

# **Sumitomo Mitsui Banking Corporation**

## **Corporate Social Responsibility (CSR) Policy Version: 13**

## Table of Contents

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1. Overview.....	3
2. Specification at Office .....	4
3. CSR Committee .....	5
4. Activities.....	8
5. Responsibilities of SPIN.....	11
6. Donation .....	12
7. Volunteer’s code of conduct .....	13
8. Action Plan for FY 2025-26 .....	14

## 1. Overview

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**Objective and Purpose of this document** The objective of the policy is to define Corporate Social Responsibility undertaken by SMBC (India) in alignment with Section 135 of the Companies Act, 2013 read with applicable rules.

The purpose of this document is to specify the Corporate Social Responsibility (CSR) related activities for SMBC India. It will also outline the guidelines and procedure to carry on the corporate social responsibility activities. This document will also work to define the role and responsibilities of the CSR Committee which has been constituted to administer the CSR Policy & CSR activities of the Bank.

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**When to review and update** This document needs to be revised and updated whenever there is a change in procedures, policy, or law. It should be reviewed on a regular basis at least once a year. The updated CSR Policy is uploaded on the bank's website as per regulation

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**Reference** Section 135(1) of the Companies Act, 2013 (India) – Annexure 1 and The Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time- Annexure 2

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**Target Audience** All staff working in SMBC India

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## 2. Specification at Office

### Overview

This part describes the unique attributes of SMBC India.

### Principle

SMBC commenced its commercial banking operations from its flagship branch in New Delhi on December 12, 2012.

The new Companies Act 2013 was notified by the Ministry of Corporate Affairs on February 27, 2014. Under Section 135(1) of the Act, CSR has been made mandatory for all companies operating in India effective April 1, 2014.

The Act covers all companies in India that meet any one or more of the following conditions in the immediately preceding financial year:

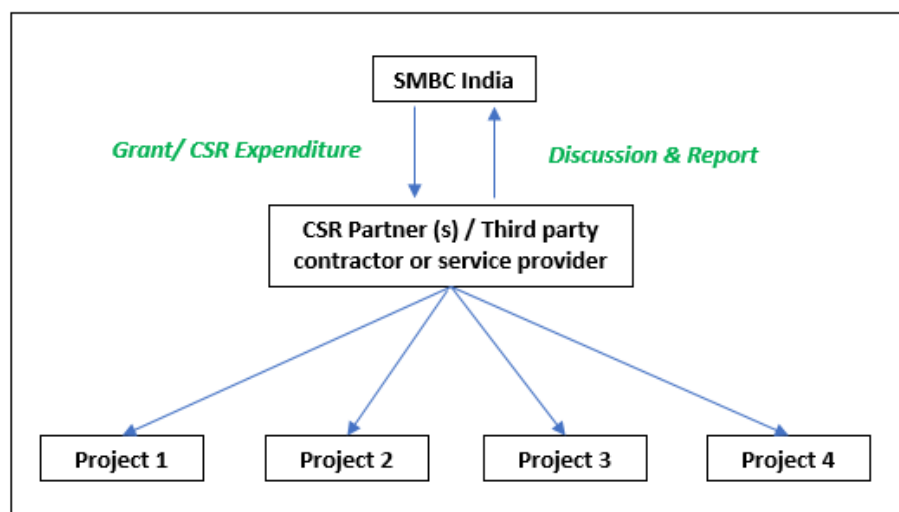
- Turnover  $\geq$  INR 10 billion
- Net worth  $\geq$  INR 5 billion
- Net Profit  $\geq$  INR 0.05 billion

If a company meets one or more of the above criteria, then it mandatorily has to comply with the Section 135(1) of the Act and take the necessary steps such as setting-up a CSR Committee, devising a CSR Policy, ensuring that the earmarked CSR expenditure is made, and mandatory reporting is done etc.

