

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

BAJAJ CAPITAL INSURANCE BROKING LIMITED

1. Purpose:

This policy sets out the Company's commitment & approach towards Corporate Social Responsibility based on our philosophy of always acting in the interest of others be it our clients, employees, vendors or the society that we operate in. The Company is committed to the society for improving the quality of life of the communities we serve through the CSR theme of 'Building Sustainable Community'. The Company intends to be a significant contributor to CSR initiatives in India by devising, implementing and contributing to projects focussed on education, enhancement of livelihood, equality, environmental sustainability, and socio-cultural development in the areas where it operates.

Bajaj Capital Insurance Broking Limited will endeavour to make a positive impact on the society & community through CSR activities which develops/improves their economic status and conserves the environment. We will ensure sustainability by doing what is right, through the adoption of sustainable business practices, employee policies and technologies.

The Board of directors of the Company ("Board") constituted a Corporate Social Responsibility Committee ("CSR Committee") in terms of Section 135 of the Companies Act, 2013 ("Act"). The CSR Committee is comprised of Mr. Sanjiv Bajaj and Mr. Anil Kumar Chopra, being Member (Non-Executive Director)/

2. Philosophy & Objectives

We endeavour to protect the interests of all our stakeholders and contribute to society at large, by making a measurable and positive difference and serve through long term stakeholder value creation.

The Company has the vision to build the Company by securing the financial future of its customers and the Company's mission to bring about strong social relevance. It aims to be committed to social causes which are relevant for its inclusive growth and to contribute to society by supporting social causes.

3. Focus Areas/Sectors:

In line with the requirements of the Act, the Company's CSR programmes shall mainly focus on the following areas:

Following are the CSR activities to be undertaken by the company:

- Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
- promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
- protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts;
- measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports.
- contribution to the Prime Minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;

- (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
- (b) Contributions to public funded Universities as prescribed in Schedule VII;
- rural development projects
- slum area development.
- disaster management, including relief, rehabilitation and reconstruction activities.

4. Directional to Mandatory CSR Liability: It is mandatory to spend the CSR amount under the revised Rules.

- i. CSR Liability – if Entire amount spent – Report in Directors’ Report
- ii. CSR Liability – if entire amount not spent:
 - a) Is there an ongoing project – NO – Transfer to Govt. funds notified in Schedule VII within 6 months of the expiry of the Financial Year;
 - b) Is there an ongoing project – YES – to open an Unspent CSR Account with Bank for each particular year within 30 days of the expiry of the Financial Year – Deposit the unspent amount – if not spent/utilized within 3 years – transfer the same within 30 days to Govt. funds as notified in Schedule VII after the expiry of the 3rd Financial Year.

5. Responsibility of the Board:

The Board shall be responsible for –

- Approving the CSR policy of the Company as may be recommended by the CSR Committee, subject to such changes/modifications as the Board may deem fit;
- Ensuring that in each financial year the Company spends such amounts for CSR activities as may be stipulated in the Act and as may be amended from time to time;
- Ensuring that the activities included in the CSR Policy are undertaken by the Company itself or through the implementation agencies as prescribed under the CSR Rules.
- The Board shall ensure that the administrative overheads as defined in CSR Amendment Rules, 2021 shall not exceed five percent of total CSR expenditure of the Company for the financial year.

6. CSR Committee:

The CSR Committee of the Company shall be responsible for:

- formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII;
- Recommending to the Board the CSR expenditure to be incurred.
- Monitoring the implementation of the CSR Policy from time to time.

7. CSR Funding and CSR Expenditure

- **CSR Budget:** The amounts to be spent by the Company shall be as stipulated under the Act with such amendments, modifications and/or alterations as may be made from time to time and as approved by the Board.
- **CSR Expenditure Funds:** The CSR Committee will present the Annual Action Plan to the Board, detailing the action steps, modalities and the estimated CSR expenditure to the Company, for the Board’s approval. The CSR Committee shall prepare the Annual Action Plan together with Bajaj Capital Foundation Trust or any other NGO it decided to work with.
- **Surplus arising out of CSR Activities:** Any surplus arising out of the CSR activities shall not form part of the business profit of the 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 of the Companies Act, within a period of six months of the expiry of the financial year.
- **Treatment of excess expenditure:** Where a company spends an amount in excess of requirement provided under sub-section (5) of section 135 of the Companies Act, such excess amount may be set off against the

requirement to spend under sub-section (5) of section 135 of the Companies Act up to immediate succeeding three financial years subject to the conditions stipulated under the Companies Act.

- **Treatment of unspent CSR Expenditure:** If the Company fails to spend the CSR funds as obligated under the relevant provisions of the Companies Act, the Board shall, in its report made under the Companies Act, specify the reasons for not spending the amount and such unspent CSR funds shall be treated as per the specified provisions of the Companies Act.
- The CSR Committee shall formulate and recommend to the Board, separately or as a part of the CSR Policy, an annual action plan as per the provisions of the Companies Act.

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

8. Implementation, monitoring and review mechanism

- The CSR activities will be driven by a Project Leader under the aegis of the CSR Committee and the Board. The CSR Committee will play a significant role in assimilation of the CSR policy across the Company at all levels and ensuring that the CSR initiatives are in line with this policy;
- The CSR Committee will be responsible for monitoring approved projects and fund disbursements for such projects. The CSR Committee will put in place a transparent monitoring and reporting mechanism for ensuring effective implementation of the projects, programmes and activities proposed to be undertaken by the Company. Such monitoring mechanisms will include on-site visits, meetings and progress/status reporting by the project team;
- The CSR Committee shall periodically review the CSR project reports and the same shall be presented to the Board at such intervals as the Board deems fit and atleast on an annual basis.

9. Modality of Execution of CSR Activities of the Company:

The Company shall execute and undertake the CSR Activities through Bajaj Capital Foundation Trust and/or any other NGOs, if required.

10. Impact assessment:

If the average CSR obligation of the Company in pursuance of Section 135(5) of the Companies Act is ten crore rupees or more, in the three immediately preceding financial years, the Company shall undertake impact assessment through an independent agency, of its CSR projects having outlays of one (1) 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 Board and shall be annexed to the annual report on CSR. The expenditure on such impact assessment may be booked by the Company towards CSR 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 less.

11. Responsibilities of the Board and CFO and Disclosure Requirements

The Board of Bajaj Capital Insurance Broking Life Insurance shall be responsible for following:

- **CSR Policy:** Basis the recommendation of the CSR Committee to review and approve the CSR Policy (as defined in the definition part supra).
- **Implementation and Annual action Plan:** Ensure implementation of the activities proposed to be undertaken by the Company and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the Annual Action Plan.
- **Funds Utilization and CFO Certification:** That the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- **Matter relating to Ongoing Project:** In case of ongoing project, monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

LIST OF CSR PROJECTS APPROVED BY THE BOARD

S.No.	Project (Multiyear)	Geography	Schedule VII Reference	Implementation Mechanism	Timeline
1.	Women Upliftment	Pan India	(ii)	Implementation Agency	Annually
2.	Benefit to armed forces veterans, war widows and their dependents		(vi)	Implementation Agency	Annually
3.	Benefit to Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;		(vi)	Implementation Agency	Annually