

ICICI LOMBARD GENERAL INSURANCE COMPANY LIMITED
ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICY

I. Introduction:

ICICI Lombard General Insurance Company Limited (“the Company”), is one of the leading private general insurance companies in India that offers a comprehensive and well-diversified range of insurance products & services (Motor, Health, Crop, Fire, Personal Accident, Marine, Engineering, Liability and Miscellaneous insurance) through its multiple distribution channels. The Company is committed towards integrating highest standards of Environmental, Social & Governance (ESG) practices in its business activities and regards ESG as a core component of its functioning which goes beyond compliance requirements. The Company shall endeavour to create a positive impact on the economy, society and the environment through its operations. The Environmental, Social & Governance Policy (“Policy”) of the Company is intended to ensure that the Company adopts responsible and sustainable business practices in line with ESG principles and encourage its value chain partners to adopt responsible and sustainable business practices as a part of their operations.

II. ESG Philosophy:

The Company’s commitment to ESG is underpinned in its philosophy “Nibhaye Vaade” which means fulfilling promises to all its stakeholders. The Company is committed towards integrating sustainable practices while fulfilling its strategic objective of achieving profitable growth. The Company endeavours to promote long-term sustainable growth through business initiatives and responsible corporate citizenship

III. ESG Governance:

ESG governance structure at the Company comprises of the Board Committees (CSR & Sustainability Committee and Risk Management Committee), the Management level Committee (ESG Steering Committee) and the Employee level (Cross functional teams). This structure ensures that sustainability principles are embedded at all levels of the Company, making it a collective responsibility for its employees. The functions of various committees are as below:

Board Committees	Management level Committee	Employee level
<ul style="list-style-type: none"> • CSR & Sustainability Committee: Oversees the ESG governance across the organization, ensuring accountability • Risk Management Committee: Focus on the management of ESG risks 	ESG Steering Committee is responsible for overall management and execution of ESG strategies.	Cross functional team is responsible for implementing the ESG framework and driving progress along the ESG roadmap.

In addition, the Company's Board approved Enterprise Risk Management framework has incorporated ESG as a separate risk group which is given appropriate weightage. The Key Risk Indicators in the areas of ESG will include indicators relating to environmental impact risks, etc. The Company will monitor ESG related risk indicator/s on a quarterly basis and present the findings to Risk Management Committee.

Areas that are within the purview of other Board Committees shall continue to be overseen by the respective Committees. Any updates relevant to ESG in these areas will be presented to the Risk Management Committee.

IV. Key focus areas for ESG:

1. Sustainable Underwriting:

The Company in its endeavour to adopt sustainable business practices shall strive to focus on building capacities and developing innovative risk solutions that aids its transition towards low carbon economy, develop product & services enabling inclusiveness across large spectrum of society i.e. SME, MSME, Rural community, Retail amongst others.

The Company shall engage with the insured companies on Risk Management, providing solutions to identify & help manage their risk through advisories, in turn creating awareness & motivating the customers to improve the physical risk at the location by reducing the probability and / or severity of the potential losses or incidences. The Company shall engage with the insured companies on environmental,

climate-related and sustainability related issues through periodic risk management physical visits, virtual engagements or through awareness campaigns.

The current underwriting process involves risk analysis and detailed understanding of underwriting factors affecting the potential risk of the customer. While evaluating potential companies for exposure, the Company will systematically integrate ESG considerations.

2. Responsible Investment:

The Company is an institutional investor in various listed / unlisted investee companies with the spread of investments across different asset classes like bonds, government securities, equity, alternative investment fund, etc. With an efforts to create and deliver sustainable and long-term value to all its stakeholders, the Company has framed a Responsible Investing Framework, which would supplement its Investment Policy to guide the investment team in taking investment decisions with due consideration to environmental and climate change aspects. As a part of the framework, the Company applies Environmental, Social and Governance (ESG) factors to evaluate the individual issuers and also has an exclusion / negative list of sectors which are consistent with its investment strategy and broader sustainability goals.