### Architecture

The CSR Committee will be a sub-committee of the Management Committee of SMBC India and will comprise of related key staff.

SMBC India will tie-up with CSR partner(s) to undertake the activities mentioned in the CSR policy or undertake direct projects with third party contractors/ service providers. The structure of execution of activities is as below:



### 3. CSR Committee

**Composition** The CSR Committee shall be composed of eight Committee members including the committee Chairperson.

The composition of CSR Committee would be as follows:

Position	Title
<b>Chairperson</b>	Managing Director - Operation, India
<b>Members</b>	Managing Director, Head New Delhi branch
	Managing Director- Japanese & Korean Corporate Banking, India
	Managing Director – Legal & Compliance, Chief Compliance Officer, India
	Managing Director- Finance & Control, India
	Executive Director & Head Chennai Branch, India
	Executive Director- Human Resources, India
<b>Secretary</b>	Executive Director- Strategic Planning, India

**Roles & Responsibilities**

1. Formulate and recommend the CSR Policy and the Annual Action Plan to the Management Committee
2. Ensure compliance to the CSR Policy.
3. Recommend and monitor CSR expenditure- at least two per cent (2%) of the average net profit before tax of the last three financial years as CSR expenditure in each financial year; this expenditure has to be spent every year.
4. Review the CSR policy on yearly basis.
5. Monitor the progress of the work being done by the selected partner including visiting the project sites.
6. Timely completion of the Annual report on CSR activities as per the prescribed format under the Companies Act, 2013.
7. In case of inability to spend the prescribed CSR amount, the Committee shall explain the reasons for failing to do so to the Management Committee as well as in the Annual Financial report.
8. Ensure that CSR activities are aligned with Schedule VII of the Companies Act, 2013 and are implemented in project/ program mode and monitored using a transparent mechanism.
9. Ensure that the contents of the CSR Policy & CSR Projects are disclosed in the Annual Financial report and displayed on the bank's website.
10. Encourage and expedite participation of staff in CSR activities.
11. Any other activity relevant to the CSR strategy of the bank.

In case of any ambiguity about any provision of the CSR policy and also in respect of matters not covered herein, a reference should be made to the Management Committee (MC) of the bank. The Management Committee is the apex body in India, and it undertakes ownership of the Branch's business and ensure that the business in India is conducted as per the applicable local laws and regulations. Therefore,

in case of any ambiguity with respect to provisions of CSR Policy, the interpretation and decision of the chairperson will be final.

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**Quorum,  
Frequency**

The quorum for the meetings shall be a minimum of five members. Additional representatives shall be called for the meeting on need basis and shall not be counted for the purpose of quorum.

The Committee shall meet at least once in a quarter or at-least four times in a year or as and when deemed necessary. The meeting of the Committee shall be called and convened by the Chairperson at three days' notice through the Secretary. In case of urgency, meeting can be called by the Chairperson at a shorter notice.

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**Approvals by  
Circulation**

Any other business that requires urgent decisions can be approved by means of Resolutions passed by circulation through email. Resolutions passed by circulation are deemed to be passed at a duly convened Meeting of the Committee and have equal authority.

Each business proposed to be passed by way of circulation shall be explained by a note setting out the details of the proposal, relevant material facts that enable the members to understand the meaning, scope, and implications of the proposal etc. The email shall also indicate how a member shall signify assent or dissent to the Resolution proposed and the date by which the member shall respond. The proposal shall deem to have been approved on receipt of approval from five members. (as per the prescribed quorum)

