



**ONEIL**  
**Team**

***Moving Forward Together with  
Care and Commitment***

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# **BUSINESS RESPONSIBILITY & SUSTAINABILITY REPORT CORE**

An orange L-shaped graphic element consisting of a horizontal line extending to the right from the top of the text, and a vertical line extending downwards from the end of the horizontal line, forming a corner bracket around the right side of the text.

## BRSR CORE KEY PERFORMANCE INDICATORS (KPI'S)

| Sr. No. | Attribute  | Parameter  | Measurement / Unit  | FY2024     | FY2023     | Cross – reference to the BRSR                   |
|---------|--|--|---|------------|------------|---|
| 1       | <b>Green-house gas (GHG) footprint</b><br>Greenhouse gas emissions may be measured in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard | Total Scope 1 emissions  | Metric tonnes of CO <sub>2</sub> equivalent   | 907.22     | 867.80     | Principle 6, Question 7 of Essential Indicators |
|         |  | Total Scope 2 emissions  | Metric tonnes of CO <sub>2</sub> equivalent   | 6,958.17   | 6,480.44   | Principle 6, Question 7 of Essential Indicators |
|         |  | GHG Emission Intensity (Scope 1 +2)  | Total Scope 1 and Scope 2 emissions (MTCO <sub>2</sub> e) / GJ / Million turnover in USD adjusted for PPP | 0.70       | 0.77       | Principle 6, Question 7 of Essential Indicators |
|         |  |  | MTCO <sub>2</sub> e / Headcount   | 0.52       | 0.51       |   |
| 2       | <b>Water Footprint</b>   | Water consumption from<br>(i) Surface water Mn Lt / KL<br>1. Input water flow meter logs (Calibrated Meters)<br>2. Third Party Invoices / Quantity Certification<br>(ii) Groundwater<br>(iii) Third party water<br>(iv) Seawater / desalinated water<br>(v) Others | Kilo Litres   | -          | -          | Principle 6, Question 3 of Essential Indicators |
|         |  | Total volume of water consumption  | Kilo Litres   | -          | -          |   |
|         |  | Water consumption intensity  | Mn Lt or KL / Million turnover in USD adjusted for PPP  | -          | -          | Principle 6, Question 3 of Essential Indicators |
|         |  |  | Mn Lt or KL / Product or Service  | -          | -          |   |
|         |  | Water Discharge by levels of Treatment and destination<br>(i) Surface water<br>(ii) Groundwater<br>(iii) Seawater<br>(iv) Sent to third parties / No treatment<br>(v) Others   | Mn Lt or KL   | 159,787.40 | 141,466.46 | Principle 6, Question 4 of Essential Indicators |
|         |  |  |   |            |            |   |
| 3       | <b>Energy footprint</b>  | Total energy consumed  | GJ  | 43,119.54  | 37,409.23  | Principle 6, Question 1 of Essential Indicators |
|         |  | % of energy consumed from renewable sources  | In % terms  | 26.1       | 20.1       |   |
|         |  | Energy intensity   | GJ / Million turnover in USD adjusted for PPP   | 3.85       | 3.93       | Principle 6, Question 1 of Essential Indicators |
|         |  |  | GJ / Headcount  | 2.88       | 2.59       |   |

| Sr. No. | Attribute  | Parameter  | Measurement / Unit  | FY2024                | FY2023                | Cross – reference to the BRSR                      |
|---------|--|--|---|-----------------------|-----------------------|--|
| 4       | <b>Embracing circularity-details related to waste management by the entity</b> | Plastic waste (A)  | MT  | Not Applicable        | Not Applicable        | Principle 6, Question 9 of Essential Indicators    |
|         |  | E-waste (B)  | MT  | 21.40                 | 27.03                 | Principle 6, Question 9 of Essential Indicators    |
|         |  | Bio-medical waste (C)  | MT  | Not Applicable        | Not Applicable        | Principle 6, Question 9 of Essential Indicators    |
|         |  | Construction and demolition waste (D)  | MT  | Not Applicable        | Not Applicable        | Principle 6, Question 9 of Essential Indicators    |
|         |  | Battery waste (E)  | MT  | 17.52                 | 19.23                 | Principle 6, Question 9 of Essential Indicators    |
|         |  | Radioactive waste (F)  | MT  | Not Applicable        | Not Applicable        | Principle 6, Question 9 of Essential Indicators    |
|         |  | Other Hazardous waste. Please specify, if any (G)  | MT  | Not Applicable        | Not Applicable        | Principle 6, Question 9 of Essential Indicators    |
|         |  | Other Non-hazardous waste generated (H). Please specify, if any. (Paper waste and Sanitary waste)                        | MT  | 50.84                 | 52.27                 | Principle 6, Question 9 of Essential Indicators    |
|         |  | Total waste generated (A+B + C + D + E + F + G + H)  | MT  | 89.76                 | 98.53                 | Principle 6, Question 9 of Essential Indicators    |
|         |  | Waste intensity  | MT / Billion turnover in USD adjusted for PPP                                 | 8.02                  | 10.36                 | Principle 6, Question 9 of Essential Indicators    |
|         |  |  | MT / Headcount  | 0.01                  | 0.01                  | Principle 6, Question 9 of Essential Indicators    |
|         |  | Each category of waste generated, total waste recovered through recycling, re-using or other recovery operations         | MT  |                       |                       | Principle 6, Question 9 of Essential Indicators    |
|         |  | <ul style="list-style-type: none"> <li>Recycled</li> <li>Reused</li> <li>Other recovery operations</li> </ul>            |   | 68.90<br>0.00<br>0.00 | 49.55<br>0.00<br>0.00 |  |
|         |  | For each category of waste generated, total waste disposed by nature of disposal method                                  | Kg or MT  |                       |                       |  |
| 5       | <b>Enhancing Employee Wellbeing and Safety</b>                                 | a. Spending on measures towards well-being of employees and workers–cost incurred as a % of total revenue of the company | In % terms  | 0.2                   | 0.2                   | Principle 3, Question 1(c) of Essential Indicators |
|         |  | b. Details of safety related incidents for employees and workers   | Number of Permanent Disabilities  | 0                     | 0                     | Principle 3, Question 11 of Essential Indicators   |
|         |  |  | Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | 0.0                   | 0.0                   | Principle 3, Question 11 of Essential Indicators   |
|         |  |  | No. of fatalities   | 0                     | 0                     | Principle 3, Question 11 of Essential Indicators   |
| 6       | <b>Enabling Gender Diversity in Business</b>                                   | a. Gross wages paid to females as % of wages paid  | In % terms  | 19.2                  | 16.2                  | Principle 5, Question 3(b) of Essential Indicators |
|         |  | b. Complaints on POSH  | Total Complaints on Sexual Harassment (POSH) reported                         | 12                    | 6                     | Principle 5, Question 7 of Essential Indicators    |
|         |  |  | Complaints on POSH as a % of female employees / workers                       | 0.3                   | 0.2                   |  |
|         |  |  | Complaints on POSH upheld   | 11                    | 6                     |  |

| Sr. No. | Attribute  | Parameter  | Measurement / Unit  | FY2024         | FY2023         | Cross – reference to the BRSR                   |
|---------|--|--|---|----------------|----------------|---|
| 7       | <b>Enabling Inclusive Development</b>                    | a. Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India        | In % terms – As % of total purchases by value   | 9.5            | 10.6           | Principle 8, Question 4 of Essential Indicators |
|         |  | b. Job creation in smaller towns – Wages paid to people employed in smaller towns (permanent or non-permanent / on contract) as % of total wage cost | In % terms – As % of total wage cost  |                |                | Principle 8, Question 5 of Essential Indicators |
|         |  | <b>Location</b>  |   |                |                |   |
|         |  | Rural  |   | 0.1            | 0.2            |   |
|         |  | Semi-urban   |   | 6.3            | 6.5            |   |
|         |  | Urban  |   | 22.8           | 22.9           |   |
|         |  | Metropolitan   |   | 70.8           | 70.4           |   |
| 8       | <b>Fairness in Engaging with Customers and Suppliers</b> | Instances involving loss / breach of data of customers as a percentage of total data breaches or cyber security events                               | In % terms  | 0.0            | 0.0            | Principle 9, Question 7 of Essential Indicators |
|         |  | Number of days of accounts payable   | (Accounts payable *365) / Cost of goods /services procured  | 93             | 103            | Principle 1, Question 8 of Essential Indicators |
| 9       | <b>Open-ness of business</b>                             | Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties      | Purchases from trading houses as % of total purchases   | Not Applicable | Not Applicable | Principle 1, Question 9 of Essential Indicators |
|         |  |  | Number of trading houses where purchases are made from  |                |                |   |
|         |  |  | Purchases from top 10 trading houses as % of total purchases from trading houses  |                |                |   |
|         |  |  | Sales to dealers / distributors as % of total sales   | Not Applicable | Not Applicable |   |
|         |  |  | Number of dealers / distributors to whom sales are made Sales to top 10 dealers /distributors as % of total sales to dealers / distributors | Not Applicable | Not Applicable |   |
|         |  |  | <b>Share of RPTs (as respective % age) in-</b>  |                |                |   |
|         |  |  | Purchases   | 2.5            | 2.5            |   |
|         |  |  | Sales   | 1.1            | 1.1            |   |
|         |  |  | Loans & advances  | -              | -              |   |
|         |  |  | <b>Investments</b>  |                |                |   |
|         |  |  | Purchases   | 0.4            | 0.6            |   |
|         |  |  | Sales   | 0.0            | 0.0            |   |

**NOTES:****Attribute 1: Green-house gas (GHG) footprint**

- The company has employed "Operational Control Approach" denoting that activities only which are under the operating control of the company have been considered.
- Intensity ratios are computed based on the year-end employee count.

**Attribute 2: Water footprint**

- Water withdrawn by the Company is reported based on Central Ground Water Authority's (CGWA) daily average water requirements for offices, excluding 1 Work-From-Home Day per week for eligible employees, and calculated basis normal working calendar and working hours of the company. The Company has not assessed / disclosed any other water withdrawn / discharged for FY2024.
- Intensity ratios are computed based on the year-end employee count.
- All withdrawn water as reported is considered to be sourced through Other Sources (Others - Government Water Supply) as well as considered as fully discharged to third parties as untreated owing to the nature of business.

**Attribute 3: Energy footprint**

- The company has employed "Operational Control Approach" denoting that activities only which are under the operating control of the Company have been considered.
- Intensity ratios are computed based on the year-end employee count.

**Attribute 4: Embracing circularity - details related to waste management by the entity**

- Waste generated within the company's operational boundary is included in above data.
- Indicative weights derived from product specifications are used to estimate weight for known quantities.
- Construction and Demolition (C&D) Waste & Plastic Waste: Considered as Not applicable. The company does not have construction or remodelling activities as part of services provided and does not encourage single-use plastics in the premises.
- Intensity ratios are computed based on the year-end employee count.
- The Company has established protocols to ensure the safe disposal of waste to third party.
- Paper waste is calculated based on the quantity of printing paper purchased and recycled during service, excluding non-printing paper wastes.
- Sanitary waste data includes figures from branches where the Company has recycling agreements with third parties.
- All other waste not recycled or incinerated is considered to be sent to landfills.

**Attribute 5: Enhancing Employee Wellbeing and Safety****Attribute 5a:**

- The disclosures are made for permanent employees at fixed contracted Cost-to-Company excluding variables, bonuses, PF and other retiral benefits.
- Benefits paid for sick leaves are not considered for reporting.

**Attribute 5b:**

- LTIFR includes only work-related injuries, disabilities, and deaths and excludes ill-health.
- The disclosures are made for permanent employees.

**Attribute 6: Enabling Gender Diversity in Business****Attribute 6a:**

- Gross wages paid considers fixed contracted Cost-to-Company (with proportionate adjustment for new joiner and resigned employees during financial year) excluding variable pay, bonuses, stock options and other perquisites.

**Attribute 6b:**

- Number of POSH complaints received is reported in relation to the number of female employees at the end of the year.
- Complaints on POSH upheld excludes complaints which were reported during FY2024 and were pending for disposal at year end and includes 2 complaints which were pending for disposal on the first day of the year and are upheld during the year.

