

## **POLITICAL AND CHARITABLE CONTRIBUTION POLICY**

**Tirupati Medicare Ltd.**

Nahan Road, Paonta Sahib, Dist. Sirmour,

**T** +91 98167 00121 / 22 **E** [info@tirupatigroup.co.in](mailto:info@tirupatigroup.co.in) **W** [www.tirupatigroup.co.in](http://www.tirupatigroup.co.in)

**Registered Office :**

D-14, IInd Floor, Preet Vihar, New Delhi - 110 092, India

CIN : U041233DL2805PLC139667

## TABLE OF CONTENTS

1. Objective .....	3
2. Definitions .....	3
3. Scope.....	4
4. Political Contribution .....	4
5. Charitable Donations.....	4
6. Retention of Documents.....	6
7. Amendment.....	6

## 1. Objective

This policy establishes the responsibilities of TML while considering political and charitable contributions. We employ individuals of different political persuasions, and we believe in maintaining an environment in which everyone feels respected. TML believes in supporting and enriching the overall environment and communities in which it operates, and that charitable donations are an integral part of its corporate social responsibility.

## 2. Definitions

**“Company or “TML” means** Tirupati Medicare Limited and its subsidiaries.

**“Charitable Donation” or “Donation” means** a donation which is voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause for the purposes of charity and for which no service or payment in return is expected. Charitable Donations made in accordance with this policy shall be exclusive of and shall refer to donations over and above any contributions made under the Corporate Social Responsibility Policy as per the requirements of Section 135, Companies Act, 2013.

**“Employee” means** an individual on the employee pay roll of TML (whether in India or abroad), consultants and includes non-executive and independent directors.

**“Political Contributions” means** all monetary and non-monetary contributions made towards, but not limited to, a candidate of a political party, candidate committee of a political party, political organization, political party, political action committee, or grass root campaigns intended to directly or indirectly influence the outcome of election results.

**“Political Party” means** any political party recognized by the Election Commission of India to contest for elections in past or in present and shall also include political parties debarred by the Election Commission of India.

**“Public Officials” means** anyone in the service of the Central Government, State Government or an instrumentality of the Central and State Government and includes inter alia persons employed by any government ministry, department or agency, an official of a political party, or a candidate for political office, members of Parliament or other legislative bodies, ministers of finance or other financial regulators, governors

or provincial or district leaders, members of the judiciary, government enforcement authorities, anyone working in city and local governments, at any level etc.

### **3. Scope**

This policy applies to all the Employees of the Company.

### **4. Political Contribution**

The Company is politically neutral. We are committed to and support the constitution and governance systems of the country in which we operate. However, political and charitable donations are allowed provided the donation is not made for the personal, financial, or political benefit of any Government Official, or any customer/supplier/third party (or their families). Donations must not be made to improperly influence the recipient or in exchange for any business advantage.

- 4.1. No Political Contributions by individual employees shall be made in the name of TML or be reimbursed by it, directly or indirectly. All political contributions made by the Company shall be in compliance with the provisions of the Companies Act, 2013 and the relevant rules made thereunder. No political contribution shall be made in cash. All political contributions shall be made subject to the approval of the board of directors of the Company. All political donations must be made in the name of the registered Political Party and not any individual candidate.
- 4.2. The Company will not provide any of its premises for any political exhibition, political demonstration or such other activities.
- 4.3. The Political Donations must be made with the sole objective of donations for regional development. The donations must not be made for obtaining any undue benefits or influence any person for Company's benefit.

### **5. Charitable Donations**

- 5.1 Charitable Donations by the Company may be made only where:
  - 5.5.1 The donation is made in compliance with applicable laws, regulations, local customs and TML policies, including this policy;
  - 5.5.2 The donation is not made with the objective to secure a business advantage; and
  - 5.5.3 The donation is made to an approved and verified charitable organization with clearly articulated purpose for the donation.



- 5.2 Promotional expenditure should seek to improve the image of the Company as a commercial organization, to better present its products or services or establish cordial relations. The provision of promotional items such as t-shirts, calendars, pens and other such similar items of modest value is permissible. Any other promotional expenditure (including sponsorship) must be reasonable and proportionate and the prior approval of the Ethics Officer must be obtained.
- 5.3 TML may donate capital, services, volunteer time and products. Amounts vary according to the need of the organization and the level of support determined appropriate by TML, in accordance with the terms of this Policy.
- 5.4 Notwithstanding any provision in this policy, the amount of Donations (if made in money through bank) or the equivalent monetary value (if Donation is made in kind) must not exceed Rs. 10,000 (Rupees Ten Thousand Only) in any financial year collectively for all the entities to whom Donations are made. This amount may be increased, subject to the approval of the Ethics Officer, on case to case basis.
- 5.5 The Company shall ensure, before making any Charitable Donations, the following:<sup>1</sup>
- 5.5.1 The recipient is a registered and recognized institution as per applicable laws.
  - 5.5.2 The Donations are permissible under the applicable local laws.
  - 5.5.3 The Donations are made without demand or expectation of a business return.
  - 5.5.4 A proper due diligence and background check of the recipients must be performed by the Ethics Officer to ensure the following:
    - (i) Recipient entity or any of its officers or directors must not be related to directors or executive officers of TML, other than, Tirupati Welfare Society, which is owned and managed by the Company for welfare of the employees of the Company. However, any change in the office bearers of the society shall be subject to prior approval of the Ethics Officer.

---

<sup>1</sup> The exception for donations to welfare societies is provided in Clauses 5.5.1, 5.5.2, and 5.5.3.

- (ii) The entity must not be a Political Party or affiliated to a Political Party.
  - (iii) There are no legal proceedings pending against the entity or any of its officers or directors in any court in India or outside India.
  - (iv) The entity must not be de-recognized under applicable laws.
  - (v) The entity must have necessary licenses and permits to be classified as a charity.
- 5.6 The programs and services of the recipient entity should be reviewed. They must be aligned with the Company's objective of making the Charitable Donations.
- 5.7 Donations shall not be made in cash or to the private account of an individual of the entity.
- 5.8 Any amounts contributed or donations made towards charitable causes shall be fairly and accurately reflected in TML's books of accounts for audit purposes.
- 5.9 The Donation must be compatible with the Company's Code of Conduct and other internal policies.
- 5.10 All Donations must be approved by the Ethics Officer.
- 5.11 All Employees have the responsibility to read, understand and comply with this policy. Employees should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.
- 5.12 Employees are encouraged to raise concerns about any instance, or suspicion, of malpractice at the earliest possible stage to the Ethics Officer.

## **6. Retention of Documents**

TML shall retain documents including the due diligence, receipts of donation etc. post making the donation. These documents shall be retained for a period of 8 (eight) years or such other period as specified by any other law in force, whichever is more.

## **7. Amendment**

TML reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Directors and employees unless the same is not communicated in the manner described as above.