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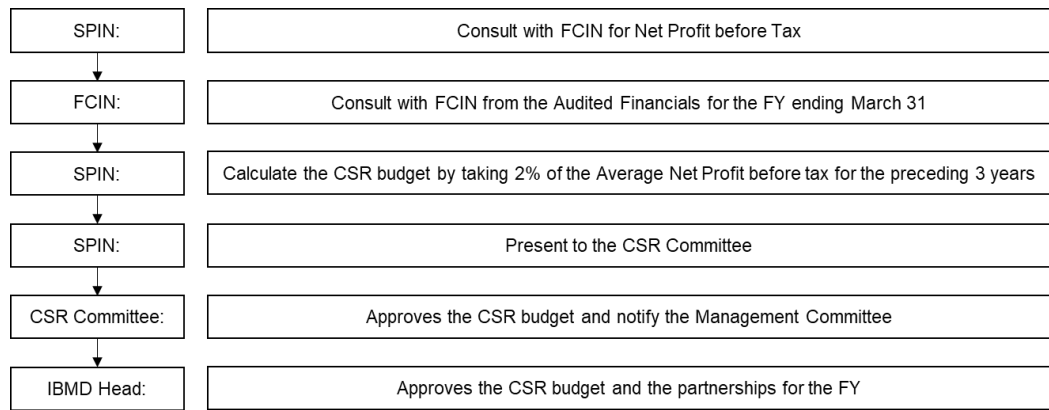
**Minutes of  
the Meeting**

The Secretary or the designated assigned person by the secretary on his behalf from SPIN shall attend all CSR Committee meetings and shall maintain accurate and adequate records of all deliberations during the Committee meetings. The agenda points with complete details shall be submitted to the Secretary / designated person who in turn shall circulate the Agenda among all the Members and additional representatives. The CSR Committee shall review the status of the action taken on points arising from the earlier meetings and in turn report to the Management Committee.

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**Budget  
Decision**

The CSR budget will be arrived at by the following process:



**Reporting Line & Timelines**

CSR Committee shall report into the Management Committee of the Bank in India. However, discussion & information sharing shall be done with Head - IBMD through the Secretariat department, SPIN before any decision regarding strategic matters is made, on recommendation of CSR Committee. Such matters may include, change in theme of CSR policy, change/ addition/ removal of CSR partner, change in CSR expenditure and other important matters.

#### 4. Activities

**Overview**

The following are the important points that have to be adhered while conducting CSR activities. They form the basis of formulating and deciding the nature of projects/ programs that will be undertaken by SMBC India towards CSR

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**Vision & Mission**

The bank through the CSR Committee must formulate the Vision and Mission for undertaking CSR activities in India, drive efforts in that direction and monitor the progress on a regular basis

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**Theme**

The theme of the CSR activities shall be as specified by law in Schedule VII of Section 135 of Companies Act, 2013 – Annexure 1.

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**Actions**

Important action points regarding the CSR policy to be adhered are:

- Activities should be recommended and presented to the Management Committee of the bank in India by the CSR Committee.
- Any changes in the Policy should be notified to the Management Committee.
- In compliance with the requirements of the Companies Act, 2013, the CSR Policy extract shall be appropriately disclosed in the Annual Financial report (as per the required format) and the same shall be published on the SMBC India's webpage.
- All activities must be undertaken in project/ program mode.
- CSR expenditure for a particular financial year must be spent in the same financial year. Inability to do so would require explanation to Management Committee and the same has to be mentioned in the Annual Financial report specifying the reasons for not spending the amount and, unless the unspent amount relates to any ongoing project, transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year]. As required under the CSR regulations (as amended from time to time) with consent of the CSR committee and the Management committee.
- Any amount remaining unspent pursuant to any ongoing project, undertaken by the Bank in pursuance of its Corporate Social Responsibility Policy, shall be transferred by SMBC India within a period of 30 days from the end of the financial year to a special account to be opened by SMBC India in that behalf for that financial year in any scheduled commercial bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by SMBC India in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer. "Ongoing Project" here means a multi-year project undertaken by the bank in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced and shall include project that was initially not approved as a multi-year project but whose duration has been extended