**Attribute 7: Enabling Inclusive Development****Attribute 7a:**

- The calculations are derived considering payments made during the year including payment for GST netted off with TDS deducted under Income Tax Act.
- Payment made towards reinsurance ceding, reinsurance inward commission and claim loss adjustment expenses are not considered as purchases in reporting.
- Commission payment for direct business does not include payment for GST and is considered without any impact of TDS deducted under Income Tax Act.
- Identification of MSME of vendors is based on information available with the Company.

**Attribute 7b:**

Wages paid considers fixed contracted Cost-to-Company (with proportionate adjustment for new joiner and resigned employees during financial year) excluding variable pay, bonuses, stock options and other perks.

**Attribute 8: Fairness in Engaging with Customers and Suppliers****Attribute 8b:**

- Above disclosure does not include Capital expenditure, Claims cost other than Loss Assessment expense, Reinsurance inward commission and Reinsurance Ceding business as Input material sourced.
- Accounts payable balance as on March 31, 2024, are considered for calculation.

**Attribute 9: Open-ness of business****Attribute 9a & 9b:**

- ICICI Lombard, being an insurance provider, purchases of raw materials from trading houses and sales of products to dealers/distributors is not applicable given the nature of the business. Sale of insurance policies through intermediaries are not considered for reporting.

**Attribute 9c:**

- Purchases include Commission expenses including RI Inward commission and Operating Expenses related to insurance business.
- Sales include Direct Business, RI Inward Premium and other income but excludes Investment Income.

## SECTION A: GENERAL DISCLOSURES

### I. DETAILS OF THE LISTED ENTITY

1. **Corporate Identity Number (CIN) of the Listed Entity:** L67200MH2000PLC129408
2. **Name of the Listed Entity:** ICICI Lombard General Insurance Company Limited
3. **Year of incorporation:** October 30, 2000
4. **Registered office address:** ICICI Lombard General Insurance Company Limited, ICICI Lombard House, 414, Veer Savarkar Marg, Near Siddhi Vinayak Temple, Prabhadevi, Mumbai - 400 025
5. **Corporate address:** ICICI Lombard General Insurance Company Limited, ICICI Lombard House, 414, Veer Savarkar Marg, Near Siddhi Vinayak Temple, Prabhadevi, Mumbai - 400 025
6. **E-mail:** [esg@icicilombard.com](mailto:esg@icicilombard.com)
7. **Telephone:** +91-22-6196 2300  
+91-22-6196 2304
8. **Website:** [www.icicilombard.com](http://www.icicilombard.com)
9. **Financial year for which reporting is being done:** FY2024
10. **Name of the Stock Exchange(s) where shares are listed:** BSE Limited (BSE) and National Stock Exchange of India Limited(NSE)
11. **Paid-up Capital:** ₹ 4.93 billion (as on March 31, 2024)
12. **Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:** Anckur Anil Kanwar  
Designation: Deputy CFO, Head of Investor Relations and Re-insurance  
Telephone Number – +91-22-6196 1918  
E-mail address – [anckur.anilkanwar@icicilombard.com](mailto:anckur.anilkanwar@icicilombard.com)
13. **Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken together):** Disclosures made in this report are on a standalone basis.
14. **Name of assurance provider:** PKF Sridhar & Santhanam LLP
15. **Type of assurance obtained:** Independent Reasonable Assurance for BRSR Core attributes for FY2024

### II. PRODUCT/SERVICES

#### 16. Details of business activities (accounting for 90% of the turnover):

| S. No. | Description of Main Activity     | Description of Business Activity              | % of Turnover of the Entity |
|--------|----------------------------------|---|-----------------------------|
| 1      | Financial and Insurance services | Non-life Insurance and Reinsurance activities | 100.0%                      |

#### 17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

| S. No. | Product/Service    | NIC Code | % of total Turnover contributed |
|--------|--------------------|----------|---------------------------------|
| 1      | Non-Life Insurance | 65120    | 100.0%                          |



### III. OPERATIONS

#### 18. Number of locations where plants and/or operations/offices of the entity are situated:

| Location      | Number of Plants | Number of Offices                     | Total                                 |
|---------------|------------------|---------------------------------------|---------------------------------------|
| National      | Not Applicable   | Branches: 312<br>Virtual Offices: 917 | Branches: 312<br>Virtual Offices: 917 |
| International | Not Applicable   | Not Applicable                        | Not Applicable                        |

#### 19. Markets served by the entity

##### a. Number of locations

| Locations                        | Number                                   |
|----------------------------------|--|
| National (No. of States)         | 37* (No. of. States: 28 & No. of. UT: 9) |
| International (No. of Countries) | Not Applicable                           |

\* 37 includes 28 states and 9 union territories

##### b. What is the contribution of exports as a percentage of the total turnover of the entity?

Not Applicable

##### c. A brief on types of customers

| Corporate Customers  | Government & Rural Business   | Retail Customers  |
|--|---|---|
| Provides integrated solutions to corporates, small, micro and medium enterprises. The range of insurance solutions offered include Fire, Marine, Engineering, Liability solutions, Employee Group Insurance. | Provides insurance solutions to State and Central governments or government owned enterprises and rural customers. The range of insurance solutions offered include Crop, Cattle, Weather, Mass Health, Personal Accident, Motor Insurance. | Provides insurance solutions to individuals and small / medium enterprises through multiple channels such as Agents, Brokers, Bancassurance, Tele-Sales, Direct Alliances, Motor Insurance Service Providers (MISPs) and Online Platforms. Health, Home, Motor, Travel, Personal Accident, Cyber Insurance. |

### IV. EMPLOYEES

#### 20. Details as at the end of financial year:

##### a. Employees and workers (including differently abled):

| S. No.    | Particulars              | Total (A)      | Male    |         | Female  |         |
|-----------|--------------------------|----------------|---------|---------|---------|---------|
|           |                          |                | No. (B) | % (B/A) | No. (C) | % (C/A) |
| EMPLOYEES |                          |                |         |         |         |         |
| 1.        | Permanent(D)             | 13,670         | 10,386  | 76.0%   | 3,284   | 24.0%   |
| 2.        | Other than Permanent (E) | 1,326          | 782     | 59.0%   | 544     | 41.0%   |
| 3.        | Total employees (D+E)    | 14,996         | 11,168  | 74.5%   | 3,828   | 25.5%   |
| WORKERS   |                          |                |         |         |         |         |
| 4.        | Permanent(F)             | Not Applicable |         |         |         |         |
| 5.        | Other than Permanent (G) |                |         |         |         |         |
| 6.        | Total workers (F+G)      |                |         |         |         |         |

**b. Differently abled Employees and workers:**

| S. No.                      | Particulars                             | Total (A)      | Male    |                | Female  |                |
|-----------------------------|---|----------------|---------|----------------|---------|----------------|
|                             |   |                | No. (B) | % (B/A)        | No. (C) | % (C/A)        |
| DIFFERENTLY ABLED EMPLOYEES |   |                |         |                |         |                |
| 1.                          | Permanent (D)                           | 13             | 10      | 76.9%          | 3       | 23.1%          |
| 2.                          | Other than Permanent (E)                | None           | None    | Not Applicable | None    | Not Applicable |
| 3.                          | Total differently abled employees (D+E) | 13             | 10      | 76.9%          | 3       | 23.1%          |
| DIFFERENTLY ABLED WORKERS   |   |                |         |                |         |                |
| 4.                          | Permanent (F)                           | Not Applicable |         |                |         |                |
| 5.                          | Other than Permanent (G)                |                |         |                |         |                |
| 6.                          | Total differently abled workers (F+G)   |                |         |                |         |                |

**21. Participation/Inclusion/Representation of women as on March 31, 2024:**

|                                       | Total (A) | Number and percentage of Females |                |
|---------------------------------------|-----------|----------------------------------|----------------|
|                                       |           | No. (B)                          | % (B/A)        |
| Board of Directors                    | 11        | 1                                | 9.1%           |
| Key Management Personnel <sup>#</sup> | 4         | None                             | Not Applicable |

<sup>#</sup>Key Managerial Personnel, as specified in Section 203 of the Companies Act 2013, includes Managing Director & Chief Executive Officer, Whole-time Directors, Chief Financial Officer and Company Secretary.

**22. Turnover rate for permanent employees and workers:**

**(Disclose trends for the past 3 years)**

|  | FY 2024        |        |       | FY 2023 |        |       | FY 2022 |        |       |
|--|----------------|--------|-------|---------|--------|-------|---------|--------|-------|
|  | Male           | Female | Total | Male    | Female | Total | Male    | Female | Total |
| Turnover (excluding Call Centre employees) | 27.3%          | 33.4%  | 28.5% | 35.1%   | 33.7%  | 33.9% | 34.9%   | 29.5%  | 30.3% |
| Turnover (over all)                        | 31.4%          | 47.8%  | 35.2% | 53.4%   | 38.5%  | 41.5% | 43.8%   | 33.5%  | 35.4% |
| Permanent Workers                          | Not Applicable |        |       |         |        |       |         |        |       |

**Notes:**

- The Company does not employ or engage with 'worker', as defined in the guidance note on BRSR, issued by SEBI.
- ICICI Lombard has an in-house call centre which is a unique scenario in GI industry where typically the same is outsourced. As such the turnover ratios in ICICI Lombard are reported at an overall and without call centres, given the higher turnover rate in call centre industry.

**V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)**
**23. a. Names of holding/ subsidiary/ associate companies/ joint ventures**

| S. No. | Name of the holding / subsidiary / associate companies / joint ventures (A) | Indicate whether holding/ Subsidiary/ Associate/ Joint Venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|--------|---|--|-----------------------------------|--|
| 1      | ICICI Bank Limited*   | Holding Company  | 51.27%                            | No   |

\* The Company has become a subsidiary of ICICI Bank Limited on February 29, 2024, pursuant to purchase of equity shares of the Company by ICICI Bank Limited through the stock exchange mechanism.

**VI. CSR DETAILS**
**24. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: Yes**

**(ii) Turnover (Gross Written Premium) (in ₹): ₹ 255.94 billion**

**(iii) Net worth (in ₹): ₹ 119.60 billion**

**(iv) Total amount spent on CSR for FY2024: ₹ 370.4 million**

## VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES

### 25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No)  | FY2024                                     |  |   | FY2023                                     |  |  |
|---|--|--|--|---|--|--|--|
|   | (If Yes, then provide web-link for grievance redress policy)   | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks   | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks  |
| Communities                                       | Yes  | None                                       | None   | None  | None                                       | None   | None   |
| Investors (other than shareholders)*              | Yes<br><a href="https://www.icicilombard.com/docs/default-source/policies-of-the-company/sop-for-redressal-of-investor-grievances.pdf">https://www.icicilombard.com/docs/default-source/policies-of-the-company/sop-for-redressal-of-investor-grievances.pdf</a>   | None                                       | None   | None  | None                                       | None   | None   |
| Shareholders*                                     | Yes<br><a href="https://www.icicilombard.com/docs/default-source/policies-of-the-company/sop-for-redressal-of-investor-grievances.pdf">https://www.icicilombard.com/docs/default-source/policies-of-the-company/sop-for-redressal-of-investor-grievances.pdf</a>   | None                                       | None   | None  | None                                       | None   | None   |
| Employees   |  |  |  |   |  |  |  |
| • Sexual Harassment                               | Yes<br><a href="https://www.icicilombard.com/docs/default-source/policies-of-the-company/guidelines_against_sexual_harassment_il_ver22.pdf?sfvrsn=39fd6b1f_">https://www.icicilombard.com/docs/default-source/policies-of-the-company/guidelines_against_sexual_harassment_il_ver22.pdf?sfvrsn=39fd6b1f_</a> | 12   | 2  | All the complaints were satisfactorily resolved in FY2024   | 6  | 2  | The pending complaints were satisfactorily resolved after FY2023                 |
| • Anti-fraud                                      | Yes  | 256  | 45   | As on the date of filing BRSR, these cases are under investigation and will be closed in the subsequent quarter | 210  | 16   | All 16 complaints were subsequently closed                                       |
| Customers   | Yes<br><a href="https://www.icicilombard.com/docs/default-source/default-document-library/policy-for-protection-of-policyholder.pdf?sfvrsn=2">https://www.icicilombard.com/docs/default-source/default-document-library/policy-for-protection-of-policyholder.pdf?sfvrsn=2</a>                               | 5,343                                      | 149  | All the pending complaints were satisfactorily resolved after the financial year                                | 4,917                                      | 176  | All the pending complaints were satisfactorily resolved after the financial year |
| Value Chain Partners                              | Yes<br><a href="https://www.icicilombard.com/docs/default-source/policies-of-the-company/icici-lombard-suppliers-code-of-conduct.pdf?sfvrsn=39fd6bcd_5">https://www.icicilombard.com/docs/default-source/policies-of-the-company/icici-lombard-suppliers-code-of-conduct.pdf?sfvrsn=39fd6bcd_5</a>           | None                                       | None   | None  | 2  | None   | The Company has resolved the complaints pending at the year end                  |
| Other (Whistle blower complaints)                 | Yes<br><a href="https://www.icicilombard.com/legal/whistle-blower-policy">https://www.icicilombard.com/legal/whistle-blower-policy</a>   | 9  | None   | All complaints have been investigated and closed  | 7  | None   | All complaints have been investigated and closed                                 |

Notes: ICICI Lombard has an internal mechanism available for grievance redressal for all of its stakeholders

\*During the period under review, no complaint was received through SEBI Scores portal/Stock Exchanges or any other regulator.

