

MCPI Private Limited

**(Formerly MCC PTA India Corp. Private Limited,
Materials Chemicals and Performance Intermediaries Private Limited)**

Policy Guidelines for Corporate Social Responsibility

Approved and adopted vide Board Resolution dated July 11, 2014
Revised vide Board Resolution dated July 19, 2017



Certified as true :

Debi Prasad Patra
Whole-time Director

Policy Guidelines for Corporate Social Responsibility (CSR)

Philosophy	<p>As a responsible corporate citizen and as part of its endeavour towards inclusive development of society and community at large, MCPI Private Limited (Formerly MCC PTA India Corp. Private Limited, Materials Chemicals and Performance Intermediaries Private Limited) (MCPI) recognizes the significance of the philosophy and the concept of CSR, which will add value to the operations and contribute towards the long term sustainability of the business and eventually, enhance the interests of the stakeholders and the society.</p>
Objective	<p>In pursuing the philosophy aforesaid, MCPI will put efforts to make contribution towards society and nature.</p> <p>This will enable MCPI to promote</p> <ul style="list-style-type: none">• public purposes• social responsibilities• inclusive development of community and society• environmental sustainability and ecological balance <p>The CSR initiatives, by the Company shall give preference to the local areas (viz. Haldia and Kolkata), which, however, will not directly relate to (i) the business of the Company and (ii) welfare of its employees.</p>

Scope	Purpose	Activity	Events / Areas / Programs / Projects
Contribution / Promotion / Facilitation	• Contributions for public purpose	• Promoting gender equality / Reducing inequalities among different social groups etc.	Promoting gender equality and empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centre and such other facilities for senior citizens and measures for reducing inequalities faced by the socially and economically backward groups
		• Protection / restoration of National Heritage / promotion of art and culture etc.	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 arts and handicrafts
	• Contributions for social purpose	• Enhancement of Education / Knowledge / Academics / Skill Building / Training	Sponsor under privileged and / or distressed students with brilliance for Higher Studies or for training and provide Scholarship for those students with distinct brilliance
			Sponsor Educational Institution / Vocational Training Institution promoting skill building activities / education / special education for distressed people / children / women / elderly and the differently able and livelihood enhancement projects etc.
			Promoting / participating in Consumer Awareness and Education Programs, Consumer grievance redressal mechanism etc.
			Promoting research and studies having national relevance
			Contributing to rural development projects
			Educating the masses & promotion of Road Safety awareness in all facets of road usage

			Safety traffic engineering and awareness
		• Facilitating Sports & Cultural activities	Sponsor Sports & Games of national, state level, regional significance, Paralympic and Olympic sports
		• Facilitating Health & Hygiene initiatives / eradicating hunger / malnutrition / poverty, provision of sanitation facilities, etc.	Support to Eye Camp, Pulse Polio campaign. Health Check up & Blood Donation camp organized through relevant agencies / authorities etc.
			Facilitating promotion / awareness of Health & Hygiene
			Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water
			Supplementing Government schemes like mid-day meals etc.
			Medical and legal aid / treatment to accident victims, support to trauma care centers etc.
		• Facilitating Environment Protection and promoting Sustainable Development	Plantation & Forestation initiatives and / or other relevant identified programs / projects including projects initiated by / through relevant forums / platforms etc for maintaining ecological balance, wildlife protection, conservation of natural resources and maintaining quality of soil, air and water
	• Contributions for charitable purpose	• Support to combat disasters / natural calamities etc.	Victims of Flood, Earthquake, Cyclone and other National Calamities, providing disaster reliefs etc.
		• Measures for benefit of armed forces	Measures for benefit of armed forces veterans, war widows and their dependents
		• Reducing inequalities faced by socially and economically backward groups	Through renowned / prescribed organization(s) as may be contemplated / indicated in the applicable regulations / rules relating to CSR from time to time, having an established track record of at least three years in the related field

		/ under privileged sections of society	Support to individual / community who achieved distinction at National level but now in distress
			Medical amenities like Ambulance, X-ray machine or any such medical kits to entities / organisations pursuant to the contemplation expressed in applicable rules / regulations relating to CSR from time to time
			Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, Scheduled Tribes, other backward classes, minorities and women