- beyond one year by the Management Committee of the bank based on reasonable justification.
- Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
  - SMBC India will tie-up with CSR partner(s) and/or third-party contractors/service providers as specified under Rule 4 of the CSR rules to undertake the activities. Before appointing any new partner SMBC shall conduct external party verification of the CSR partner. Also, SMBC India may conduct verification on existing partners based on the judgement of internal stake holders. In addition, the committee may decide (on need basis) to audit (by a certified audit firm) the CSR partners as & when required.
  - In case SMBC has an average CSR obligation of ten crore rupees or more in pursuance of subsection (5) of section 135 of the Companies Act, 2013, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study. The impact assessment reports shall be placed before the CSR Committee and then the Management Committee and shall be annexed to the annual report on CSR, as amended from time to time. In case SMBC India undertakes an impact assessment, then it may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed five percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is lower.
  - Projects are focused on areas as per the list given under Schedule VII of the Companies Act, 2013. These projects are reviewed and approved in the CSR committee.
  - Exception handling –In a special situation where the Bank decides to support causes that are not in the purview of the above-mentioned objective(s) but aligns with Schedule VII activities, the same will have to be approved by the CSR Committee as well as all approving authorities in the decision-making process.

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**Annual &  
Quarterly  
Activity**

The details of the projects, location of activities, the earmarked amount to be spent as CSR expenditure, identified partners, decided road map and other important information for each financial year must be approved by the CSR Committee and reported to the Management Committee of SMBC in India on an annual basis.

SPIN shall prepare and compile the required CSR Reports at the end of each financial year and circulate to CSR Committee.

On an annual basis, SPIN shall report the CSR activities in the prescribed format of Companies Act, 2013 in the Annual Financial report filed under

sub-clause (b) of subsection (1) of section 381. If the required CSR expenditure is not made, then as per regulation the differential amount would be deposited in the special account or as required by the new regulations (which are updated from time to time) and reported as and where required.

CSR Committee shall monitor the progress of the projects and activities, based on the report submitted by the CSR partner as per the agreement signed between SMBC and them. It shall review the same, discuss performance and recommend changes/ ways to improve (if needed).

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## 5. Responsibilities of SPIN

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### Overview

SPIN provides assistance to Management and CSR Committee in terms of rules and regulations pertaining to Corporate Social Responsibility of SMBC India as well as the related strategic planning, relevant activities and public relations

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### SPIN is in-charge of

1. Assisting CSR Committee by drawing up CSR strategy- CSR policy, budget plan, and being the custodian and secretariat department of the CSR committee (sub-committee of Management Committee)
  2. Assisting in partnering with CSR partner(s) which is a registered trust/ registered society/ company which has an established and sufficient track record in undertaking CSR programs and projects
  3. Ensuring implementation of policy, spending at least the mandatory expenditure on activities, monitoring the process and good governance (CSR Committee Meetings)
  4. Liaising with SMBC's related departments- mainly in SMBC NDB as well as Strategic Planning Department, Global Banking Unit ("SPDGB") for any required disclosures and reporting.
  5. Preparing and compiling the CSR Report at the end of each financial year and circulate to CSR Committee.
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## 6. Donation

Donation is referred to money that is given to help a person or organization, or the act of giving them.

Donation must be voluntary, and the use of donations has to be clarified and confirmed that does not create any negative impact to the society. Those usages that are not recognized as social contribution, such as for-profit business and support for anti-social purposes, are also not allowed.

### **For compliance**

All donations MUST comply to [HO Rules for Anti-bribery Compliance and Ethics](#).

Based on [AML Procedure Manual](#), India division must conduct screening of Donee, using filtering system like Actimize.

### **For Budget**

The donation is considered as Extra-Ordinary Expense Budget and special approval needs to be taken from the approving authority in Head Office.

The expenses code to be use is 1500- Donations.

#### ❖ **Donation Less than JPY 50,000**

SMBC India is allowed to spend the extra-ordinary expenses under **Donations of JPY 50,000 or less per item** only with the approval from Head of IBMD.