### 26. Overview of the entity's material responsible business conduct issues.

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format:

| S. No. | Material issue identified       | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity  | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications)  |
|--------|---------------------------------|--|---|--|---|
| 1      | Promoting Health and Well-being | Opportunity                                | Revamping the existing health products to meet the evolving customer needs in terms of wider health coverage at competitive pricing while promoting the importance of sustainable lifestyle which improves good health habits through behavioral changes. This is substantiated by market research for improvising the service offerings with respect to health insurance products. |  | Positive<br>New product development prospects with an objective of reaching to underserved segments. Coverage of these products can lead to favourable financial impacts for customers reducing financial burdens of the customers and increased retention for the business |

| S. No. | Material issue identified   | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity   | In case of risk, approach to adapt or mitigate   | Financial implications of the risk or opportunity (Indicate positive or negative implications)   |
|--------|-----------------------------|--|--|--|--|
| 2      | Innovation and Digitisation | Opportunity                                | Innovation and digital transformation creates value for both the organisation as well as for the customers and other stakeholders in offering diverse solutions for easier transactions improving the operational efficiency while responding to evolving consumer needs and grievances.                                       |  | Positive<br>New technologies offers great opportunities for addressing critical risks with increased operational efficiency and fosters new product/service development for enhancing customer experience and expanding the customer base.                       |
| 3      | Diversity and Inclusion     | Opportunity                                | Diversity is about the representation of workforce in the entity. Inclusion is about contributions, presence and perspectives of different groups of people are valued and integrated into the internal environment. This issue refers to the diversity and inclusion practices of ICICI Lombard and its value chain partners. |  | Positive<br>Diverse and wider pool of talents improves the workculture improving the productivity reducing the costs of retention/attrition and re-hiring  |
| 4      | Human Capital Development   | Opportunity                                | Human Capital Development intends to develop agile and productive workforce leading to overall business objectives promoting growth.   |  | Positive<br>Trained & skilled workforce creates a better customer experience and contributes to company's growth and objectives. Skill development of employees also assists in keeping the workforce aligned with the evolving risks and business opportunities |
| 5      | Economic Performance        | Opportunity                                | Economic performance refers to the contribution of ICICI Lombard's business to the local, regional, national and global economy and creating wealth for the stakeholders viz., community, employees, investors and shareholders.   |  | Positive<br>Improved access to products and services of the Company is critical to financial economy and has a positive impact for economic well-being of company and shareholders, employees, investors   |
| 6      | Responsible Investment      | Opportunity                                | Responsible investment is an approach to explicitly acknowledge the relevance of environmental, social and governance factors, in investment practices for responsible wealth generation and healthy portfolio in the long run countering the new challenges posed by climate change and regulatory requirements.              |  | Positive<br>ESG integration helps in addressing critical extra financial risks including regulatory, operational and reputational risks. It can create opportunities for developing thematic products which are in line with growing customer demand.            |
| 7      | Financial Inclusion         | Opportunity                                | Affordable insurance products to promote the access to finance over a wide range of customer base reaching bottom of pyramid mitigating the movement of individuals to societal strata which can enhance the financial protection in the events of unforeseen hardships.   |  | Positive<br>Access to insurance products and services leads to enhanced financial security of consumers, hence leading to increased demand of the products   |
| 8      | ESG Products and Services   | Opportunity                                | ESG-themed products and services include insurance solutions to stimulate decarbonised economy and promote the products which benefits the society.  |  | Positive<br>New product developments aligning to ESG related thematic areas will be a source of growth for the Company   |
| 9      | Climate Change Mitigation   | Risk                                       | Climate change related risks require the use and regular review of comprehensive framework to ensure it is properly addressed and applied. Adopting practices to mitigate, leading to increased risk capital requirements for responding to the financial losses incurred in case of such events.                              | Climate change risks and adaptation to the resulting impacts have been integral to the Company's risk management process for many years and its approach continues to grow with time. The Company will continue to align with underwriting and investment policies to adapt to the changing climate risk scenario and promote sustainable products | Negative<br>Robust mechanisms to capture and factor in climate risks assists the Company in appropriate pricing of its products  |
| 10     | Community Development       | Opportunity                                | Supporting community development programmes shall uphold the Company's brand image while promoting better quality of life for the beneficiaries  |  | Positive<br>The programmes of the Company intend to improve the focus on the community, and consumers leading to increased reputation of the brand   |

| S. No. | Material issue identified        | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk / opportunity  | In case of risk, approach to adapt or mitigate  | Financial implications of the risk or opportunity (Indicate positive or negative implications)   |
|--------|----------------------------------|--|---|---|--|
| 11     | Customer Relationship Management | Risk                                       | Customer Relationship is core for business for innovating products as per consumer and market needs while resolving grievances with low turnaround time, maintaining trust, continuity and relationship.  | ICICI Lombard's customer relations, product mis-selling and grievance handling mechanisms leading to customer attrition/dissatisfaction.  | Negative<br>Customer retention and deepening of client relationship is critical for client growth. Effective and responsive CRM creates customer engagement and uses feedback for improving products/experience                              |
| 12     | Talent Attraction and Retention  | Risk                                       | An organisational environment to attract and retain talent through improved mental physical well-being, equal opportunities, skill enhancement and employee benefits providing competitive edge.  | ICICI Lombard has diverse mechanisms to acquire and manage human talent across business operations  | Negative<br>Higher attrition rates leads to reduced efficiency and associated financial losses to the business   |
| 13     | Data Privacy and Security        | Risk                                       | Data Privacy and Security is the process of implementing measures and systems designed to securely protect and safeguard information and also implies that businesses should use private data only for the intended purposes.   | ICICI Lombard's practices will continue to prevent cyberattacks or failure of systems leading to loss of customer data and maintaining trust in processes are high priorities   | Negative<br>Data privacy has gained increased priority for the critical stakeholder groups like customers, regulators and investors for the Company. Any risks or breaches will pose significant financial losses for customers and business |
| 14     | Fair Workplace                   | Risk                                       | An inclusive workplace which promotes equal pay for equal work, protection from all kinds of discriminations and abiding by human rights practices.   | ICICI Lombard ensures strict adherence to policies and regulations to ensure equal pay for equal work, mitigating and preventing adverse human rights impacts linked to its business activities and operations including supply chain | Negative<br>Human rights issues are top priority for all stakeholders. Any violation can lead to litigation and reputational damages and penalties for the Company   |
| 15     | Operational Eco-Efficiency       | Risk                                       | Reducing environmental footprint of the Company in terms of carbon and waste intensity is essential for lowering the environmental footprint of business and ultimately reach Net-Zero levels in line with India's commitments reducing the consequences on society   | ICICI Lombard's business will focus on transitioning the operations to low environmental footprint in terms of carbon and waste intensity   | Negative<br>Reputational and regulatory risks leading to financial damages for the Company   |
| 16     | Risk Management                  | Risk                                       | Enterprise Risk Management is a process of identifying and managing potential risks including ESG risks within its risk appetite for providing reasonable assurance regarding the achievement of entity objectives  | ICICI Lombard's enterprise wide approach to risk management, is approved by Board of Directors that helps to identify potential material risks in a structured, systematic manner and actions to mitigate them                        | Negative<br>ERM and its oversight by the Board are very critical for identifying and addressing the potential risk which may have a significant impact   |
| 17     | Business Ethics                  | Risk                                       | Business ethics are necessary to ensure ethical business practices abiding by local and sectoral regulations while managing the interests of all the stakeholders aligning with global best practices based on human, cultural, economic, political and social rights and conducting business on accountable and transparent lines. | ICICI Lombard's corporate policies and codes form a key component of the governance framework guiding employees and other stakeholders across the value chain to uphold its commitment to ethics, transparency, and sustainability    | Negative<br>Ethical corporations will reduce the litigation and reputational damages and therefore the financial damages to the Company  |

## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

|    |  |
|----|--|
| P1 | Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.        |
| P2 | Businesses should provide goods and services in a manner that is sustainable and safe.   |
| P3 | Businesses should respect and promote the well-being of all employees, including those in their value chains.                        |
| P4 | Businesses should respect the interests of and be responsive to all its stakeholders.  |
| P5 | Businesses should respect and promote human rights.  |
| P6 | Businesses should respect and make efforts to protect and restore the environment.   |
| P7 | Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent. |
| P8 | Businesses should promote inclusive growth and equitable development.  |
| P9 | Businesses should engage with and provide value to their consumers in a responsible manner.  |

[illegible]

| Disclosure Questions   | P1   | P2   | P3   | P4   | P5   | P6   | P7   | P8   | P9  |
|--|--|--|--|--|--|--|--|--|---|
| 3. Do the enlisted policies extend to your value chain partners? (Yes/No)  | Yes  | Yes  | Yes  | Yes  | Yes  | Yes  | Yes  | Yes  | Yes   |
| 4. Name of the national and international codes/ certifications/ labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. | 1. Global Reporting Initiative Reporting Framework and SASB Guidance for ESG Disclosure<br>2. ISO 31000: 2018 Enterprise Risk Management<br>3. United Nations Sustainable Development Goals  | United Nations Sustainable Development Goals | United Nations Sustainable Development Goals | United Nations Sustainable Development Goals | United Nations Sustainable Development Goals | 1. Global Reporting Initiative Reporting Framework and SASB Guidance for ESG Disclosure<br>2. United Nations Sustainable Development Goals | United Nations Sustainable Development Goals | United Nations Sustainable Development Goals | 1. ISO 27001: 2013 Information Security Management System<br>2. ISO 27017: 2015 Cloud Computing Security Standard<br>3. United Nations Sustainable Development Goals<br>4. Bureau Veritas Quality International |
| 5. Specific commitments, goals and targets set by the entity with defined timelines, if any.   | <ul style="list-style-type: none"> <li>• Increase women representation in workforce to 25.0% by FY2025</li> <li>• Increase renewable energy sourcing to 25.0% by FY2025</li> </ul>   |  |  |  |  |  |  |  |   |
| 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.  | <ul style="list-style-type: none"> <li>• Women representation in workforce Women employee diversity stands at 24.0% marking a rise from 21.6% in FY 2023</li> <li>• 27.0% of energy requirements of the Company is met through renewable sources exceeding target of sourcing 25.0% of renewable energy by FY2025</li> </ul> |  |  |  |  |  |  |  |   |