The investment team includes the Chief Investment Officer (CIO), Equity Fund Manager, Fixed Income Fund Manager, and Analysts / Dealers. The ESG risks are assessed and analysed at the analyst level, reviewed by the fund managers and the ESG critical aspects are then presented to the CIO for decision making. The ESG Steering Committee and Investment Committee are briefed regularly on the developments of the Responsible Investments Framework. The ESG risks of the investee company are analysed through the ESG ratings / scores and rationale reports provided by the external ESG rating agency. In the case of unrated investee companies, an in-house investment research team evaluates / analyses respective corporate disclosures and publications on ESG made by the investee company, to evaluate the risks involved.

The Company has a Stewardship Policy, in accordance with which it will engage with the investee companies and vote on various resolutions. The Company considers proxy voting as a core part of its investment and stewardship processes. This includes evaluation of shareholder proposals on issues concerning environment, climate change and governance. As a shareholder and bondholder, the Company will engage with the management of the investee companies, these engagement activities are carried out through the circulation of questionnaires to these investee companies on environmental, social and governance matters.

3. Community Development Initiatives:

The Company has formulated the CSR Policy which sets out the framework guiding the Company's CSR activities. The Policy also sets out the rules to be adhered to while implementing CSR activities.

The Company has chosen specific areas to focus as part of its CSR roadmap. These include health care, road safety, education, sustainable development and ecological balance, ESG, skill development & sustainable livelihoods.

The Company strives to ensure that suppliers do not engage in any activities that are related to child labour, forced & bonded labours.

4. Information & Cyber Security:

The Company is committed to protecting the customer's personal data it holds, and processing such personal data in a way that is consistent with applicable security best practices. Necessary security controls are implemented to safeguard customer personal identifiable and sensitive information from unauthorized access and data leakage.

The Company has established a Board approved Information & Cyber Security Policy which also incorporates a cyber-crisis management plan. The Company has a governance framework for Information and Cyber Security with oversight from the Information Security Committee (ISC) which has executive level representatives from all functions within the Company. The Information Technology Strategy Committee (IT Strategy Committee) and Risk Management Committee (RMC) oversees risk-related matters within the Company by reporting issues to the Board, receiving updates from the ISC on Information Security risks, and providing periodic assurances to the Board. Implementation of the policy & plan ensures all information assets are safeguarded by establishing comprehensive management processes throughout the organization.

The Company's Cyber Security approach covers all aspects of prevention, detection and response to cyber threats. The Company has implemented controls which include 24*7 Security Operations Centre (SOC), Distributed Denial of Service (DDoS), Cloud Security Management, Advanced Threat Prevention, Next Generation Firewall with integrated Intrusion Prevention System (IPS), Data Leakage Prevention, Threat Intelligence and Phishing, Breach Attack Simulation Exercises, Attack Surface Monitoring, Vulnerability Management Program, Brand Monitoring, Data encryption & masking, etc.

In line with the Digital Personal Data Protection (DPDP) Act, the Company has formally initiated its DPDP compliance program and is executing a structured roadmap to achieve compliance within the timelines prescribed by the regulatory authorities.

As part of the Company's Information Security framework based on ISO 27001:2022, ISO 27017:2015 standards and prescriptions from Insurance Regulatory and Development Authority of India (IRDAI) and International Financial Services Centres Authority (IFSCA), independent auditors periodically review, validate and certify the controls implemented by the Company.

The ISC function is headed by the Chief Information Security Officer (CISO) which is responsible for the establishment, implementation, operation, monitoring, review, maintenance, and improvement of Information & Cyber Security initiatives of the Company. ISC meetings are carried out on Quarterly basis to review, discuss and approve information security risk and ensure that they are accurately reported and appropriately dealt with. The proceedings of the ISC are presented to the IT Strategy Committee and Risk Management Committee on a quarterly basis.

5. Corporate Governance:

The Corporate Governance philosophy of the Company is based on an effective Independent Board, the separation of the Board's supervisory role from the executive management and the constitution of the Board Committees to oversee critical areas. Corporate Governance at the Company emphasis on Board's independence which is essential to bring objectivity and transparency in the management and in the dealings of the Company. Non-executive, Independent Directors constitute a majority on most of the Board constituted Committees and all the Board constituted Committees are chaired by Non-executive, Independent Director of the Company.

