



**CORPORATE SOCIAL  
RESPONSIBILITY POLICY OF  
HDFC LIFE INSURANCE COMPANY  
LTD.**



Version 6

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# CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

## 1. Preamble

The Corporate Social Responsibility Policy (hereafter referred to as 'Policy') of HDFC Life has been designed in consonance with Section 135 of The Companies Act, 2013 (hereafter referred to as 'Act') to lay down the guidelines for undertaking CSR initiatives at HDFC Life in accordance to Companies (Corporate Social Responsibility Policy), Rules, 2014 (hereafter referred to as 'Rules'). This Policy lays down the guiding principles or rules that shall apply to all CSR programs/projects to be undertaken by the Company, as per Schedule VII of the Act, within the geographical limit of the Republic of India.

## 2. Vision Statement

HDFC Life's business philosophy highlights the theme of self-respect and independence. HDFC Life has undertaken CSR activities with the basic aim of contributing towards easing of distress and aiding in the advancement of society, while engaging with stakeholders; thereby becoming a socially responsible corporate citizen. The vision statement of HDFC Life with regard to its CSR activities is as follows:

- i. The Company aspires to be a responsible Corporate Citizen by contributing to nation building through CSR projects/ programmes, in true letter and spirit, as enshrined in the Act.
- ii. The Policy, which has been made in alignment with the vision and values of the Company, lays down guidelines and mechanisms to be adopted by the Company in order to carry out CSR projects/programmes.
- iii. All CSR interventions will be conceived and implemented through a focused approach towards target beneficiaries for generating maximum impact.
- iv. CSR initiatives of the Company will be carried out in partnership with credible implementing agencies and directly through projects executed by project management teams.

## 3. Objectives of the Policy

1. To define HDFC Life's framework for CSR.
2. To constitute a Board CSR Committee that will ensure compliance to Section 135 of the Act and oversee implementation of CSR Policy and interventions.
3. To lay down the guidelines & mechanism to carry out CSR projects/ programmes by HDFC Life and to report the impact and outcome in the reporting format prescribed by the Rules in the Act.
4. To undertake CSR activities as projects/ programmes with specific timelines, implementation and monitoring mechanism.

This Policy, as amended, is applicable with immediate effect to HDFC Life.

## 4. Principles of HDFC Life's Approach to CSR

At HDFC Life, we see CSR as the commitment of our businesses to manage and improve the economic, environmental and social implications of our activities at the local, regional and national levels by undertaking various projects.

### 1. Employee Engagement

There shall be active participation from employees of HDFC Life in the CSR interventions. Employees shall contribute their time and skills to the initiatives, thereby adding immense value.

### 2. Focused Beneficiary

Each of HDFC Life's CSR interventions would be conceived and implemented with a focused approach towards a target beneficiary to achieve maximum impact. Although impact may be felt by more than one beneficiary group, impact measurement would be in terms of assessing the difference made to the intended beneficiaries.

### 3. Collaboration

In order to leverage expertise, build cohesion and achieve greater impact through the activities undertaken, the CSR initiatives of HDFC Life shall be carried out in collaboration with credible third parties such as NGOs, corporate organizations with aligned interests, incubation centers and other implementing agencies (including a Registered Trust or a registered society or a Company established by HDFC Life or a holding company or a subsidiary company or an associate company under Section 8 of the Act or otherwise).