#### Governance, leadership and oversight

|   |   |
|---|---|
| 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements (listed entity has flexibility regarding the placement of this disclosure) | <p><b>MD &amp; CEO's Message</b></p> <p><b>Dear Stakeholders,</b></p> <p>In an era marked by rapid change and increasing global challenges, ICICI Lombard's (The Company) role as a general insurer extends beyond providing financial security. With its 5th year of ESG-related disclosures, the Company has remained committed to its organisational ESG strategy which focuses on key material issues such as promoting health and well-being, sustainable underwriting, responsible investment, environmental stewardship, climate change mitigation, technological innovation and socio-economic development.</p> <p>As one of India's leading private general insurers, the Company is well-positioned to grow its business profitably, while supporting customers and local communities in times of need. While the Company's business model is intertwined with the sustainability objectives, the newly formulated ESG policy defines its approach towards material ESG issues.</p> <p><b>Sustainable insurance solutions</b></p> <p>The Company aims to reduce risk, develop innovative solutions and improve business performance, and contribute to environmental, social and economic sustainability. Towards this during the fiscal 2024, the Company continued to create capacities and develop insurance products that enable transition into a low-carbon economy, and ensure inclusiveness across a large spectrum of the society, i.e., SMEs, MSMEs, rural communities, and retail customers, amongst others.</p> <p>Consequently, the Company's Gross Direct Premium Income (GDPI) for the year ended March 31, 2024, grew by 17.8% to ₹ 247.76 billion, compared with ₹ 210.25 billion in FY2023. During the fiscal, the Company issued over 36.2 million policies covering 24.7 million lives and honoured 2.9 million claims. Of the total lives covered 12.1 million lives were covered in the rural sector and 6.0 million lives, were covered under the social sector encompassing marginalised communities.</p> <p>The Company's sustainable product suite includes holistic covers for solar/ wind insurance, electric vehicle insurance, insurance for age-fit vehicles, engineering, liability insurance and crop insurance, amongst others. - To illustrate better, the Company's growth momentum in EV insurance has been positive, with a market share of ~17.0% in private cars and ~28.0% in the two-wheeler segment for fiscal 2024. For fiscal 2024 EV insurance policy count grew 2x over last year.</p> <p>The Company also promotes products that reward the insured based on sustainable practices such as Pay as You Use (where the premium is decided on vehicle usage) and Pay How You Drive (where the premium is decided on safe driving behaviour), Sustainable agriculture and organic farming with incentivising climate-friendly cropping techniques and technology.</p> |
|---|---|

[illegible]



[illegible]

# 10. Details of review of NGRBCs by the Company:

| Subject for Review   | Indicate whether review was undertaken by Director/ Committee of the Board/ Any other Committee   |    |    |    |    |    |    |    |    |
|--|---|----|----|----|----|----|----|----|----|
|  | P1  | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| Performance against above policies and follow up action  | The Board, Committees of the Board, and Senior Management of the Company critically reviews all applicable policies. Furthermore, the Company conducts regular and timely reviews, along with audits, to align the policies with the evolving business dynamics and any changes in operating environment and regulatory requirements. |    |    |    |    |    |    |    |    |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances | ICICI Lombard ensures timely compliance with all statutory requirements.  |    |    |    |    |    |    |    |    |
|  | Frequency (Annually/ Half yearly/ Quarterly/ Any other-please specify)  |    |    |    |    |    |    |    |    |
|  | P1  | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| Performance against above policies and follow up action  | Annually / As and when required   |    |    |    |    |    |    |    |    |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances | Annually / As and when required   |    |    |    |    |    |    |    |    |

# 11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes provide name of the agency.

| P1  | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|----|----|----|----|----|----|----|----|
| No external assessment of policies were taken up. However the Company conducts regular internal audits and reviews of all policies and procedures. The Company ensures that the mechanisms for continuous improvement and feedback loops are established within the organisation. Through regular reviews and internal assessments, the Company fosters a culture of learning and adaptation to refine policies and practices over time . |    |    |    |    |    |    |    |    |
| From a best practices perspective as well as from a risk perspective, policies are periodically evaluated and updated by various business heads and approved by the Senior Management or Board.   |    |    |    |    |    |    |    |    |

# 12. If answer to question (1) above is "No" i.e., not all Principles are covered by a policy, reasons to be stated:

| Questions   | P1             | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|----------------|----|----|----|----|----|----|----|----|
| The entity does not consider the principles material to its business (Yes/No)   | Not Applicable |    |    |    |    |    |    |    |    |
| The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) |                |    |    |    |    |    |    |    |    |
| The entity does not have the financial or/human and technical resources available for the task (Yes/No)                         |                |    |    |    |    |    |    |    |    |
| It is planned to be done in the next financial year (Yes/No)  |                |    |    |    |    |    |    |    |    |
| Any other reason (please specify)   |                |    |    |    |    |    |    |    |    |

Some of the policies being internal documents are available to the employees through the Company's intranet namely:

1. Anti-Fraud Policy
2. Anti-Money Laundering Policy and Framework
3. Broker Empanelment Policy
4. Code of Conduct to Regulate, Monitor and Report Trading by its Designated Persons
5. Dealers Code of Conduct and Personnel Trading Guidelines
6. Information Security Policy and Cyber Security Policy

## SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

### PRINCIPLE 1

Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.



### ESSENTIAL INDICATORS

#### 1. Percentage coverage by training and awareness programmes on any of the principles during the financial year.

| Segment                           | Total number of training and awareness programmes held   | Topics / principles covered under the training and its impact  | %age of persons in respective category covered by the awareness programmes |
|-----------------------------------|--|--|--|
| Board of Directors                | <ol style="list-style-type: none"> <li>During the year, the Company had organised an onsite visit for Directors of the Company, to ICICI Academy for Skills. During the visit, the Directors were apprised on CSR activities including skill development; sustainable livelihood projects and other Sustainability projects undertaken by ICICI Foundation.</li> <li>During the year, the Company had also organised an awareness session by an external firm for the Board of Directors and Management, to understand about the critical areas of amendments/compliance requirements under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.</li> <li>The Induction programme was organised for the Director appointed during the year, wherein the Director was given an overview of the Company, its vision and mission, the industry in which it operates, its business, strategies, risk management, organisation structure and other areas of relevance.</li> <li>Various other presentations were made at the Board and Committee Meetings to familiarise the Board of Directors on the matters relating to the industry, business models, risk mitigation and management, governing regulations, ESG, information technology including cyber security and major developments related to the Company's performance.</li> <li>Additionally, the Company also update the Board of Directors on research analyst's reports covering various financial, operational and regulatory aspects, through circulation of quarterly analysts report to the Board post announcement of financial results. These reports are Company specific and provide useful information on the industry segment. Further, the Board Members were also apprised on other material matters through e-mail communications wherever required.</li> </ol> <p>The Board/Committee Meetings were attended by respective Committee Members and/or the Board of Directors. The Key Managerial Personnel and Senior Management of the Company were also part of the Board and Committee Meetings.</p> | <p>On an ongoing basis, the Board of Directors were familiarised through various awareness sessions on an array of issues pertaining to industry, business, regulations, economy, ESG, their roles, rights and responsibilities etc.</p> <p>In addition, as a part of quarterly Board and Committee Meetings, all the Board Members are also apprised on developments in the Company, key regulatory changes on the governance front i.e. guidelines/Regulations/Circulars issued by IRDAI, SEBI and MCA etc. The Key Managerial Personnel of the Company are also part of the Board and Committee Meetings wherein the above referred presentations are made.</p> <p>The details of the Familiarisation Programmes imparted to the Directors for FY2024 is also hosted on the Company's Website at <a href="https://www.icicilombard.com/docs/default-source/policies-of-the-company/familiarisation-programme-fy2024.pdf">https://www.icicilombard.com/docs/default-source/policies-of-the-company/familiarisation-programme-fy2024.pdf</a>.</p> | 100.0%   |
| Key Managerial Personnel          | 1  | People Leader - Program which talks about the CDI (CONNECT DEVELOP INSPIRE) framework  | 8.0%   |
| Employees other than BoD and KMPs | 72   | Product-theme covering different products/processes/initiatives, Cross Sell, Focuses on building execution excellence, understanding of team dynamics and building winning teams, Building capabilities around people management; communication; nurturing talent and collaboration on ESG topics  | 98.0%  |
| Workers                           | Not Applicable   | Not Applicable   | Not Applicable   |

2. Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

|                 | Monetary        |   |                   |  |  |
|-----------------|-----------------|---|-------------------|--|--|
|                 | NGRBC Principle | Name of the regulatory/ enforcement agencies/ judicial institutions | Amount (In INR)   | Brief of the Case                      | Has an appeal been preferred? (Yes/No) |
| Penalty/ Fine   | None            | None  | None              | None                                   | Not Applicable                         |
| Settlement      | None            | None  | None              | None                                   | Not Applicable                         |
| Compounding fee | None            | None  | None              | None                                   | Not Applicable                         |
|                 | Non-Monetary    |   |                   |  |  |
|                 | NGRBC Principle | Name of the regulatory/ enforcement agencies/ judicial institutions | Brief of the Case | Has an appeal been preferred? (Yes/No) |  |
| Imprisonment    | None            | None  | None              | Not Applicable                         |  |
| Punishment      | None            | None  | None              | Not Applicable                         |  |

3. Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.

| Case Details   | Name of the regulatory/ enforcement agencies/ judicial institutions |
|--|---|
| None – There were no cases accorded to the Entity or Directors/KMPs. |   |

4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a web-link to the policy.

The Company is dedicated to maintaining a culture of integrity and accountability through a comprehensive framework of policies and practices. Among these are Whistleblower Policy, Anti-Fraud Policy, Employee Code of Conduct, and Anti-Bribery and Anti-Corruption Policy.

The Company's Anti-Bribery & Anti-Corruption Policy aligns closely with legal requirements and regulatory guidelines, ensuring compliance with anti-bribery laws. Additionally, the Board has pre-approved an Anti-Fraud Policy, adhering to the guidelines set forth by IRDAI. This policy emphasises the proactive identification and mitigation of fraudulent activities while delineating necessary strategies and actions. As a part of fraud reporting mechanism, the Company has created the below mentioned tools wherein the internal stakeholders can report any fraudulent activity. The Anti-Bribery & Anti-Corruption Policy is hosted on website- [https://www.icicilombard.com/docs/default-source/policies-of-the-company/anti-bribery-and-anti-corrupcion-policy.pdf?sfvrsn=39fd6fa9\\_9](https://www.icicilombard.com/docs/default-source/policies-of-the-company/anti-bribery-and-anti-corrupcion-policy.pdf?sfvrsn=39fd6fa9_9)

a) Dedicated hotline has been setup at contact number: +91-70450 59059

b) Specific email ID - [fraudinfo@icicilombard.com](mailto:fraudinfo@icicilombard.com)

In adherence to statutory mandates, the Company has adopted an Employee Code of Conduct for both Directors and Employees, emphasising professional and ethical principles. The Company believes that adherence to these principles is fundamental to the Company's maintaining trust and integrity within the organisation.

The Whistleblower Policy, in accordance with the Companies Act of 2013 and its associated rules, provides a platform for employees to report any concerns through dedicated email channels without fear of reprisal. This policy underscores the Company's commitment to transparency and accountability.

ICICI Lombard, prioritises a culture of accountability, where adherence to policies and ethical standards is paramount. With a steadfast commitment to zero tolerance for misconduct, the Company strives to uphold the highest standards of integrity, ensuring the trust and confidence of its stakeholders.

**5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:**

|           | FY 2024        | FY 2023 |
|-----------|----------------|---------|
| Directors | None           | None    |
| KMPs      | None           | None    |
| Employees | None           | None    |
| Workers   | Not Applicable |         |

**6. Details of complaints with regard to conflict of interest:**

|  | FY 2024 |         | FY 2023 |         |
|--|---------|---------|---------|---------|
|  | Number  | Remarks | Number  | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | None    | None    | None    | None    |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs      | None    | None    | None    | None    |

**7. Provide details of any corrective action taken or underway on issues related to fines/ penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.**

During the reporting period, there have been no instances of conflicts of interest involving the Directors and KMPs.

**8. Number of days of accounts payables [(Accounts payable \*365) / Cost of goods/services procured] in the following format:**

|                                     | FY 2024 | FY 2023 |
|-------------------------------------|---------|---------|
| Number of days of accounts payables | 93      | 104     |

Notes:

- Above disclosure does not include Capital expenditure, Claims cost other than Loss Assessment expense, Reinsurance Inward commission and Reinsurance Ceding business as Input material sourced.
- Accounts payable balance as on March 31, 2024, are considered for calculation.