#### ❖ **Donation of more than JPY 50,000**

For donation where the amount is greater than JPY 50,000, SPDGB will assess the suitability of the donation for final approval.

### **Guide for India division - Process flow**

1. SPIN team to prepare memo, showing approval from Head of IBMD
2. SPIN team to fill out the ASPD donation application form, include - Screening result for beneficiary (based on India's KYC screening platforms, Actimize or google search etc.)
3. Email to SPDGB: [kawabe\\_takuya@dn.smbc.co.jp](mailto:kawabe_takuya@dn.smbc.co.jp); [Yamada\\_masashi@rn.smbc.co.jp](mailto:Yamada_masashi@rn.smbc.co.jp); [koike\\_yohei@dn.dmbc.co.jp](mailto:koike_yohei@dn.dmbc.co.jp)
4. Email to ASPD: 42\_経理業務部\_コーポレート予算(経理) / SMBC <[grp8328110164@dn.smbc.co.jp](mailto:grp8328110164@dn.smbc.co.jp)>
5. ASPD will provide final approval to SPIN team via email (approval to take 5 working days)

## 7. Volunteer’s code of conduct

Employees participating in any CSR activity are encouraged to follow below dos’ and don’ts: -

Do	Don’t (refrain)
<p>✔ Treat all Beneficiaries with respect and dignity</p>	<p>✘ Not impose own religious beliefs and/or political views and shall observe cultural, racial, and religious sensitivity at all times.</p>
<p>✔ Set boundaries with Beneficiaries who are overly friendly or try to seek special attention</p>	<p>✘ Speaking vulgarities – in any language, whether colloquial or slang</p>
<p>✔ Behave appropriately even if the Beneficiaries exhibit inappropriate behaviours</p>	<p>✘ Making personal attacks, threats, insults, degrading or derogatory remarks about a person or organisation</p>
<p>✔ Not have inappropriate physical or sexual contact with the Beneficiaries, even if it is consensual</p>	<p>✘ Making or using racially offensive remarks or language</p>
<p>✔ Treat all information with regards to the Beneficiaries as confidential</p>	<p>✘ Making or using religiously insensitive or provocative remarks or language</p>
<p>✔ Practice Personal &amp; Social Responsibility</p> <ul style="list-style-type: none"> <li>• Ensure you are feeling well before the volunteering activity</li> <li>• Wearing of a face mask is optional and up to personal discretion</li> <li>• Consider personal health condition before registering for volunteering activities, especially if you have chronic/complex health conditions</li> </ul>	<p>✘ Making defamatory or libellous comments</p> <p>✘ Involvement in any form of lobbying or politicising</p> <p>✘ Consuming tobacco, alcohol and any form of intoxicating consumables</p> <p>✘ Not have inappropriate physical or sexual contact with the Beneficiaries, even if it is consensual</p> <p>✘ Not take any photo, video, or make any publications about the Beneficiaries without seeking prior approval from the Community Partner</p>

## 8. Action Plan for FY 2025-26

**Objective:** SMBC India's CSR objective is to support Education of Young India, Environment related causes supporting sustainable development, health care of the community and financial literacy. SMBC India accomplishes these objectives with like-minded partners and with the commitment of our senior management.

**Scope:** The Annual Action Plan is prepared under the regulatory framework laid down under the CSR Rules issued by the Ministry of Corporate Affairs. We have also obtained guidance of the CSR Committee and the guiding principles for sustainability and social responsibility laid down by the parent bank.

Project wise details of the CSR initiatives for FY 2025-26 have been summarized below.

**Project 1 – Education of Young India (under Schedule VII point ii promoting education):** SMBC India is committed towards narrowing the educational gap in India by supporting teachers offering professional development programs and reinforcing teachers to transform the children's future for a better tomorrow by adopting an effective methodology of education. The objective is to provide high quality education to enable them to live a life of dignity and financial independence as contributing members of the society.

