



SHIRPUR GOLD REFINERY LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. Introduction and Objectives

Shirpur Gold Refinery Limited (SGRL), a part of Esselgroup, is the first and the largest gold and silver refinery in India with installed capacity to refine 217 MT p.a. of gold and silver respectively. It has set up a green field project for refining of gold and silver with technical capacity of achieving fineness of 999.9 parts per thousand. The Company has production lines for gold and silver bars, minting of gold and silver coins and gold jewellery.

At SGRL, we believe that a business cannot succeed in a society that fails and therefore it is imperative for business houses to invest in the future by taking part in social building activities. With this objective, the Board of SGRL had on 5th February, 2015 approved a Corporate Social Responsibility Policy which was unified at Essel Group level. The said policy is in line with the requirements of Section 135 of the Companies Act, 2013.

2. Corporate Social Responsibility (CSR) Philosophy

Our approach to CSR is built on creating sustainable programs that actively contribute and support the social and economic development of the communities in which we operate. CSR for SGRL is beyond its own immediate business interests to make positive difference. At SGRL we are:

- 1) Committed to promoting the principle of inclusive growth and equitable development.

- 2) Committed to carry out our business activities respecting the cultures and practices of each region we operate in and proactively engage in activities that contribute to society as a good corporate citizen.
- 3) Committed to invest in our community development by empowering women and children (especially girl child) by providing respective skills and education.
- 4) Committed to engage and work actively in areas of promoting education and providing preventive healthcare.

3. Scope

This Policy covers proposed CSR activities to be undertaken by the Company and examining their alignment with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities.

Based on the 2 % of the average net profits calculated for the last 3 financial years, the Company is not required to spend any amount on CSR activities during the FY 2014-15. However, subject to applicability of provisions of the act, the Company shall in future implement it's CSR activities in various sectors which may include but not limited to Healthcare, Education, Rural Development, Environment protection, Go green initiatives or Any other area as may be prescribed by Schedule VII amended from time to time.

4. Exclusion from CSR

- 4.1 The CSR Rules prohibit the CSR projects and programs that are implemented by the Company for benefit of the employees of the Company and their families.
- 4.2 The CSR activities implemented outside India also fall outside the purview of the Rules and hence CSR expenditure on such activities will not be considered for inclusion in the CSR Report.
- 4.3 Any amount directly or indirectly contributed towards any political party under Section 182 of the Act shall not be considered as CSR Spend.
- 4.4 Activities that are undertaken by the Company in pursuance of its normal course of business will not be considered as CSR activities.

5. CSR Committee:

SGRL shall constitute a Corporate Social Responsibility Committee of the Board (“CSR Committee”) consisting of at least one Independent Director. CSR Committee shall

1. Formulate and recommend to the Board, a CSR Policy and activities to be taken by the Company as per Schedule VII
2. Draft a CSR plan and recommend the amount of expenditure to be incurred on the activities.
3. Monitor and review various projects and activities undertaken by SGRL in compliance with, and under this, Policy and shall submit its periodical report to the Board of Directors for appropriate disclosures in the Directors Report.

6. CSR Project Management

6.1 Implementation:

Within the defined ambit of the identified thrust area CSR programs within SGRL would be undertaken to the best possible extent. Project activities identified under CSR would be implemented through a registered trust or a society registered or a company established by the SGRL or its holding or subsidiary or associates within Essel Group viz. ‘Zee Foundation’/‘Taleem Foundation’ or in collaboration with trusts, NGOs, academic institutes, self-help groups, autonomous institutions and professional consultancy organizations etc.

6.2 Collaboration

The Company may form trusts on its own to carry out and to administer CSR activities in accordance with the CSR Rules. The Company may also collaborate its CSR activities with other Essel Affiliates or its subsidiaries or any other Company as may be eligible and approved by the CSR Committee vis-à-vis the Board of Directors and towards this effort, the Company may jointly along with other Essel Affiliates or its subsidiaries or any other Company form Trusts to administer the CSR activities.

SGRL is to undertake multiple initiatives focusing on bringing about inclusive social development which contributes towards realization of its corporate social responsibility vision. SGRL’s CSR strategy is focused on four broad areas of activity that addresses the

social problems and needs of multiple target groups of the society in a holistic and sustainable manner mainly viz. Promoting Education, Preventive Health Care, Women's Empowerment and Sports.

Education: Our primary focus is based on the belief that every child has the ability to learn, and excel in any field of their interest. Opportunities coupled with access to quality academic and professional education among deserving, vulnerable and meritorious students can shape their successful careers and future. SGRL in collaboration with local communities and partner organization(s) shall focus to address literacy and gender equality in education.

Health Care: The Company proposes to partner with NGOs and other self-help groups to promote awareness, enable access and affordability in availing both preventive and curative health care services.

Women's Empowerment: Status of women in the society or country at large is reflected in the Progress and development that the society or a nation has achieved. SGRL shall support activities contributing to gender equality, socio-economic empowerment of the women and bring awareness programmes on anti-social issues.

Sports: Sports today is an integral part of holistic development of the human personality and excellence in sports is also associated with national prestige and morale. Therefore, SGRL shall support talent in youth.

7. CSR Budget

For achieving its CSR vision through implementation of meaningful and sustainable CSR programs, SGRL will allocate requisite sum as its ~~annual~~ CSR budget as may be decided by its CSR committee and any unspent/ unutilized CSR allocation of a particular year shall be carried forward and spent in the following year(s).

8. CSR Project Management

Projects activities identified under CSR would be implemented directly or through associates of Essel Group or by way of collaboration with NGO's, Trusts or any professional agency. The CSR Committee shall review and monitor the progress of CSR activities undertaken by

SGRL, in compliance with and prepare a periodical report on progress of CSR activities for submission to the Board.

9. Governance Structure

At the Board level, the CSR governance structure at SGRL will be headed by the CSR Committee which will be responsible for formulating and implementation of CSR projects and put in place monitoring mechanism to track project progress.

10. General

Any or all provisions of this CSR policy would be subjected to revision / amendment as per any guidelines issued by the Government from time to time and / or as recommended by the CSR Committee and approved by the Board of Directors of SGRL.

The company reserves the right to modify, cancel, add or amend rules/ provisions specified in the CSR policy.

11. Approval of the Corporate Social Responsibility Policy

This Policy is prepared by the CSR Committee and approved and adopted by the Board at its meeting held on 5th February, 2015.

12. Dissemination

The content of this Policy and CSR projects undertaken under this Policy shall be disclosed from time to time in the Company's Annual Financial Statements, Board's Report and on the Company's website.
