

INVESTORS' RELATION POLICY

- The financial year of the Company starts on 01st day of July of every year ends on the 30th day of June.
- The Company will place its quarterly accounts on its website.
- As per Companies Ordinance, 1984, interim results, covering the first six months of the year, will be published and placed on the website of the Company within two months of the end of the period.
- The Annual General Meeting will be held every year and shareholders will receive printed annual reports of the Company containing notice for this meeting at least 21 days before the date of meeting.
- The Company's annual report will demonstrate best practices.
- The Company's annual reports will be uploaded on the web site on the day of despatch to shareholders.
- Financial aspects of the business will not be discussed during the closed periods of the Company and investor meetings/calls of any kind will be discouraged.
- The Company will not comment on market or press speculation.
- The Company will comply with disclosure requirements of the Stock Exchanges on which it is listed.
- Investors can discuss business issues with the Company Secretary with prior notice.
- The Company will not make derogatory comments on competitors.
- The Company will ensure that all investors have access to the same level of information.

1. Policy statement

Enterprise Risk Management enhances an organization's ability to effectively manage uncertainty. It is a comprehensive, systematic approach for helping all organizations, regardless of size or mission, to identify events, and measure, prioritize and respond to the risks challenging its most critical objectives and related projects, initiatives and day-to-day operating practices.

Millat Tractors Limited (the Company) defines risk as any potential event which could prevent the achievement of an objective. It is measured in terms of impact and likelihood. Risks arise as much from the likelihood that an opportunity will not happen, as it does from the threat or uncertainty that something bad will happen.

The Company's policy is to identify, analyze and respond appropriately to all risks. The risk responses selected are determined by the appetites and tolerances for risks. These will vary over time according to the specific business objectives, for example strategic, operational or asset protection.

The effectiveness of risk management and control measures will be regularly reported to and acted upon by the Board. In addition, periodic independent review on the effectiveness will be conducted.

1.1. Responsibility

The Board is responsible for the Enterprise Risk Management Framework. The Senior Leadership Team under the leadership of the Chief Executive Officer is responsible for implementing the strategy, culture, people, processes, technology and structures which constitute the Enterprise Risk Management Framework.

1.2. Policy Review

This policy and underlying principles will be reviewed annually by the Board, to ensure its continued application and relevance.

1.3. Key principles on risk management

- In order to achieve the Company's objectives, risks are to be considered and managed enterprise-wide
- Risk management is integral to the strategic planning process, business decision making and day-to-day operations
- Risks are identified, analyzed, responded to, monitored and reported on, in accordance with the Company's policy and risk management framework
- Continuous monitoring by management is imperative

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1. Policy statement

The objective of this policy is to ensure a safe and secure environment by assisting in reporting of any improper or illegal activity, possible violations of internal guidelines, regulations or the code of conduct.

2. Definition of whistleblower

A whistleblower as defined by this policy is an employee who reports an activity that he/she considers to be illegal or inappropriate and its disclosure must be in public/Company's interest. This means it has an adverse effect on the Company or general public.

The whistleblower is not responsible for investigating the activity or for determining fault or taking corrective measures; designated Management officials are charged of these responsibilities

If an employee has knowledge of or a concern of any fraudulent activity, the employee has to report at designated contacts.

The employee must exercise sound judgment to avoid baseless allegations

An employee who intentionally files a false report of wrongdoing will be subject to disciplinary action as well.

3. Policy procedure

3.1. Complaints that may lead to whistleblowing

Following are a few examples of complaints that come under whistleblowing. This list is not exhaustive:

- Criminal offence- fraud etc.
- Endangering staff's health and safety
- Risk or actual damage to the environment
- Miscarriage of justice
- The company is breaking the law,
- Covering up wrongdoings
- Act which results in loss to company.

3.2. Complaints that do not count as whistleblowing

Personal grievances (e.g. bullying, harassment, discrimination) are not covered by whistleblowing, unless particular case is in the public interest.

