and the Board, and shall be disclosed as legally required.

## Governance

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Montran India's CSR Policy has been formulated in consonance with Section 135 of the Companies Act, 2013 read with the CSR Rules notified by the Ministry of Corporate Affairs, Government of India.

This Policy shall apply to all CSR projects / programs undertaken by the Company in India as per the Companies Act, 2013.

## CSR Committee

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In accordance with the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR shall be appointed by the Board of Directors of the Company and shall consist of at least two or more Directors.

Accordingly, the constitution of CSR Committee for Montran India is as follows:

NAME	DESIGNATION IN COMMITTEE
Parag Desai	Chairperson
Nitin Nagarkatte	Member
Sarika Vaze	Member
Manjula Rao	Member

The CSR committee shall -

- Formulate and recommend to the Board of Directors, a CSR Policy which shall indicate the activities to be undertaken by the company or as amended from time to time basis;
- Decide the CSR activities to be taken up by the Company in accordance with this Policy;
- Recommend the amount of expenditure to be incurred on the activities to be undertaken under the CSR policy;
- Oversee and monitor the progress of the initiatives rolled out under this Policy;
- Submit a report, to the Board on all CSR activities undertaken during the financial year; and
- Meet at least once in a financial year.

## Disclosure of the Policy

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The CSR policy recommended by the CSR Committee and approved by the Board shall be displayed on the Company's website and shall be disclosed in the Board's report as well.

## Amount of Expenditure to be made on CSR activities (Contribution)

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In terms of Section 135 of the Companies Act, 2013, read with Companies (Corporate Social Responsibility Policy) Rules 2014 the Board or Committee, shall ensure that, the Company spends, in every Financial Year, at least 2% of the Average Net Profits of the Company made during the 3 (Three) immediately preceding Financial Year.

For the purposes of this section "Average Net Profits" have been calculated in accordance with the provisions of Section 198 of the Companies Act, 2013.

## Monitoring

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The CSR Committee shall monitor the operation, working, quality and spending under CSR Policy. It should further define the parameters and should observe them for effective discharge of the social responsibility of the company.

The committee shall ensure that the CSR activities do not include the activities undertaken in pursuance of normal course of business of the company.

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

The internal monitoring mechanism shall ensure the following:

- ☛ Defined Process Owners for each process, program, and/or different levels within each program
- ☛ Periodic reporting to leadership on the amount spent and activity undertaken
- ☛ Impact measurement, including social upliftment and benefits to the community
- ☛ Report consolidation and communication to the CSR Committee of the Board

## Reporting

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The CSR committee shall maintain an annual report containing relevant information as specified in the Annexure to the CSR rules. This report shall be reported by the Board of Directors of the company along the Board's Report, which shall form a part of the Financial Statement.

The performance of the Company's CSR activities shall be monitored based on its achievement of annual targets and the utilization of its annual budgets for activities planned and the targets set for each year.