**9. Open-ness of business**

Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:

| Parameter                         | Metrics  | FY 2024        | FY 2023        |
|-----------------------------------|--|----------------|----------------|
| <b>Concentration of Purchases</b> | a. Purchases from trading houses as % of total purchases                                 | Not Applicable | Not Applicable |
|                                   | b. Number of trading houses where purchases are made from                                | Not Applicable | Not Applicable |
|                                   | c. Purchases from top 10 trading houses as % of total purchases from trading houses      | Not Applicable | Not Applicable |
| <b>Concentration of Sales</b>     | a. Sales to dealers/ distributors as % of total sales                                    | Not Applicable | Not Applicable |
|                                   | b. Number of dealers/ distributors to whom sales are made                                | Not Applicable | Not Applicable |
|                                   | c. Sales to top 10 dealers/ distributors as % of total sales to dealers/ distributors    | Not Applicable | Not Applicable |
| <b>Share of RPTs in</b>           | a. Purchases (Purchases with related parties/ Total Purchases)                           | 2.5%           | 2.5%           |
|                                   | b. Sales (Sales to related parties/ Total Sales)   | 1.1%           | 1.1%           |
|                                   | c. Loans & advances (Loans & advances given to related parties / Total loans & advances) | -              | -              |
|                                   | d. Investments (Investments in related parties/ Total Investments made)                  |                |                |
|                                   | Purchase   | 0.4%           | 0.6%           |
|                                   | Sales  | 0.0%           | 0.0%           |

Notes:

- ICICI Lombard, being an insurance provider, purchases of raw materials from trading houses and sales of products to dealers/distributors is not applicable given the nature of the business. Sale of insurance policies through intermediaries are not considered for reporting.
- Purchases include Commission expenses including RI Inward commission and Operating Expenses related to insurance business.
- Sales include Direct Business, RI Inward Premium and other income but excludes Investment Income.

## LEADERSHIP INDICATORS

### 1. Awareness programmes conducted for value chain partners on any of the principles during the financial year:

| Total number of awareness programmes held | Topics / principles covered under the training   | % age of value chain partners covered (by value of business done with such partners) under the awareness programmes |
|---|--|---|
| 4   | Supplier Code of Conduct trainings are conducted in FY 2024. Environmental topics include Compliance, sustainable business practices, information and cyber security, environmental disclosures, Social include Health & Safety, Human Rights, Diversity, Equity and Inclusiveness. Other topics like anti-corruption and anti-bribery were also a part of these trainings | These training programs are open for all material suppliers along with internal business teams.*                    |
| ~7,782                                    | Training to agents on topics like growing need for insurance solutions, products and services of IL, processes from customer onboarding and faster claim settlement.   | ~96,533 agents empowered**  |

\*57 Material suppliers participated in this training program

\*\* Total agent attendance

The Company has adopted Supplier Code of Conduct has which summarises the standards of business conduct that must guide the actions of the suppliers. The Code are set of guidelines drawn from ethos, values of the Company and also spans around ESG guidelines. The Company expects its suppliers to observe highest standards of integrity, honesty, fairness, discipline, decorum and ethical conduct while working for the Company as well as while representing the Company as stipulated by the Code. Key areas addressed in this code include Health and Safety, Working Conditions, Human Rights, Compliance, and Ethical Business Conduct.

ICICI Lombard conducts security awareness training programs to raise awareness among the value chain partners, including customers, on topics such as digital security to prevent fraudulent activities. The Company also conduct engagement sessions across channel partners, including brokers, corporate agents, and individual agents, to discuss new products and services, as well as other topics of interest. These training sessions include topics such as new products and services, financial literacy, and risk management. ICICI Lombard's efforts to raise awareness among the value chain partners are essential for the successful conduct of business operations.

The Company conducts periodic training for agents through exclusive programs like IL Engage Session, Bandhan Program, Milan, Health Shiksha programs, and vertical-wise programs to apprise stakeholders on topics like basics of insurance, products and services of IL, rewards and recognition for agents, and processes from customer onboarding and claim settlement.

### 2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/ No). If yes, provide details of the same.

Yes. ICICI Lombard's Code of Conduct emphasises the importance of avoiding situations that might lead to potential or perceived conflicts of interest. At ICICI Lombard, employees are expected to adhere to the Company's "Framework for Managing Conflict of Interest" and refrain from any actions that could result in a real or perceived conflict of interest. The Company is committed to conducting the business with the highest standards of compliance and ethical conduct to be followed by all staff members and Board members in order to prevent and manage conflicts of interest. The Company also receives a declaration on an annual basis as well as changes, from time to time, from the members of the Board regarding the entities they are interested in. Moreover, the Directors are required to recuse themselves from the discussions pertaining to the conflict of interest. The Directors exercises their responsibilities in a bonafide manner and in the best interest of the Company. The Company has established Policy on Related Party Transactions defining the conduct of business based on ordinary course of business or Arms' length principles which means a transaction between two related parties that is conducted as if they were unrelated, so that there is no conflict of interest. The Audit committee reviews and deliberates the approval of any related party transactions. For more details, refer to the policy. Additionally, the Policy on **Board Diversity** outlines the requirement to have a significant number of "Independent Directors" which is important in respect of insurance companies under conglomerate structure and where there is potential scope for transfer of risks and conflicts of interests that affect the group entities.

## PRINCIPLE 2

Businesses should provide goods and services in a manner that is sustainable and safe



## ESSENTIAL INDICATORS

1. **Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

|       | FY 2024        | FY 2023        | Details of improvements in environmental and social impacts   |
|-------|----------------|----------------|---|
| R&D   | Not Applicable | Not Applicable | ICICI Lombard continually invests in upgradation of digital systems to enhance customer experience and achieve higher operational efficiency. |
| Capex | Not Applicable | Not Applicable |   |

2. **a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)**

Yes, the Company has established **Supplier Code of Conduct** which acts as a guideline for conducting its business with highest standards of compliance and ethical conduct. The Supplier Code of Conduct implemented by the Company has integrated ESG related guidelines ranging from timely compliance, occupational health and safety, Equal Opportunity, fair employment expecting the suppliers to observe highest standards of integrity, honesty, fairness, discipline, decorum and ethical conduct while working for the Company as well as while representing the Company. Being in the insurance industry, the material purchase at ICICI Lombard is only limited to operational use. During the procurement of these materials, the Company prioritises the sourcing the sustainable materials considering the features of energy efficiency, supplier practices and transparency etc.

- b. If yes, what percentage of inputs were sourced sustainably?**

The Company has not aggregated the information on inputs sourced sustainably for FY2024.

3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for**

**(a) Plastics (including packaging)**

**(b) E-waste**

**(c) Hazardous waste and**

**(d) other waste.**

Not Applicable, owing to the nature of the Company's business and sector that the Company operates in.

4. **Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.**

Not Applicable.

## LEADERSHIP INDICATORS

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

| NIC Code | Name of Product / Service | % of total Turnover contributed | Boundary for which the Life Cycle Perspective / Assessment was conducted | Whether conducted by independent external agency (Yes/No) | Results communicated in public domain (Yes/No) If yes, provide the web-link. |
|----------|---------------------------|---------------------------------|--|---|--|
|----------|---------------------------|---------------------------------|--|---|--|

Not Applicable

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

| Name of Product/Service | Description of the risk/concern | Action Taken |
|-------------------------|---------------------------------|--------------|
|-------------------------|---------------------------------|--------------|

Not Applicable

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

| Indicate input material | Recycled or re-used input material to total material |         |
|-------------------------|--|---------|
|                         | FY 2024  | FY 2023 |

Not Applicable

4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:

|                                | FY 2024        |          |                 | FY 2023 |          |                 |
|--------------------------------|----------------|----------|-----------------|---------|----------|-----------------|
|                                | Re-Used        | Recycled | Safely Disposed | Re-Used | Recycled | Safely Disposed |
| Plastics (including packaging) | Not Applicable |          |                 |         |          |                 |
| E-waste                        |                |          |                 |         |          |                 |
| Hazardous waste                |                |          |                 |         |          |                 |
| Other waste                    |                |          |                 |         |          |                 |

5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.

| Indicate product category | Reclaimed products and their packaging materials as % of total products sold in respective category |
|---------------------------|---|
|---------------------------|---|

Not Applicable



**PRINCIPLE 3**

Businesses should respect and promote the well-being of all employees, including those in their value chains

**ESSENTIAL INDICATORS****1. a. Details of measures for the well-being of employees:**

| Category                       | % of employees covered by  |                  |         |                    |         |                    |                |                    |                |   |         |
|--------------------------------|--|------------------|---------|--------------------|---------|--------------------|----------------|--------------------|----------------|---|---------|
|                                | Total (A)  | Health insurance |         | Accident insurance |         | Maternity benefits |                | Paternity Benefits |                | Day Care facilities   |         |
|                                |  | Number (B)       | % (B/A) | Number (C)         | % (C/A) | Number (D)         | % (D/A)        | Number (E)         | % (E/A)        | Number (F)  | % (F/A) |
| Permanent employees            |  |                  |         |                    |         |                    |                |                    |                |   |         |
| Male                           | 10,386   | 10,386           | 100.0%  | 10,386             | 100.0%  | Not Applicable     | Not Applicable | 6,507              | 62.7%          | Applicable for eligible male and female employees. ICICI Lombard has tie-ups with day care facilities across the locations. |         |
| Female                         | 3,284  | 3,284            | 100.0%  | 3,284              | 100.0%  | 1,273              | 38.8%          | Not Applicable     | Not Applicable |   |         |
| Total                          | 13,670   | 13,670           | 100.0%  | 13,670             | 100.0%  | 1,273              | 9.3%           | 6,507              | 47.6%          |   |         |
| Other than Permanent employees |  |                  |         |                    |         |                    |                |                    |                |   |         |
| Male                           | Vendors are required to comply to statutory requirements in ensuring the provision of employee benefits as outlined by the regulations |                  |         |                    |         |                    |                |                    |                |   |         |
| Female                         |  |                  |         |                    |         |                    |                |                    |                |   |         |
| Total                          |  |                  |         |                    |         |                    |                |                    |                |   |         |

**b. Details of measures for the well-being of workers:**

Not Applicable

**c. Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format-**

|   | FY 2024 | FY 2023 |
|---|---------|---------|
| Cost incurred on well-being measures as a % of total revenue of the Company | 0.2%    | 0.2%    |

Notes:

- The disclosures are made for permanent employees at fixed contracted Cost-to-Company excluding variables, bonuses, PF and other retiral benefits.
- Benefits paid for sick leaves are not considered for reporting.

**2. Details of retirement benefits, for Current Financial Year and Previous Financial Year**

| Benefits                    | FY 2024  |  |  | FY 2023  |  |  |
|-----------------------------|--|--|--|--|--|--|
|                             | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) |
| PF                          | 100.0%   | Not Applicable                                 | Y  | 100.0%   | Not Applicable                                 | Y  |
| Gratuity                    | 100.0%   | Not Applicable                                 | Y  | 100.0%   | Not Applicable                                 | Y  |
| ESI                         | 7.3%   | Not Applicable                                 | Y  | 8.0%   | Not Applicable                                 | Y  |
| Others – (Professional Tax) | 65.6%  | Not Applicable                                 | Y  | 76.0%  | Not Applicable                                 | Y  |

**3. Accessibility of workplaces**

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

Workspaces where differently abled employees are employed (Vashi, Rourkela and Brilliant Titanium – Indore) are equipped with accessibility features as per the guidelines outlined in the Rights of Persons with Disability Act, 2016.

**4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a web-link to the policy.**

The Company is committed to equal opportunities in employment and welcomes individuals with disabilities. It ensure that all employees are treated with fairness and equality. The offices with differently abled employees are equipped with accessibility features. The Company actively integrates accessibility features across all its offices to comply with the Rights of Persons with Disabilities Act, 2016.