Sanctioning Authority	<p>Corporate Social Responsibility (CSR) Committee as constituted by the Board of Directors of the Company shall be the overall governing and approval authority with respect to CSR activities.</p> <p>Managing Director / Whole-time Director, however, would be authorised, as and when required, for sanctioning amount for any specific activity within the overall Ceiling Limit / Budget as may be applicable and approved by the CSR Committee.</p>
Ceiling Limit	<p>For each financial year, 2% of the average net profits (as defined in the Companies Act, 2013 and the applicable rules thereunder) made during three immediately preceding financial years or such higher amount as may be resolved by the Board of Directors, as applicable.</p> <p>In case of no such profit in any financial year, CSR activities may be carried out in that year, subject to maximum of Rs.10 Million, or such amount as may be approved by the Board of Directors.</p>

Implementation Authority / Monitoring Authority / Implementation Procedure	<p>CSR Committee as may be constituted from time to time.</p> <p>The modalities for execution of the CSR activities / projects / programs, implementation schedule / monitoring process of projects / programs shall be prescribed and reviewed by CSR Committee from time to time.</p>
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The Policy Guidelines of CSR activities entail the following **basic principles and core elements** and it is the intention of the Company to pursue and preserve the same all through:

1. Care for all Stakeholders including interaction with all Stakeholders, sharing information relating to inherent risks and adopting countermeasures thereto
2. Ethical functioning through promotion of transparency, good governance practices
3. Prevention of employment of child labour
4. Respect for Human Rights
5. Respect for Environment
6. Activities for Social Development including education, skill building, health, cultural and social welfare particularly targeting at disadvantaged sections of society.

General Guidelines:

1. The above CSR programs and / or activities are illustrative and not exhaustive. Further programs and / or activities can be identified through review, evaluation and assessment by the CSR Committee as and when required, pursuant to the provisions of the Companies Act, 2013 and the Corporate Social Responsibility Rules, 2014, as amended, from time to time. The CSR programs and / or the activities so selected / identified may be carried out by the Company through its officials, employees, representatives, any relevant forum / platform / organization etc., as may be decided by the CSR Committee.

2. The Company may conduct its CSR activity through Trusts, Societies or Companies formed for charitable purposes, operating in India and having established track record of at least three years in carrying on activities in related areas.
3. The Company can also collaborate or pool resources with other companies to undertake CSR activities and any expenditure incurred on these collaborative efforts would qualify for computing statutory CSR spending.
4. Any of the Stakeholders can interact, communicate with / to the CSR Committee Members forwarding their recommendations / suggestions, for consideration by the CSR Committee.
5. Any surplus arising out of CSR projects or programs or activities shall not form part of the business profit of the Company.
6. The above referred illustrative activities, events and / or any such other activity / event as may be identified by the CSR Committee would be project / program based, to the extent possible, in terms of the contemplation expressed in the Companies Act, 2013 and the Corporate Social Responsibility Rules, 2014, instead of being one-off events, donations etc.
7. Employees, in general, are encouraged to align with and enhance Company's CSR efforts by volunteering their services / participation to any of the identified CSR projects / programs, so as to enable the Company to proceed with a comprehensive and 'inclusive' approach, while pursuing its CSR activities.
8. The CSR Policy as aforesaid may be modified / amended as may be required from time to time.

CSR COMMITTEE OF MCPI PRIVATE LIMITED

(Reconstituted with effect from August 22, 2022)

Mr. Debi Prasad Patra (Whole-time Director)	- Member (designated as 'Responsible Director')
Mr. Sekhar Krishnan (Director)	- Member
Mr. Goutam Kar (Vice President-Strategic Initiative)	- Secretary
Mr. Ananta Charan Mishra (Executive Vice President – Operations)	- Permanent Invitee
Ms. Sampa Bhowmick (Senior General Manager-HR)	- Permanent Invitee
Mr. Kaushik Dutta (Senior General Manager – Corporate Planning)	- Permanent Invitee
Ms. Paheli Choraria (Chief Manager – Corporate Affairs & Company Secretary)	- Permanent Invitee
Mr. Rajat Dey (Advisor- Human Resource- Plant)	- Permanent Invitee / Activity In-charge