3.3. Designated reporting channel

Activities that come under Whistle blowing policy shall be reported to CEO-MTL via E-mail:

E-mail:

3.4. Procedure

- Upon receipt of a concern or a complaint, Head of HR Department shall:
 - Determine the nature of the concern or complaint.
 - Acknowledge receipt of the concern or complaint to the complainant within ten working days.
- Complaints pertaining to accounting matters shall be referred to Financial Disciplinary Committee and the rest of the complaints shall be referred to the Administrative Disciplinary Committee.
- Initial Inquiries shall be made to determine whether an investigation is appropriate or not. Some actions may be resolved by agreed action without the need for investigation.
- The Financial Disciplinary Committee may enlist employees of the Company and/or outside legal accounting or other advisors to conduct any investigation of complaints relating to financial matters.
- The extent of contact between the complainant and the team conducting the investigation shall depend on the nature of issue and clarity of information provided.
- If deemed appropriate by the Financial Disciplinary Committee/Administrative Disciplinary Committee, notice of any corrective action taken will be reported back to the complainant.

3.5. Composition of committees

ADMINISTRATIVE DISCIPLINARY COMMITTEE

- Head of Admin Department
- Head of HR Department
- Chief Financial Officer
- Head of Internal Audit Department

FINANCIAL DISCIPLINARY COMMITTEE

- Head of Internal Audit Department
- Head of Admin Department
- Chief Executive Officer
- Chief Financial Officer

4. Protection

4.1. Confidentiality

Confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

4.2. Retaliation

The Company will not retaliate against a whistleblower or any of its employee accused. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the HR Department personnel immediately.

5. Retention of complaints & investigation

The head of HR Department shall maintain a log of all reported concerns or complaints and shall prepare periodic summary report for the CEO.

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1. Policy statement

Millat Tractors Limited (MTL) is a public listed corporation incorporated under the Companies Ordinance, 1984 (now the Companies Act, 2017). The company is principally engaged in assembly and manufacturing of agriculture tractors, implements and multi-application products.

MTL and its management is cognizant of the fact that effective Corporate Social Responsibility will entail positive impact on its stakeholders, communities and environment in various aspects related to its operations. MTL proactively act as a responsibly corporate citizen by promoting and patronizing various initiatives under its CSR program.

In order to implement CSR initiatives in a more formal and organized manner, following framework is being laid down to ensure all CSR activities are carried out with a transparent and socially responsible strategy in-line with SECP Voluntary CSR Guidelines.

2. CSR vision

MTL strongly believes in investing its responsibilities towards a sustainable society and act as a strong contributory member. MTL recognizes the importance of its employees, their work-life balance, safety, security, reducing carbon footprint for a greener environment community uplift programs, customers, ethical behaviors in all dealings, contribution to national exchequer and welfare programs under all facets.

Under this vision, CSR activities by MTL can be categorized as follows:

2.1. Philanthropic activities

- Contribution to educational institutions – Preferably run through Charities and donations
- Contribution to health institutions – Preferably run through Charities and donations
- Efforts and contributions towards natural calamities
- Public welfare spending in underprivileged areas preferably nearest to the Factory premises.
- Supporting our cultural values, arts & crafts.
- Any other not specifically mentioned

2.2. Non-philanthropic activities

- Energy management drive through energy conservation programs.
- Environmental protection measures through initiative of green engine technology.
- Encouraging healthy activities by participating in horticulture and sports competitions.
- Consumer protection measures by providing customers after sale services and product warranty.

- Occupational safety and health by ensuring safe and healthy working environment for employees with the provision of protective gears and necessary trainings.
- Contribution towards Gross Domestic Product via distribution of funds to National Exchequer in terms of Corporate Income Tax & other levies.
- Conducting business ethically while complying with all laws and regulations of the state.
- Active contribution for the welfare of employees with respect to Industrial Relations through Hajj Policy and Children Education Awards since decades.

3. Reporting and approval

- All philanthropic CSR activities shall be reported to Board of Directors once every quarter for approval after authorization from Chief Executive Officer
- Disclosure of CSR activities shall be made part of Annual Director's Report