Further information on this policy has been provided in Code of Conduct - Workplace Responsibilities/Fair Employment Practices and Diversity - which can be accessed at: ICICI Lombard's **CODE OF CONDUCT**

**5. Return to work and Retention rates of permanent employees and workers that took parental leave.**

| Gender                      | Permanent employees |                | Permanent workers   |                |
|-----------------------------|---------------------|----------------|---------------------|----------------|
|                             | Return to work rate | Retention rate | Return to work rate | Retention rate |
| Male                        | 100.0%              | 84.5%          | Not Applicable      |                |
| Female                      | 100.0%              | 88.9%          |                     |                |
| Total - Return to work rate | 100.0%              | 85.6%          |                     |                |

**6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.**

|                                | Yes/No (If Yes, then give details of the mechanism in brief)   |
|--------------------------------|--|
| Permanent Workers              | Not Applicable   |
| Other than Permanent Workers   | Not Applicable   |
| Permanent Employees            | <b>Grievance Redressal Mechanisms at ICICI Lombard:</b>  |
| Other than Permanent Employees | <p>The organisation has a Whistle Blower policy in place which provides all employees an opportunity to raise any issues/grievances anonymously, where the identity of the whistle-blower is kept confidential. A dedicated email ID has been created at an organisational level, to which the employees can write their concerns. A dedicated single point contact (SPOC) is assigned to look into all matters independently and fairly.</p> <p>ICICI Lombard has established a well-placed process for addressing employee grievances. An employee with a grievance can reach out to his/her immediate or skip manager as the first point of contact. In case of no resolution, the respective business HR is the next point of contact, responsible for investigation and resolution in a fair &amp; transparent manner. In case no satisfactory results are achieved, the employee can reach out to the regional HR, followed by the all-India HR. In case of continuing discontent, the Company appoints a Grievance Redressal Committee, consisting of three neutral members to understand the concern, investigate the matter, and provide an appropriate resolution. As a next level, the employee can reach out to the Appellate authority for appealing against the investigation outcome.</p> <p>For POSH-related matters, the employees are expected to raise it with the local HR team or to the dedicated email ID of the Internal Committee. This can be escalated to the Chairperson of the Internal Committee. The final level of escalation is to the HR Head of the organisation.</p> <p>ICICI Lombard has also established other platforms to address employees' concerns and complaints. The employees can file their complaints/grievances on Reach MeBOT*, or report directly to HR through their representatives. The Company ensures prompt and effective resolution of grievances to create a workplace of equitable hiring and eliminated discrimination against employees. In addition, ICICI Lombard provides a Fair Appeal process - a unique platform for all employees to raise their grievances related to the fairness of the performance management process. This platform provides every employee to appeal for any unfair or unjust evaluation of year-end appraisals with relevant facts and evidence. All such grievances are reviewed and assessed to provide fair and transparent findings and resolutions to such employees.</p> <p>For further appeal on any decision from a grievance redressal body, appellate authorities are available who are empowered to deliberate and decide on such matters.</p> <p>The Company also has robust mechanisms in place to safeguard the complainant against any adverse consequences. In the first place, Company maintains the utmost confidentiality of the Complainant. All related parties against whom the Complaint has been reported are sensitised of any retaliatory action against the complainant. In case any incident of retaliation is observed or brought to the notice of the management, the Company takes appropriate action on the reported matter and ensures that the complainant does not have to go through adverse consequences.</p> |

\* available only to permanent employees

**7. Membership of employees and worker in association(s) or Unions recognised by the listed entity:**

| Category                  | FY 2024  |  |           | FY 2023  |  |           |
|---------------------------|--|--|-----------|--|--|-----------|
|                           | Total employees / workers in respective category (A)   | No. of employees / workers in respective category, who are part of association(s) or Union (B) | % (B / A) | Total employees / workers in respective category (C) | No. of employees / workers in respective category, who are part of association(s) or Union (D) | % (D / C) |
| Total Permanent Employees |  |  |           |  |  |           |
| Male                      | None. There are no employee associations or unions. ICICI Lombard however recognises the right to freedom of association of employees. |  |           |  |  |           |
| Female                    |  |  |           |  |  |           |
| Total Permanent Workers   |  |  |           |  |  |           |
| Male                      | Not Applicable   |  |           |  |  |           |
| Female                    |  |  |           |  |  |           |

**8. Details of training given to employees and workers:**

| Category  | FY 2024        |                               |         |                      |         | FY 2023   |                               |         |                      |         |
|-----------|----------------|-------------------------------|---------|----------------------|---------|-----------|-------------------------------|---------|----------------------|---------|
|           | Total (A)      | On Health and safety measures |         | On Skill upgradation |         | Total (D) | On Health and safety measures |         | On Skill upgradation |         |
|           |                | No. (B)                       | % (B/A) | No. (C)              | % (C/A) |           | No. (E)                       | % (E/D) | No. (F)              | % (F/D) |
| Employees |                |                               |         |                      |         |           |                               |         |                      |         |
| Male      | 10,107         | 7,734                         | 76.5%   | 8,847                | 87.5%   | 10,083    | 9,066                         | 89.9%   | 9,691                | 96.1%   |
| Female    | 3,144          | 2,246                         | 71.4%   | 2,678                | 85.2%   | 2,782     | 2,147                         | 77.1%   | 2,560                | 92.1%   |
| Total     | 13,251         | 9,980                         | 75.3%   | 11,525               | 87.0%   | 12,865    | 11,213                        | 87.1%   | 12,251               | 95.2%   |
| Workers   |                |                               |         |                      |         |           |                               |         |                      |         |
| Male      | Not Applicable |                               |         |                      |         |           |                               |         |                      |         |
| Female    |                |                               |         |                      |         |           |                               |         |                      |         |
| Total     |                |                               |         |                      |         |           |                               |         |                      |         |

Notes: The Company does not employ or engage with 'worker', as defined in the guidance note on BRSR, issued by SEBI.

**9. Details of performance and career development reviews of employees and worker:**

| Category         | FY 2024        |               |               | FY 2023       |               |              |
|------------------|----------------|---------------|---------------|---------------|---------------|--------------|
|                  | Total (A)      | No. (B)       | % (B / A)     | Total (C)     | No. (D)       | % (D / C)    |
| <b>Employees</b> |                |               |               |               |               |              |
| Male             | 10,269         | 10,269        | 100.0%        | 10,083        | 9,821         | 97.4%        |
| Female           | 3,205          | 3,205         | 100.0%        | 2,782         | 2,630         | 94.5%        |
| <b>Total</b>     | <b>13,474</b>  | <b>13,474</b> | <b>100.0%</b> | <b>12,865</b> | <b>12,451</b> | <b>96.7%</b> |
| <b>Workers</b>   |                |               |               |               |               |              |
| Male             | Not Applicable |               |               |               |               |              |
| Female           |                |               |               |               |               |              |
| <b>Total</b>     |                |               |               |               |               |              |

Note: The Company does not employ or engage with 'worker', as defined in the guidance note on BRSR, issued by SEBI

## 10. Health and safety management system:

### a. **Whether an occupational health and safety management system has been implemented by the entity? (Yes/No). If yes, the coverage of such system?**

Yes. ICICI Lombard's occupational health and safety management system is a comprehensive framework designed to ensure the well-being of employees in the workplace. The Company encourages responsible behaviour of its employees and colleagues that result in the best possible accident prevention measures. This applies both to the technical planning of workplaces, equipment and processes, and to safety management and personal behaviour in everyday work place. For more details, refer to Employee health and safety guidelines.

#### **Important elements of safety management system:**

- Branches and offices are equipped with fire alarm actuated with smoke detectors placed at several locations.
- Branches and offices are equipped with fire alarm actuated with smoke detectors placed at several locations. To facilitate temperature control, these rooms shall also be well ventilated and air conditioned.
- Regular fire drills, safety drills, and periodic third-party audits of safety systems with strict adherence to safety regulations. Fire marshals are identified across the branches and are required to demonstrate safety behaviour during the mock drills.
- All the branches and offices have a list of emergency contact numbers placed at reception which is the common area, so that employees may contact emergency authorities (Police Station, Hospital, Ambulance, Fire) easily.
- All the electrical fittings, power sockets and network wires shall be inspected frequently and repairs should be carried out as necessary without any delay to avoid mishap.
- All the workstations shall be equipped with ergonomic chairs and tables to minimise workplace sickness and injuries which might occur due to prolonged sitting and working on laptops.
- Personal accident insurance, health insurance plans, annual health check-ups
- Employee assistance helpline and accessibility to doctors, other emergency and ambulance services
- Safety Training at IL branches
- IL TakeCare App providing improved access to healthcare
- Santulan, an exclusive program for mental and emotional well-being

### b. **What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?**

ICICI Lombard encourages employees to report any work-related hazards or grievances to their HR Managers to implement or enhance safety protocols. Employees receive regular internal communications and notifications to adopt precautionary measures in case of safety risks. Safety-related awareness sessions are also conducted, and employees across all offices receive recurring training in basic and advanced fire safety, including drills for escape in case of a fire.

### c. **Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)**

Not Applicable owing to the nature of the Company's operations. The Company acknowledges the importance of risk management in maintaining workplace safety. The Company identifies potential risks associated with utilities, fire hazards, construction, and other factors. To ensure safety across all offices and branches, the Company has installed fire safety equipment that undergoes regular checks and maintenance. Furthermore, the Company conducts periodic fire evacuation drills to familiarise branch staff with emergency procedures for a safe exit. Each branch designates fire marshals who receive specialised training to lead in such situations. They are responsible for reporting incidents or identifying potential risks to the Branch Services and Central Admin teams for timely mitigation measures.

**d. Do the employees/worker of the entity have access to non-occupational medical and healthcare services? (Yes/No)**

Yes. ICICI Lombard provides a range of non-occupational medical and healthcare services, aiming to ensure the well-being of individuals and their families. This also covers assistance with medical costs:

- Employee assistance helpline;
- Mediclaim insurance (family floater cover and corporate buffer);
- IL TakeCare app offers employees a one-stop shop for mental wellness counselling, doctor consultations, and health risk assessments.
- Health and accident insurance
- Sabbatical leave, to avail breaks for education or any personal priorities
- Leave donation to colleagues in need of additional leaves for medical & other emergencies. This is in addition to earned (privilege) leave and casual-cum-sick leave which is available to all employees

**11. Details of safety related incidents, in the following format:**

| Safety Incident/Number   | Category  | FY 2024        | FY 2023 |
|--|-----------|----------------|---------|
| Lost Time Injury Frequency Rate (LTIFR)<br>(per one million-person hours worked) | Employees | 0.0%           | 0.0%    |
|  | Workers   | Not Applicable |         |
| Total recordable work-related injuries   | Employees | 0              | 0       |
|  | Workers   | Not Applicable |         |
| No. of fatalities  | Employees | 0              | 0       |
|  | Workers   | Not Applicable |         |
| High consequence work-related injury or ill-health<br>(excluding fatalities)     | Employees | 0              | 0       |
|  | Workers   | Not Applicable |         |

Notes:

- LTIFR includes only work-related injuries, disabilities, and deaths and excludes ill-health.
- The disclosures are made for permanent employees.

**12. Describe the measures taken by the entity to ensure a safe and healthy work place.**

The Company's commitment to a safe and healthy workplace encompasses various measures to ensure the well-being of the employees. While outlining all applicable laws and regulations, the Company regularly updates systems, policies, and process to adapt to the evolving work environment. Branches and offices are equipped with fire alarms, smoke detectors, and temperature control devices which are placed strategically. Regular fire and safety drills, are conducted to ensure compliance with safety regulations. Fire marshals in branches undergo mock drills to demonstrate safety protocols. Workstations are furnished with ergonomic chairs and tables to minimise workplace-related sickness and injuries caused by prolonged laptop use. In doing so, the Company is also committed to ensure its employees and customers to remain free from any kind of risk to their health and safety at workplace. For more details, refer to [Employee health and safety guidelines](#).