The Board has identified the core skills / expertise / competencies for the effective functioning of the Company in compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and IRDAI (Corporate Governance for insurers) Regulations, 2024 issued by IRDAI.

The Company is committed to conduct business with the highest standards of compliance, integrity, honesty, fairness and responsible business practices with zero tolerance for fraud or illegal acts. The Company's Corporate Governance architecture has been strengthened through various Policies, Frameworks and Codes adopted by the Company as indicatively listed below:

- Anti-Bribery and Anti-Corruption Policy

- Anti-Fraud Policy
- Anti-Money Laundering/ Counter-Financing of Terrorism Policy and Framework
- Board Diversity Policy
- Business Continuity Management Policy
- Code of Conduct to regulate, monitor and report trading by its Designated Persons
- Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information
- Conflict of Interest
- Corporate Social Responsibility Policy
- Employee Health & Safety Guidelines
- Employees Code of Conduct
- Enterprise Risk Management Framework
- Framework for the Solvency Margin of Large Risks
- Green Procurement Guidelines
- Guideline against Sexual Harassment at Workplace
- Information and Cyber Security Policy Operational Risk Management Policy
- Policy on appointment and compensation of Employees and framework for remuneration to Non-executive Directors
- Policy on Related Party Transactions
- Protection of Policyholder Interest
- Supplier Code of Conduct
- Whistle Blower Policy

6. Customer Relationship Management:

The Company upholds high standards of ethics and fairness in all its interactions with customers. This includes prompt and fair resolution of claims, transparent pricing, and strict adherence to regulatory guidelines.

- **Transparent Communication:** The Company is committed to provide clear and transparent communication at every step of the customer interaction, and not limited to clear documentation of insurance policies, regular updates on claim processing, and proactive communication during any major policy changes.
- **Customer-centricity:** The Company places its customers at the centre of everything it does, with focus on meeting their needs and providing exceptional service. This can include personalized insurance products, responsive customer service, and easy-to-use digital tools.

- Continuous improvement: The Company strives to continually improve the products and services based on customer feedback and changing market dynamics. This can include regular customer surveys, active engagement on social media, and ongoing investment in research and development.
- The Company works relentlessly to meet the changing needs of the customers. It's utmost priority is to build an ecosystem that provide a truly seamless customer experience at every touch point.
- As a leading private general insurance company, the Company has embraced technology to improve processes as well as offer convenient solutions to its customers. From policy updates to making a claim, the Company provides insurance purchase and servicing solutions across multiple platforms.
- The Company, will continue to pioneer many customer empowerment solutions using Artificial Intelligence with intuitive journeys across instant messaging applications and at contact centres.
- The “Policy for Protection of Policyholder’s Interests” emphasizes on the below for the customers of the company:
 - All complaints, critical requests and issues raised by customers are dealt with courtesy and resolved on time.
 - The grievance redressal procedure is made available to the customers who can choose to opt for alternative remedies if they are not fully satisfied with the response or resolution to their complaint by the Company.
 - Customers encountering issues should contact us via our websites grievance section: <https://www.icicilombard.com/grievance-redressal> or our toll free no. 1800 2666 or email us at: customersupport@icicilombard.com. We have a dedicated desk for senior citizens, customers can email at seniorcitizencare@icicilombard.com.
 - If the issue persists, customer can contact us via our website’s grievance section: <https://www.icicilombard.com/grievance-redressal> following the escalation matrix mentioned below:
 - Step 2 - Deputy Vice President - Customer Support
 - Step 3 - Vice President - Customer Support and Grievance Redressal Officer.
 - International customers encountering issues can write to Complaint Redressal Officer (CRO) at iiogrievance@icicilombard.com and Complaints Redressal Appellate Officer at CRAO@icicilombard.com. These details are also available on our website’s grievance section: <https://www.icicilombard.com/grievance-redressal>

- Customers may use the Bima Bharosa portal (Grievance Redressal Portal) for escalating matters to IRDAI
- If the issue still remains unresolved, customers may approach the grievance officer and/or Insurance Ombudsman.
- The Company has adopted “Insurance Awareness Policy” and undertakes several initiatives for educating and enhancing insurance awareness amongst its customers, potential customers, and the public at large about the Company’s products along with their benefits and customer rights.
- The Company maintains confidentiality of policyholder’s information and does not disclose information to anyone unauthorized unless such disclosure is required by law and/or is required to be made to any statutory authorities or where the same may be necessitated in the ordinary and normal course of insurance business.