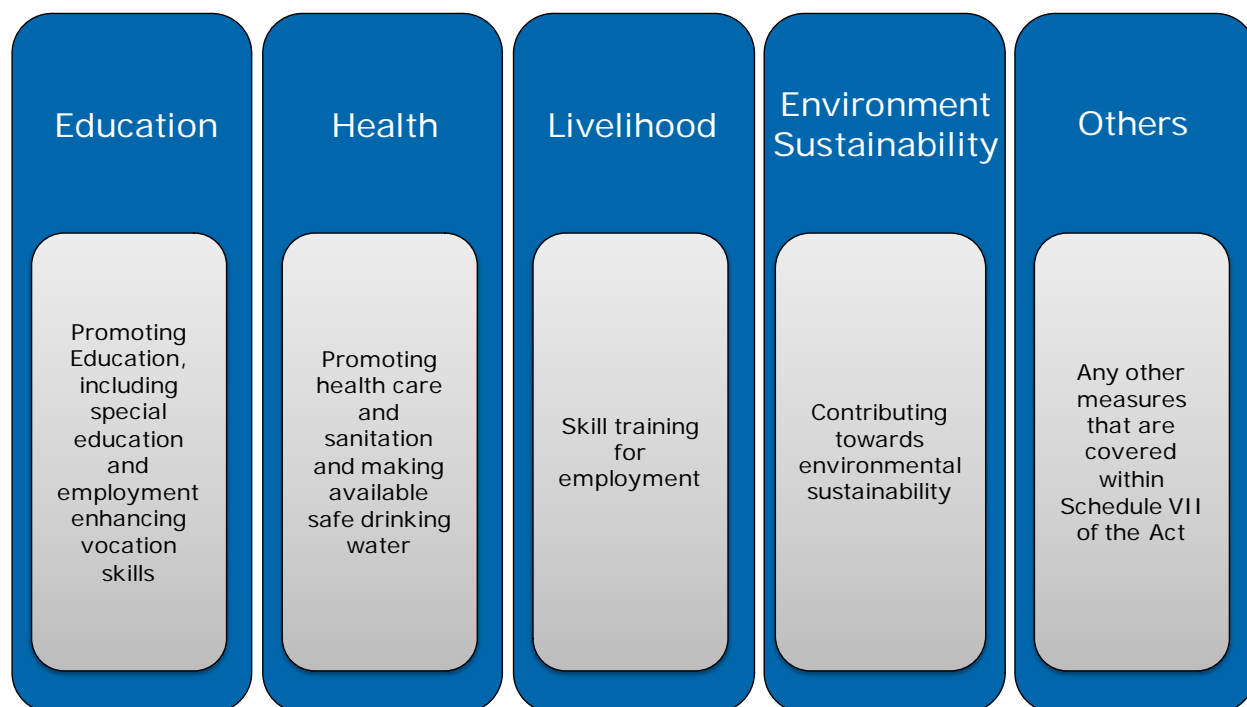
### 4. Linkage to Domain Expertise

HDFC Life believes in sharing knowledge and domain expertise by integrating business models with social and environmental priorities and processes. HDFC Life hopes to achieve the same through CSR activities by designing initiatives, the implementation and impact of which shall be linked to its domain expertise.

The CSR activities may be undertaken by the Company as per this Policy as projects, programmes, or activities (either new or ongoing).

## 5. CSR Framework of HDFC Life

The **CSR Framework** developed for the next 3 years, focuses on the following 5 Areas of Intervention, which are in line with Schedule VII of Companies Act 2013 and beyond business as usual.



## 6. CSR Budget

1. The Company will ensure that in each Financial Year (FY), at least two per cent of the average net profit (calculated as per Section 198 of the Act) made during the three immediately preceding FYs, is spent on CSR projects / programmes subject to regulatory requirements as applicable from time to time
2. If the amount indicated above is not spent in entirety in that FY, the reasons thereof will be outlined as per Section 134 (3) (o) of the Act.
3. Projects/programmes will be identified and budgets allocated through a process, incorporating identification of suitable implementation agencies, need assessment (where required) and clear outlining of desired outcomes.
4. If the Company makes any surplus or profit from pursuing its CSR projects / programmes, these will not form part of the business profit (but instead will be carried forward to the following year / (s) as part of either the CSR corpus or as an additional fund to the following year's CSR budget).
5. When undertaking a CSR project in collaboration with other companies, institutions, the company will report on its share of CSR expenditure only.

## 7. Governance Mechanism

HDFC Life has constituted a robust governance mechanism to oversee the implementation of its CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013.

The governance for the CSR interventions of HDFC Life will be headed by:

1. A five member CSR Committee of the Board of Directors comprising of :
  - i. Chairman
  - ii. Two Independent Directors
  - iii. Managing Director & CEO
  
2. An Internal Committee comprising of the:
  - i. Managing Director & CEO
  - ii. Sr. EVP Sales & CMO
  - iii. CFO

These committees, along with the CSR team, will be responsible for executing the CSR Projects as per HDFC Life's CSR Policy.

All projects would be approved by the CSR Board Committee, subject to the delegation of authority mentioned below.

### **Delegation of Authority for according approval of any CSR project proposal would be as under:**

1. In respect of CSR projects/ programmes/ activities, up to Rs. 25 Lakh per annum shall be approved by the Internal Committee. Proposals beyond Rs. 25 Lakh per annum shall be approved by the CSR Board Committee.
2. The cumulative spend of the projects approved by the Internal Committee in a financial year shall be limited to Rs.250 Lakh.
3. The Internal Committee shall approve variances, if any, in payouts of projects approved by the Board Level CSR Committee up to a limit of Rs. 25 Lakh per project.

Projects approved by the Internal Committee will be ratified by the Board level CSR Committee in the subsequent meeting.

## 8. Monitoring & Evaluation

The CSR team, comprising of an in-house team of experts, will play a critical role in routine monitoring and analysis of the CSR project through various steps including impact assessment, progress of the project vis-à-vis the prescribed timelines / budget etc. The monitoring mechanism may include visits, meetings, and progress / status reports.

A comprehensive monitoring mechanism will be devised by the company to ensure that the CSR process functions as mandated by the Act and the Rules, ensuring that all projects/ programmes, as budgeted and scoped, are duly implemented.

## **9. Impact Assessment**

In order to assess the impact of its CSR projects and programmes, the company shall institute appropriate mechanisms to maximize outcomes and build-in sustainability, scalability and replicability of the projects.

## **10. Reporting**

The company shall follow and comply with the requirements for disclosure of the CSR Policy and/or CSR activities in the Board's Report and on the website of the company or otherwise, as may be required, in terms of the provisions of the Act.

## **11. Policy Review**

The Policy shall be subject to review by the CSR Committee / Board on an Annual basis or as per the requirement.

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## REVISION HISTORY

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1.0	1st June 2011	Gazala Shaikh	Rajendra Ghag	Baseline Version
1.1	15th October 2013	Gazala Shaikh	Indranil Choudhury, Rajendra Ghag	Version 1
1.2	9th April 2014	Gazala Shaikh	Indranil Choudhury, Rajendra Ghag	Version 2
1.3	14th January 2015	Gazala Shaikh	Chandrasekhar R, Rajendra Ghag	Version 3
1.4	19th July 2016	Manjiri Narayanan	Rajendra Ghag	Version 4
1.5	10th July 2017	Manjiri Narayanan	Rajendra Ghag	Version 5
1.6	21st June 2019	Subrato Roy	Rajendra Ghag	Version 6