The following employee benefits are also provided to employees for ensuring the well-being:

**Insurance & Helpline benefits:**

- Mediclaim insurance (family floater cover and corporate buffer);
- Health and accident insurance
- Employee assistance helpline;
- Employee assistance counselling services
- IL TakeCare app offers employees a one-stop shop for mental wellness counselling, doctor consultations, and health risk assessments.
- 'Santulan' Employee Assistance Program (ICICI Lombard offers a 24/7 counselling hotline with free access to expert psychologists, providing support for effective coping mechanisms and self-care routines to manage stress. Total employees availed of Santulan services in FY2024: 262)

**Employee and leave benefits:**

- Retirement benefits like PF, Gratuity, ESI
- Parental leaves – Maternity, Paternity & Adoption
- Sabbatical leave, to avail breaks for education or any personal priorities
- This is in addition to earned (privilege) leave and casual-cum-sick leave which is available to all employees
- Leave donation to colleagues in need of additional leaves for medical & other emergencies

**Work-life balance employee benefits:**

- Preferred working hours (in select locations)
- Family Fridays, and Leave Donations to aid work-life integration

**13. Number of Complaints on the following made by employees and workers:**

|                    | FY 2024               |                                       |         | FY 2023               |                                       |         |
|--------------------|-----------------------|---------------------------------------|---------|-----------------------|---------------------------------------|---------|
|                    | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working Conditions | None                  | None                                  | None    | None                  | None                                  | None    |
| Health & Safety    | None                  | None                                  | None    | None                  | None                                  | None    |

**14. Assessment for the year:**

|                             | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|-----------------------------|---|
| Health and safety practices | None  |
| Working Conditions          | None  |

**15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks/ concerns arising from assessments of health & safety practices and working conditions.**

Not applicable

## LEADERSHIP INDICATORS

### 1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers(Y/N).

**Employees:** Yes. ICICI Lombard offers group life insurance, group personal accident insurance and to all its employees along with provident fund and gratuity. Gratuity is paid to applicable employees having completed the required tenure as per Payment of Gratuity Act, 1972. In the unfortunate event of an employee's demise, the Company extends the proceeds and benefits from each of these schemes to the employee's family or nominee

**Workers:** Not Applicable

### 2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

ICICI Lombard strives for increased incorporation of environmental and social considerations in the business operation by establishing explicit expectations with value chain partners. The Company through its extended due-diligence undertakes appropriate steps to ensure that the value chain partners have properly withheld and deposited statutory dues.

### 3. Provide the number of employees / workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

|           | Total no. of affected employees/ workers |         | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment |         |
|-----------|--|---------|---|---------|
|           | FY 2024                                  | FY 2023 | FY 2024   | FY 2023 |
| Employees | None                                     | None    | None  | None    |
| Workers   | Not Applicable                           |         |   |         |

Notes: The Company does not employ or engage with any 'worker', as defined in the guidance note on BRSR, issued by SEBI.

### 4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

No, ICICI Lombard does not currently offer such transition support services to the workforce. ICICI Lombard consistently enhances employee skills with ongoing training, capability building, and support for certification programs by CII (Confederation of Indian Industry) and IIL (Insurance Institute of India). Regular awareness sessions on industry best practices further contribute to improving overall employee competencies, ensuring their employability in the sector.

Furthermore, the Company provides sabbatical opportunities for eligible employees, ensuring a guaranteed return to the workforce upon completion of the sabbatical period

### 5. Details on assessment of value chain partners:

|                             | % of value chain partners (by value of business done with such partners) that were assessed  |
|-----------------------------|--|
| Health and safety practices | The Company mandates that all value chain partners adhere to relevant laws and regulations, which encompass working conditions and health and safety procedures. These stipulations are explicitly outlined in the procurement contracts. Hence, the Company has not conducted comprehensive assessments concerning the working conditions and health and safety procedures employed by value chain partners. For more details, refer to <b>Supplier's Code of Conduct</b> |
| Working Conditions          |  |

### 6. Provide details of any corrective actions taken or underway to address significant risks/concerns arising from assessments of health and safety practices and working conditions of value chain partners.

Not Applicable; No corrective action plan has been necessitated on the above-mentioned parameters.

## PRINCIPLE 4

Businesses should respect the interests of and be responsive to all its stakeholders



## ESSENTIAL INDICATORS

### 1. Describe the processes for identifying key stakeholder groups of the entity.

The Company takes a structured approach to identifying the stakeholder groups that matter most to its business. The Company has a comprehensive stakeholder engagement to assesses the impact and influence of various groups on its business operations, and in turn, the Company's impact on them. The Company leverages established channels for active engagement with these stakeholders.

Through this systematic process, the Company has identified key stakeholder groups like customers, communities, channel partners, shareholders, and employees.

### 2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

| Stakeholder Group        | Whether identified as Vulnerable & Marginalised Group (Yes/No)               | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other  | Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)   | Purpose and scope of engagement including key topics and concerns raised during such engagement   |
|--------------------------|--|--|--|---|
| Customer                 | Yes, if they qualify based on specified criteria such as income, gender etc. | <ul style="list-style-type: none"> <li>Engagement at all stages of the product lifecycle</li> <li>Multi-channel engagement mechanism – phone, digital channel, trained customer relationship managers</li> <li>Sales, service, and claims processes on digital platform</li> <li>Claims process explained through website, policy documents and educational videos</li> <li>Regular measurement of customer satisfaction exchange</li> </ul> | Frequent and need-based  | <ul style="list-style-type: none"> <li>Product pricing</li> <li>ESG Products and Services</li> <li>Health and Well-Being</li> <li>Innovation and Digitisation</li> <li>Data Privacy and Security</li> <li>Customer Relationship Management</li> <li>Transparency</li> </ul>     |
| Shareholders & Investors | No   | <ul style="list-style-type: none"> <li>Quarterly financial statements</li> <li>Investor presentations</li> <li>Annual report</li> <li>Annual General Meeting</li> <li>Investor/Analyst meet (to discuss Financial performance and ESG initiatives)</li> <li>Press conferences and media releases</li> <li>ESG Disclosures</li> <li>Announcement through stock exchanges</li> </ul>   | <ul style="list-style-type: none"> <li>Quarterly</li> <li>Need-basis</li> <li>Annually</li> <li>Annually</li> <li>Frequent and Need-basis</li> <li>Need-basis</li> <li>Annually</li> <li>Need-basis</li> </ul> | <ul style="list-style-type: none"> <li>Responsible Investment</li> <li>Economic Performance</li> <li>Enterprise Risk Management</li> <li>Disaster Resilience and Adaptation to Climate Change</li> <li>Operational Eco-efficiency</li> <li>Climate Change Mitigation</li> </ul> |



| Stakeholder Group                         | Whether identified as Vulnerable & Marginalised Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other  | Frequency of engagement (Annually/ Half yearly/ Quarterly / others – please specify)   | Purpose and scope of engagement including key topics and concerns raised during such engagement  |
|---|--|--|--|--|
| Government and regulator                  | No   | <ul style="list-style-type: none"> <li>• Directives and circulars</li> <li>• Meetings / discussions</li> <li>• Press releases</li> <li>• Policy advocacy</li> <li>• Submission of reports and returns</li> <li>• Workshops by regulators</li> </ul>  | Frequent and need-based  | <ul style="list-style-type: none"> <li>• Human Rights</li> <li>• Public Policy Advocacy</li> <li>• Climate Change Mitigation</li> <li>• Board Composition and Processes</li> <li>• Compliance</li> </ul>   |
| KMP & Employees                           | No   | <ul style="list-style-type: none"> <li>• Townhall meetings</li> <li>• HR portals and intranet</li> <li>• Performance updates</li> <li>• Workshop, learning and training interventions</li> <li>• Wellness initiatives</li> <li>• Internal publications, circulars, posters, videos, e-mails</li> <li>• Employee Engagement &amp; Satisfaction Survey</li> <li>• Live interaction sessions</li> <li>• Flexible &amp; hybrid working arrangements</li> </ul> | <ul style="list-style-type: none"> <li>• Quarterly</li> <li>• On-Going</li> <li>• Annually</li> <li>• Regular</li> <li>• Regular</li> <li>• As &amp; when required</li> <li>• Annually</li> <li>• Regular</li> </ul> | <ul style="list-style-type: none"> <li>• Assessment of effectiveness of learning and development</li> <li>• Fair remuneration practices; equal employment opportunities</li> <li>• Effective performance management and recognition</li> <li>• Career growth</li> <li>• Diverse, inclusive and enabling work culture</li> <li>• Work-life balance</li> <li>• Fair Workplace</li> <li>• Occupational Health, Safety and Well-Being</li> <li>• Fair Pay</li> <li>• Talent Attraction and Retention</li> <li>• Diversity and Inclusion</li> </ul> |
| Channel partners and distributor/ Vendors | No   | <ul style="list-style-type: none"> <li>• Meets, workshops, conferences, and forums</li> <li>• One-to-one meetings</li> <li>• Telephonic and e-mail</li> <li>• Channel partner management portals</li> <li>• Periodic visits</li> </ul>   | Frequent and need-based  | <ul style="list-style-type: none"> <li>• Product Pricing</li> <li>• Data Privacy and Security</li> <li>• Innovation and Digitisation</li> </ul>  |
| Communities                               | Yes  | <ul style="list-style-type: none"> <li>• Community projects</li> <li>• Employee volunteerism</li> <li>• Awareness workshops</li> <li>• Interaction through the branch network</li> </ul>   | Frequent and need-based  | <ul style="list-style-type: none"> <li>• Community Development</li> <li>• Financial Inclusion</li> </ul>   |

## LEADERSHIP INDICATORS

**1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.**

The Company actively interacts with diverse stakeholder groups throughout the year via various channels to ensure effective two-way communication. Employee-level committees report stakeholder feedback to the management-level ESG Steering Committee. The CSR & Sustainability Committee oversees the implementation of consultation channels to facilitate robust engagement with stakeholders on key economic, environmental, and social topics.

**2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.**

Yes, ICICI Lombard, in line with the principles and brand motto of "Fulfilling Promises," has established channels for active engagement with all stakeholder groups. The Company has conducted comprehensive stakeholder engagement to understand the key priority ESG material topics for its business and stakeholders. The Company has aligned its ESG framework to manage the identified priority topics. The Company has also proactively established various policies and internal systems to manage and disclose the strategy on priority topics. The Company has established strong communication channels for the engagement with stakeholder groups. This also includes grievance redressal mechanism to receive inputs and concerns of the stakeholder groups reinforcing its commitment as a responsible business brand.

**3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/marginalised stakeholder groups.**

The Company actively promotes a strong grievance redressal system for all employees. The Company's DEI programmes detailed in "Creating a Future-Ready Workforce" section in ESG report Page 56 outlines its initiatives including active engagements. The Company also collaborates with communities and its initiatives are proposed to ensure the well-being of communities. For more details, refer to Page 77. In addition, financial products and services of the Company designed to meet the needs of underprivileged populations, has been worked out with more focus on accessibility.

## PRINCIPLE 5

Businesses should respect and promote human rights



## ESSENTIAL INDICATORS

## 1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

| Category               | FY 2024        |  |               | FY 2023       |  |               |
|------------------------|----------------|--|---------------|---------------|--|---------------|
|                        | Total (A)      | No. of employees / workers covered (B) | % (B / A)     | Total (C)     | No. of employees / workers covered (D) | % (D / C)     |
| <b>Employees</b>       |                |  |               |               |  |               |
| Permanent              | 13,670         | 13,670                                 | 100.0%        | 12,865        | 12,865                                 | 100.0%        |
| Other than permanent   | None           | None                                   | None          | None          | None                                   | None          |
| <b>Total Employees</b> | <b>13,670</b>  | <b>13,670</b>                          | <b>100.0%</b> | <b>12,865</b> | <b>12,865</b>                          | <b>100.0%</b> |
| <b>Workers</b>         |                |  |               |               |  |               |
| Permanent              | Not Applicable |  |               |               |  |               |
| Other than permanent   |                |  |               |               |  |               |
| <b>Total Workers</b>   |                |  |               |               |  |               |

Note: The Company does not employ or engage with 'worker', as defined in the guidance note on BRSR, issued by SEBI.