SMBC India is also looking at supporting the education sponsorships of the children and ensuring that there is overall development of the children by having access to quality education and proper family support to nurture them. Further, in view of digitalization and keeping up with the current trends, SMBC India will also support Digital literacy among the students by sponsoring desktops, Tab labs, laptops and digital classrooms to the schools thereby benefiting Young India.

To encourage social, cognitive, and emotional development of children belonging to the age group birth to 14 years, by providing them with the necessary educational and language foundation, to integrate them into local schools and succeed in their future endeavours, SMBC India is also supporting the children living on construction sites and Brick Kilns.

**Project 2 – Environment Sustainable development (under Schedule VII point iv ensuring environmental sustainability):** As a CSR initiative, SMBC India has designed, developed, and implemented a unique and exemplary drinking water supply network along with overhead storage tank and state of the art – world class treatment facility. As a part of SMBCs commitment, the project was embarked upon to be transformational and is aligned to the United Nations Sustainability Development Goals, Environment Sustainability and Governance and Principles of Responsible Investments. The project is an ongoing project for FY 25-26 and would be completed with individual tap connections to each household and handed over to the Community

to ensure its sustainability and long-term impact. The project will be conducted through our CSR vendor – Hindustan ECOSOFTT Pvt. Ltd.

SMBC India endeavored to support the re-cycling of the electronic waste generated within the community. This phase of project would focus on more community awareness sessions, along with capacity building of the stakeholders for enhancing the knowledge of e-waste management in the society. The project will be executed through NGO partner.

**Project 3 – Healthcare** (under Schedule VII point I - promoting health care including preventive health care): SMBC India recognizes the condition of the elderly class of citizens living in poverty. To assess the healthcare status of destitute elderly, particularly mobility issues being faced by elderly living in slums, SMBC India will be sponsoring and distributing healthcare relief material, equipment, and accessories to them. The project will be executed through NGO partner and their defined programmes.

SMBC India would be working towards identification and improvement of infrastructure enhancement in Hospitals which reaches out to the vulnerable communities, through the donation of medical equipment. The equipment would focus more on preventive healthcare and timely diagnostics for appropriate treatment of the economically weaker sections of the society. In addition, SMBC India also plans to identify projects which promote mental care support for vulnerable population of the Society.

SMBC India plans to support drinking water availability to schools located in remote villages of Maharashtra, thus contributing towards a healthy and safe learning environment for children. The project will be executed through NGO partner and their defined programme.

**Project 4 – Financial Literacy** (under schedule VII point iii for reducing inequalities faced by socially and economically backward groups). SMBC supports the vision to create gender parity and economic independence to the women to make financial decisions and improve the financial health of the community. This will equip rural and semi urban Indian women with the knowledge and understanding of financial aspects, process of financial management, and importance of saving, investment, insurance, cashless transactions, and digital payments. The project will be conducted through NGO partners.

All the projects will be targeted to be completed by the end of March 2026.

All the NGO partners along with periodic updates shall share their annual report and fund utilization certificate at the end of the project.

Monitoring:

The CSR team will carry out monitoring of timely fund utilization to ensure that the aforesaid Projects/ Programs as budgeted are being carried out. Timely visits to the

NGOs may be planned by the CSR team to have an overlook on the functioning of the NGOs.

Impact assessment:

Impact assessment is applicable for the projects undertaken during FY 2024-25. Projects eligible for impact assessment have a project closure date of 31<sup>st</sup> March 2025, therefore, impact assessment will be conducted from FY 2026-27 onwards.