7. Environment Management:

The Company shall be aligned with national goals and targets while transitioning towards low carbon economy.

The Company shall minimise its environmental footprint by measuring and reducing the GHG emissions, waste generation, water consumption and the use of natural resources. The Company shall evaluate, explore and implement all opportunities of eco-friendly practices in its daily course of business. The Company will comply with local and national environmental regulations.

The Company recognizes the need to reduce waste, improve efficiency and reduce carbon footprint, and thus, will work towards integrating environmental factors in its procurement practices.

The Company shall make reasonable efforts to encourage procurement of products, in line with internally approved green procurement guidelines to the extent applicable, and shall endeavour to procure products that are:

- Recyclable / Reusable
- Environmentally friendly
- Energy efficient

Energy and Green House Gas (GHG) Emission Management: The Company shall strive to improve resource use efficiency and make efforts to increase the share of renewable energy in its operations, where feasible. These initiatives shall be aimed at:

- Measuring and reporting energy consumption

- Promoting activities that result in less energy consumption and emission
- Adopting energy efficient operating procedures
- Undertaking targets to reduce GHG emissions
- Periodic energy audits in key offices
- Annual assurance of GHG emissions

Water Management - The Company shall adopt water saving initiatives and promote practices to reduce its consumption levels.

Waste Management -The Company shall promote practices that help minimize waste generation and encourage proper segregation of waste categories, wherever practicable. The Company shall make efforts to ensure responsible waste disposal through authorized channels.

Creating Awareness and Employee Engagement - The Company understands that its stakeholders can play a major role in reducing the environmental impact. The Company shall engage and motivate employees to adopt environment friendly practices. The Company shall create awareness among employees and other stakeholders regarding various initiatives and services of the Company which have a positive impact on the environment. The Company shall communicate and engage with internal and external stakeholders on environmental issues arising due to its operations.

Adoption of Technology - The Company shall leverage technology to reduce environmental footprint in its business operations, including inter-alia investing in energy-efficient technologies, digitizing processes, switching to paperless processes and promoting use of virtual conferencing.

Monitoring and Reporting - The Company shall monitor, measure and report progress and performance of its environmental initiatives and communicate its approach and achievements to relevant stakeholders, wherever necessary. This shall also include the Company's environmental performance.

8. Human Capital Development:

The Company shall strive to foster an inclusive and people-oriented culture which encourages its employees to bring out their best. The Company shall constantly work towards creating a performance-driven work environment through various best practices and upskilling the workforce to constantly enhance their core capabilities making them agile and dynamic. The Company believes every successful business is an outcome of a productive and motivated workforce. The Company as a brand believes in Diversity, Equity & Inclusion (DE&I), extensive training and development

and continuous employee engagement for a healthy, safe and productive workplace where our workforce feels empowered.

