

Muthoot Fincorp LTD

CSR Policy

September 2014

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1. CONTEXTUAL FRAMEWORK

INTRODUCTION TO MUTHOOT FINCORP LTD.

1.1.1 Muthoot Fincorp Ltd. (MFL) is the flagship of Muthoot Pappachan Group (MPG), which has been in the forefront of innovation throughout its journey of more than 12 decades. MFL with strong fundamentals, is a proactive Non-Banking Financial Company (NBFC) registered with the Reserve Bank of India. MFL is a mass provider of finance in the form of gold loan and other loans with over 3800 branches pan India and an average of 45,000 customers a day.

1.2. POLICY APPLICABILITY

1.2.1 This policy, which reflects the company's philosophy and mission is designed to portray its commitment to be a responsible, corporate citizen and presents the strategies and methods for undertaking social programs for the well-being and sustainable development of the local community in which it operates.

1.2.2. This policy applies to all CSR initiatives and activities taken up at the various work centers and locations of MFL for the benefit of various segments of the society, with the emphasis on the under privileged.

Each CSR activity of the MFL is channelized through the Muthoot Pappachan Foundation

1.3. FOUNDATION'S OBJECTIVES AND HEEL FRAMEWORK

1.3.1. Muthoot Pappachan Foundation (MPF) is a Public Charitable Trust formed in the year 2003 as the CSR arm of the MPG to facilitate CSR activities for the entire Group entities.

Planning and implementing various CSR activities towards the set objectives of the organization and facilitating the CSR programmes of various group companies of MPG, is the major responsibility of MPF.

1.3.2 The entire range of CSR activities implemented by the selected group entities for initial phase will be streamlined and facilitated through Muthoot Pappachan Foundation. The CSR programs of Muthoot Pappachan Foundation are bound by the theme HEEL: Health, Education, Environment, Livelihood. Each entity will be leading its own CSR initiative within the HEEL framework, specifically involving their staff and customers.

1.3.3. Aligning with vision of the company, MFL , will continue increasing value creation in the community in which it operates, through its services and CSR initiatives planned and implemented by MPF, so as to stimulate well-being for the community, in fulfillment of its role as a responsible, corporate citizen.

- 1.3.4 The objective of the MFL CSR Policy is to:
- Build a framework of CSR activities with a philanthropic approach in line with business unit objectives, which also benefits the organization at large;
 - Shape sustainability for the organization by 'Engaging the Community.'
 - Build a corporate brand through CSR
 - For other stakeholders make it "an integral part of the company's DNA, so much so that it has to be an organic part of the business".
- 1.3.3. The over-arching framework of HEEL, which will not only guarantee consistency among the selected entities but also full compliance with the CSR requirements mandated by the New Companies Act 2013.

HEEL will allow the MPF to remain focused on selected issues while adopting a systematic and professional approach to its work. Under the effigy of MPF, each entity will be leading its own CSR initiative within the HEEL framework, specifically involving their staff and customers.

2. RESOURCES

2.1. BUDGET AND FUND ALLOCATION

- 2.1.1. In order to achieve its CSR objectives through implementation of CSR programs by the MPF, MFL will allocate 2% of the average Profit Before Tax (PBT) of the previous 3 years to create its Annual CSR Budget.

Consequently, doing so MFL will also comply with the new law obliging mandatory CSR as described in section 135 of the Companies Act 2013.

3. PLANNING

Identification of focus areas and strategic initiatives

The CSR efforts of MFL will be facilitated through MPF a continuous and effective method. The CSR programs are bound by the theme- HEEL and are identified as follows:

- Health: Life Blood Directory, Smile Please, Outreach camps, Treatment Support
- Education: Financial Literacy, Community Education, Scholarships
- Environment: Green Strategy
- Livelihood: Sports, Streejyothi, Housing assistance etc
- Any other activity as permitted under Schedule VII (Section 135) of the Companies Act 2013.

4. IMPLEMENTATION

- 4.1 The above described CSR activities will be implemented on behalf of MFL by MPF in collaboration with other non-profit organisations.
- 4.2 The duration of each program will be related to the nature of the program and its impact.

- 4.3 CSR activities involving substantial financial commitment, undertaken for periods for or above 3 years will be considered as “flagship programs” and will have greater significance.
- 4.4 MPF will ensure that the CSR programs, financed by MFL will be executed in the areas where the company has business presence.
- 4.5 The programs will be implemented by MPF in collaboration with specialised organisations wherever required in consultation with MFL.
- 4.6 The implementation phase is based on the following steps:
- 4.6.1. **Map existing eco system:** thoroughly evaluating the existing scenario in which the company operates. This step is crucial in order to assess the existing potential and find relevant partners to collaborate with.
- 4.6.2. **Create:** designing programs, selecting partners.
- 4.6.3. **Enable:** commencing collaboration with the selected actors, invest the resources needed to shift from the planning to the action phase.
- 4.7 Powers for approval
- 4.7.1. The CSR Budget for each financial year is to be approved by the board at the beginning of each financial year with due recommendations of the CSR Committee.
- 4.7.2 For meeting the requirements arising out of immediate & urgent situations, MFL CSR Committee is authorised to approve proposals within the overall budget limits. The approvals given by the CSR Committee as stated above shall be reported to the board for ratification.
- 4.8 Criterion for identifying executing organisations:
- 4.8.1 MPF on behalf of MFL will identify external, executing organisations that will implement the CSR programs. Each executing organisation (NGOs/voluntary organisations) needs to fulfil the following requirements:
- has been in existence for a minimum of 3 years from date of registration;
 - is registered under Trust/Society/Section 8 Company;
 - possesses a valid Income Tax Exemption Certificate;
 - the antecedents of the NGO/Organisation are verifiable/subject to confirmation;
 - has sufficient infrastructure facilities including office, e-mail id, necessary resources to imply the projects etc.
 - has prior experience in the relevant field;
 - located in the area of planned activities with local knowledge;

- has articulated shared vision/purpose beyond the registration documents;
- 4.9 After the approval of the CSR budget, for partnership programmes, MPF and the concerned NGO/Organisation will be required to enter into a formal written agreement.

5. MONITORING AND FEEDBACK

- 5.1. In order to ensure effective implementation of the CSR programs, a monitoring mechanism will be put in the place. The progress of the programs will be communicated and reported to MPF on monthly basis. Additionally, an annual CSR report is also to be submitted by MPF.
- 5.2 The Foundation will conduct impact studies on a regular basis, especially on the “flagship programs”. For conducting such Impact Studies, MPF can engage suitable consultants if required in consultation with MFL.
- 5.3 The foundation will communicate with the beneficiaries in order to obtain feedback about the programs.

6. GOVERNANCE

The implementation of the CSR activities will be monitored by the CSR Committee of the Board.

6.1 The Fincorp Board of Directors is committed to assume the following role:

- Approving the CSR policy recommended by the CSR committee;
- Disclosing the CSR policy contents in each corresponding Board Report;
- Making the CSR Policy public on company website;
- Approving the annual CSR Budget recommended by the CSR Committee.

6.2 CSR COMMITTEE

The MFL CSR Committee will be responsible to

- formulate the CSR strategy and activities,
 - recommend the annual budget based on MFL’s profit before tax in the previous 3 consecutive years and
 - regularly monitor the MFL’s CSR policy.
- 6.3 MFL CSR Committee consists of the following 4 Directors
Mr. Kamalasanan Nair (Independent Director & Chairman)
Mr. Thomas John Muthoot
Mr. Thomas George Muthoot
Mr. Thomas Muthoot