**END**

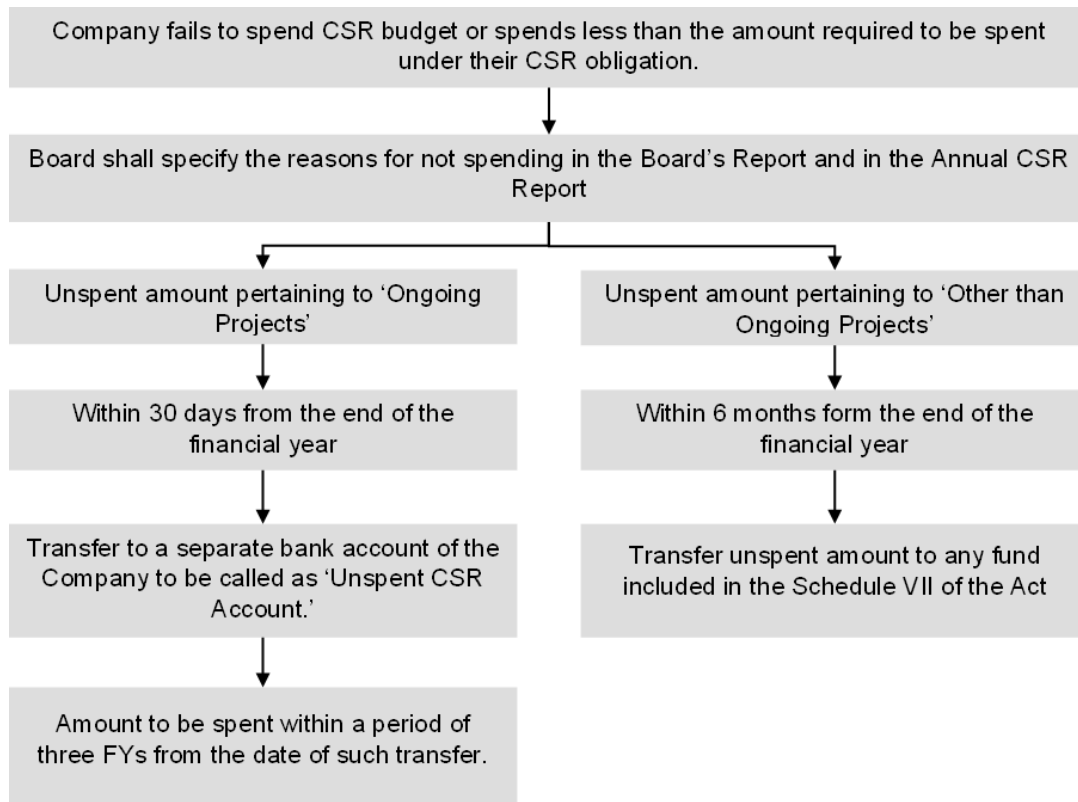
### Annexure A: Unspent CSR Account

Section 135(6) of the Companies Act, 2013 provides that in case of on-going projects / multiyear project, the un-spent funds at the end of year 1 shall be transferred to a special bank account to be opened by the Company (i.e., the unspent CSR account) within 30 days and such funds shall be spent towards the project within 3 years. Therefore, one of the major actionable is the opening of a special account called as the **'Unspent CSR Account'** in a scheduled bank in case the company has any unspent amount remaining in their CSR budget or if they have any on-going CSR project for a particular fiscal.

The relevant extract is reproduced below:

*“Any amount remaining unspent under sub-section (5), **pursuant to any ongoing project**, fulfilling such conditions as may be prescribed, undertaken by a company in pursuance of its Corporate Social Responsibility Policy, **shall be transferred by the company** within a period of thirty days from the end of the financial year **to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account**, and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.”*

As per the FAQ issued by the ministry of home affairs, vide circular dated 14 / 2021, the 'Unspent CSR bank account' needs to be opened for each 'financial year' and not for each 'on-going project'.



**Note:**

- Separate account needed for each year, but one account can hold funds for multiple projects.
- Annual report and CSR-2 will require disclosure for details of amount transferred to Unspent CSR Account. Subsequent year forms would require disclosure for amounts spent out of Unspent CSR Account.