- **Fair Employment Practices:** The Company shall pay great attention to ensure a healthy work environment with a strong focus on due-diligence with respect to human rights. Its business practices are aligned to uphold human rights across the operations with no discrimination on age, gender, religion, caste, language, ethnicity etc. As an equal opportunity employer, its focus remains to establish continuum of care for the agile workforce in an inclusive and safe environment. Through its employee benefits, it aims to create a culture of attracting talent and augmenting their organic growth. The Company shall prohibit forced, bonded and child labour and adhere to regulatory/statutory requirements of wages, working hours & conditions of work.
- **Employee Empowerment:** The Company believes in empowering its employees with employee feedback and suggestions solicited and implemented at the highest levels to help make tangible change in the organisation. The Company recognises the right to freedom of association of employees.
- **Employee Beneficial Policies:** The Company has an elaborate policy framework, comprising the policies that ensure safety and wellbeing of its employees. Through its employee benefits, the Company aims to create a culture of attracting talent and augmenting their organic growth. The Company aims to provide an environment where our employee's needs are fairly addressed.
- **Grievance Redressal:** The Company has a well-placed process for addressing employee grievances with utmost sensitivity and confidentiality and without fear of retaliation. The organization has a robust Whistle Blower (WB) policy in place which provides all employees an option and opportunity to raise any issues / grievances anonymously, where the identity of the whistle blower is kept confidential. The Company also has a policy against sexual harassment wherein each reported case of sexual harassment is investigated and resolved strictly as per procedure laid down in the Sexual Harassment at the Workplace (Prevention, Prohibition and Redressal Act, 2013). The Company's approach will be to remain focused on creating awareness about POSH amongst employees and prevention through proactive measures.
- **Diversity, Equity & Inclusion (DE&I):** The Company will strive to create an inclusive workplace where it aims to leverage the diverse backgrounds of its employees to

strengthen its workforce and business relationships. The Company will ensure that no individual is treated differently or discriminated on basis of gender, race, socioeconomic status, age, marital status, language, religion, political affiliation, nationality, appearance, physical and mental disability, or other reasons. The Company will foster a safe work environment for all employees including women employees in office locations and during work-related transit. Strengthening Diversity, Equity and Inclusion in the workplace has been a focus area. The Company's commitment towards DE&I extends to its stakeholders including suppliers, customers, vendors and partners.

- **Employee Code of Conduct:** The Company has mechanisms to deal with issues related to any form of abuse, including mental & physical harassment which is guided by the principles laid down in our Employees Code of Conduct, an internal document available to and accepted by all employees. This document also defines good corporate practices, financial transactions & personal account dealings and professional code along with management practices to promote a culture of integrity and ethics amongst employees.
- **Employee Health & Safety:** Health, safety and well-being of employees shall be a priority at the Company. The Company aims to continuously update its systems, policies, and processes to adapt to the evolving work environment. It will adhere to all applicable laws and regulations and maintain the utmost precaution and preventive measures across all the operating locations. The Company shall also place equal importance in maintaining the emotional well-being of our employees and have an Employee Assistance Program which provides 24 / 7 counselling services to its employees with access to expert psychologists. In addition, the Company shall also have policies in place to meet life-stage needs of employees including Maternity Leave, Child Care Leave, Paternity Leave, Adoption Leave, Fertility Leave, etc. Health Insurance coverage is provided to all employees & their families.
- **Employee Volunteering:** In the spirit of giving back to the communities the Company will encourage employees to participate in activities uplifting their respective communities.
- **Employee Training & Development:** The Company's Learning and development strategy envisages "Igniting a culture where learning is the catalyst for growth by equipping employees to succeed now & in the future by leveraging the Power of Many (Teams & Culture) and driving the Potential of One (Individual Excellence)."

The Company's learning and development initiatives are aligned to the Company's objectives and are focused on addressing internal capability gaps, as well as, facilitating the employee's professional development. Programs are designed around building capabilities at an individual, team and enterprise-level to meet immediate needs as well as improving future readiness.

- Succession Planning: The Company has a robust succession planning mechanism to build the leadership pipeline, with priority given to grooming and developing talent internally. It involves grooming the identified talent pool for senior positions so that they can improve their readiness for the identified roles and reviewing them annually.

V. Stakeholder Engagement and Accountability

The Company believes in maintaining a transparent relationship with its stakeholders and holds regular interactions with them, including investors, employees, customers and regulators. The Company will seek to enhance its practices and disclosures on ESG, with a focus on the material topics identified by stakeholders, on an ongoing basis. The senior management of the Company and designated employees will undergo training on ESG policy on a periodic basis.

VI. Policy Review

The Policy shall be reviewed by the Board of Directors annually pursuant to change in law which would affect the areas covered in this Policy or at least on an annual basis.