**STEPS FOR OPENING ACCOUNT**

1. SPIN to take approval for opening the unspent CSR Account from the CSR Committee, either in a meeting of the Committee members or by email circulation with majority approvals.
2. Selection of the Signatory/ Signatories as per the consensus in the CSR Committee meeting. At the CSR Committee meeting, held on 29<sup>th</sup> May 2023, it was recommended to consider single signatory for operating this account, considering joint signatory might lead to operational issues in case of travel/ leave of senior management.
3. SPIN to ensure that the authority item is reflecting in the respective Power of Attorneys (PoAs) of the identified signatory(ies). This must be confirmed with the Legal team before further processing.
4. The Authority Matrix must be approved by the Management, for the operation of the bank account, in regard to transfer of funds, in case of fund availability in the account. This would be undertaken by SPIN in coordination with OPIN to ensure the correct matrix gets updated and reflected across all the departments.
5. Post CSR Committee approval, either in the meeting or via email circulation, SPIN to raise internal memo for approval on the Committee’s decision for opening CSR unspent Account.

**ACCOUNT OPENING REQUIREMENTS**

The following documents would be required for opening of the Unspent CSR Account:

1. Account opening form in SMBC India
2. Board approval/ Management Committee approval on opening of the unspent CSR account

**AUTHORITY MATRIX FOR OPERATING THE ACCOUNT**

The authority matrix to operate the unspent CSR account of SMBC India with single authority is given below:

<b>Assignment of Authority and Limits for Payments-SMBC India (New Delhi, Mumbai, Chennai and Bengaluru Branch)</b>				
<b>Group A = MGT, DGM, SVP, FVP, VP</b>				
<b>S.No.</b>	<b>Authorised Persons</b>	<b>Desig.</b>	<b>Signer Authority Group</b>	<b>Alliance Bank INR Nostro A/C SMBC/ Clearing Amount- INR in Millions up to:</b>
				<b>INR</b>
1	Hiroyuki Mesaki	GM	A	50
2	Masashi Takamizawa	JGM	A	20

**ACCOUNT OPERATION:**

The Unspent CSR account has to be opened on a yearly basis, a single one for multiple projects, if applicable. The fund disbursement involves the following steps:

1. Approval from the CSR Committee for the disbursement of the amount from the unspent CSR account for the specific project.
2. Filing the application for National Electronic Fund Transfer/ Real-Time Gross Settlement Systems (NEFT/RTGS), duly signed by the approved signatory.
3. Submission of the form to the OPIN remittance team for final payment.
4. Team-wise responsibility of various steps for opening of the Unspent CSR Account

**RESPONSIBILITY MATRIX:**

S.No.	Actions/ Step undertaken	Team Responsible
1.	Selection of the Signatory/ Signatories for operation of the Unspent CSR Account	CSR Committee members
2.	Authority item to reflect in the respective Power of Attorneys (PoAs) of the identified signatory(ies).	SPIN, in consultation with LEIN
3.	Authority Matrix must be approved by the Management, for the operation of the bank account, regarding transfer of funds, in case of fund availability in the account.	SPIN, in coordination with OPIN
4.	Approval for opening the unspent CSR Account from the CSR Committee, either in a meeting of the Committee members or by email circulation with majority approvals	SPIN
5.	Raising internal memo for approval on the Committee's decision for opening CSR unspent Account	SPIN
6.	Ensure the required documents to be in place before opening of the unspent CSR account.	SPIN
7.	Opening of Unspent CSR Account	OPIN
8.	Transfer of the Unspent CSR amount into the Unspent CSR Account	OPIN team in consultation with FCIN and GA-EXP
9.	Approval from the CSR Committee and IBMD Head for disbursement of the unspent amount to the designated CSR partner	SPIN
10.	Filing of the Remittance form for payment disbursement, duly signed by the authorized signatory	SPIN
11.	Remittance of the amount	OPIN