## 2. Details of minimum wages paid to employees and workers, in the following format:

| Category             | FY 2024        |                       |         |                        |         | FY 2023  |                       |         |                        |         |
|----------------------|----------------|-----------------------|---------|------------------------|---------|--|-----------------------|---------|------------------------|---------|
|                      | Total (A)      | Equal to Minimum Wage |         | More than Minimum Wage |         | Total (D)  | Equal to Minimum Wage |         | More than Minimum Wage |         |
|                      |                | No. (B)               | % (B/A) | No. (C)                | % (C/A) |  | No. (E)               | % (E/D) | No. (F)                | % (F/D) |
| Employees            |                |                       |         |                        |         |  |                       |         |                        |         |
| Permanent            | 13,670         | 0                     | 0.00%   | 13,670                 | 100.0%  | 14,417   | 1552                  | 10.8%   | 12,865                 | 89.2%   |
| Male                 | 10,386         | 0                     | 0.00%   | 10,386                 | 100.0%  | 11,026   | 943                   | 8.6%    | 10,083                 | 91.4%   |
| Female               | 3,284          | 0                     | 0.00%   | 3,284                  | 100.0%  | 3,391  | 609                   | 18.0%   | 2,782                  | 82.0%   |
| Other than Permanent | 1,326          | 630                   | 47.5%   | 696                    | 52.5%   | Note : FY2023 data is consolidated of Permanent and Non-Permanent employees. |                       |         |                        |         |
| Male                 | 794            | 346                   | 43.6%   | 448                    | 56.4%   |  |                       |         |                        |         |
| Female               | 532            | 284                   | 53.4%   | 248                    | 46.6%   |  |                       |         |                        |         |
| Workers              |                |                       |         |                        |         |  |                       |         |                        |         |
| Permanent            | Not applicable |                       |         |                        |         |  |                       |         |                        |         |
| Male                 |                |                       |         |                        |         |  |                       |         |                        |         |
| Female               |                |                       |         |                        |         |  |                       |         |                        |         |
| Other than Permanent |                |                       |         |                        |         |  |                       |         |                        |         |
| Male                 |                |                       |         |                        |         |  |                       |         |                        |         |
| Female               |                |                       |         |                        |         |  |                       |         |                        |         |

Note: The Company does not employ or engage with 'worker', as defined in the guidance note on BRSR, issued by SEBI.

### 3. Details of remuneration/ salary/ wages:

#### a. Median remuneration/wages:

|   | Male   |   | Female |   |
|---|--------|---|--------|---|
|   | Number | Median remuneration/ salary/ wages of respective category | Number | Median remuneration/ salary/ wages of respective category |
| <b>Board of Directors (BoD)</b>                       |        |   |        |   |
| Executive Directors <sup>1</sup>                      | 2      | ₹ 33.4 million  | None   | Not Applicable  |
| Non-executive, Independent Directors <sup>2</sup>     | 6      | ₹ 2.95 million  | 1      | ₹ 3.60 million  |
| Non-executive, Non-Independent Directors <sup>3</sup> | 2      | None  | None   | Not Applicable  |
| <b>Key Managerial Personnel<sup>4</sup></b>           | 2      | ₹ 17.8 million  | None   | Not Applicable  |
| Employees other than BoD and KMP                      | 10,382 | ₹ 0.6 million   | 3,284  | ₹ 0.5 million   |
| Workers <sup>5</sup>                                  |        | Not Applicable  |        |   |

Notes:

- Details pertaining to Whole-time Directors of the Company
- The median remuneration of Non-executive, Independent Directors is calculated after considering sitting fees paid for attending the Board and Committee Meetings and remuneration in form of profit related commission paid, during FY2024.
- Non-executive, Non-independent Directors do not draw any remuneration from the Company.
- Key Managerial Personnel, as specified in Section 203 of the Companies Act 2013, includes Managing Director & Chief Executive Officer, Wholetime Directors, Chief Financial Officer and Company Secretary. Since, the median remuneration of the Executive Directors are already covered as a part of Board of Directors details stated above, the referred median remuneration are provided only for Chief Financial Officer and Company Secretary.
- The Company does not employ or engage with 'worker', as defined in the guidance note on BRSR, issued by SEBI.

#### b. Gross wages paid to females as % of total wages paid by the entity, in the following format:

|   | FY 2024 | FY 2023 |
|---|---------|---------|
| Gross wages paid to females as % of total wages | 19.2%   | 16.2%   |

Notes:

Gross wages paid considers fixed contracted Cost-to-Company (with proportionate adjustment for new joiner and resigned employees during financial year) excluding variable pay, bonuses, stock options and other perquisites.

### 4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes.

### 5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

The Company has in place mechanisms enabled for all the stakeholders to raise their concerns or report actual or potential human right related violation of the human rights issues. Further, the organisation has multiple policies and platforms to address the employee grievances related to human rights which are briefed below

#### a. Reach Me BOT:

It is a 24x7 AI platform for employees to raise concerns and solve queries, including those related to human rights, and seek resolution. The platform also helps connect employees with the relevant Single Points of Contact (SPOCs) or higher authorities (Reachme Bot is only available to Permanent employees.).

#### b. Dedicated HR SPOCS (Geography/Business group wise):

Employees (both permanent & non-permanent) can report human rights grievances or other concerns to dedicated HR SPOCs. An escalation matrix is defined to allow employees to contact higher-level authorities in case the issue remains unresolved.

#### c. Whistle Blower Policy

The organisation has established a Whistleblower (WB) policy, granting all employees the option and opportunity to raise issues or grievances anonymously while ensuring the confidentiality of the whistleblower's identity. A dedicated email ID has been established at the organisational level, allowing employees to voice their concerns. A designated SPOC has been assigned to impartially and fairly investigate all matters.

**d. Prevention of Sexual Harassment Guidelines (POSH)** Employees can contact the Internal Committee by emailing the dedicated ID or reach out to the HR team to report matters. An Internal committee which is established for each reported instance in compliance with the POSH (Prevention of Sexual Harassment) Act, conducts investigations and takes necessary actions as required.

**e. Appellate Authority**

If an employee with a grievance is dissatisfied with the outcome of any investigation or resolution, they have the option to appeal to the Appellate Authority of the Organisation.

**6. Number of Complaints on the following made by employees and workers:**

|                                   | FY 2024               |                                       |  | FY 2023               |                                       |  |
|-----------------------------------|-----------------------|---------------------------------------|--|-----------------------|---------------------------------------|--|
|                                   | Filed during the year | Pending resolution at the end of year | Remarks  | Filed during the year | Pending resolution at the end of year | Remarks  |
| Sexual Harassment                 | 12                    | 2                                     | The Company, through the policy ensures that all such complaints are resolved within defined timelines | 6                     | 2                                     | The Company, through the policy ensures that all such complaints are resolved within defined timelines |
| Discrimination at workplace       | None                  | None                                  | None   | None                  | None                                  | None   |
| Child Labour                      | None                  | None                                  | None   | None                  | None                                  | None   |
| Forced Labour/Involuntary Labour  | None                  | None                                  | None   | None                  | None                                  | None   |
| Wages                             | None                  | None                                  | None   | 1                     | None                                  | None   |
| Other human rights related issues | None                  | None                                  | None   | None                  | None                                  | None   |

**7. Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:**

|   | FY 2024 | FY 2023 |
|---|---------|---------|
| Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 12      | 6       |
| Complaints on POSH as a % of female employees / workers   | 0.3     | 0.2     |
| Complaints on POSH upheld   | 11      | 6       |

Notes:

- Number of POSH complaints received is reported in relation to the number of female employees at the end of the year.
- Complaints on POSH upheld excludes complaints which were reported during FY2024 and were pending for disposal at year end and includes 2 complaints which were pending for disposal on the first day of the year and are upheld during the year.

**8. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.**

The Company has established Code of Conduct for employees and is committed to prohibition of harassment and intimidation of Employees in the workplace. The Company through HR and various committees aims to conduct investigation and take necessary action for POSH related incidents and other complaints of discrimination or harassment. ICICI Lombard ensures 100.0% confidentiality of the respondent to protect them from adverse consequences. All parties involved in the reported complaint are made aware of the prohibition against any retaliatory actions. If any instance of retaliation is observed or brought to the management's attention, the Company takes appropriate action to address the matter and ensures that complainant does not face adverse consequences. Protection under the Policy shall be available to the employee who raises the concern under this Policy till such time that the complainant's employment exists with the Company. In addition, POSH complaints in the Company also allows complainant to proceed on paid leave (on request by the complainant and considering mitigating circumstances) or allows temporary posting to another branch/office till closure of investigation of either complainant or respondent (again on request by the complainant and depending on specifics of the case). Protection to employees and prevention against retaliation, victimisation or harassment for them raising any concern are covered in Whistle Blower Policy. In whistle blowing cases, the identity of the whistle blower is not revealed.

## 9. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

Yes, the Company incorporates various human rights principles into the business agreements and contracts wherever applicable.

## 10. Assessment for the year:

|                             | % of your plants and offices that were assessed (by entity or statutory authorities or third parties)   |
|-----------------------------|---|
| Child labour                | The business strictly prohibits the employment of child labor, forced labor, involuntary labor, or any form of discriminatory hiring practices. ICICI Lombard adheres to all relevant legal requirements. The Company also strives to promote these values across its value chain through Supplier Code of Conduct. |
| Forced/involuntary labour   |   |
| Sexual harassment           |   |
| Discrimination at workplace |   |
| Wages                       |   |
| Others-please specify       |   |

## 11. Provide details of any corrective actions taken or underway to address significant risks/ concerns arising from the assessments at Question 10 above.

Not Applicable.

## LEADERSHIP INDICATORS

### 1. Details of a business process being modified/introduced as a result of addressing human rights grievances/complaints.

ICICI Lombard consistently evaluates human rights opportunities and challenges. The Company implements robust mechanisms and policies to minimise incidents of unfair treatment, unprofessional behaviour, bias, workplace harassment, intimidation, threatening behaviour, and discrimination. The Company has established an effective mechanism to address grievances/complaints and ensure appropriate actions are taken. All company policies are authorised by the Board/Board Committees/senior management and are regularly subjected to internal audits and reviews. Processes and policies are revised periodically to ensure the alignment with The Company's core values. In FY2024, there were no reported incidents of discrimination, and no operations were identified as having a significant risk of child and forced labor.

### 2. Details of the scope and coverage of any Human rights due diligence conducted.

The Company's policies and processes undergo pre-approval from either the Board, the Board Committee, or the Senior Management. Internal audits and assessments of the Company's policies and procedures are carried out regularly. The organisation maintains compliance with pertinent regulations through periodic audits and a due diligence mechanism. These procedures cover all stakeholder groups includes employees, suppliers and others whose interests are aligned with ICICI Lombard's goals.

### 3. Is the premise/office of the entity accessible to differently-abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Workspaces where differently abled employees are employed (Vashi, Rourkela and Brilliant Titanium – Indore) are equipped with accessibility features as per the guidelines outlined in the Rights of Persons with Disability Act, 2016.

### 4. Details on assessment of value chain partners:

|                             | % of value chain partners (by value of business done with such partners) that were assessed  |
|-----------------------------|--|
| Child labour                | The Company has not aggregated this information for FY2024. However, ICICI Lombard expects all value chain partners to adhere to all applicable rules and regulations. The Company has established Suppliers Code of conduct which encourages its suppliers to adhere to highest standards of business conduct and thus prohibits child labour, forced bonded labour, sexual harassment, discrimination at work place. |
| Forced/involuntary labour   |  |
| Sexual harassment           |  |
| Discrimination at workplace |  |
| Wages                       |  |
| Others-please specify       |  |

### 5. Provide details of any corrective actions taken or underway to address significant risks/ concerns arising from the assessments at Question 4 above.

Not Applicable.

## PRINCIPLE 6

Businesses should respect and make efforts to protect and restore the environment



## ESSENTIAL INDICATORS

## 1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

| Parameter  | Unit  | FY 2024          | FY 2023          |
|--|---|------------------|------------------|
| <b>From renewable sources</b>  |   |                  |                  |
| Total electricity consumption (A)  | GJ  | 11,267.92        | 7,520.19         |
| Total fuel consumption (B)   | GJ  | None             | None             |
| Energy consumption through other sources (C)   | GJ  | None             | None             |
| <b>Total energy consumed from renewable sources (A+B+C)</b>  | <b>GJ</b>                                     | <b>11,267.92</b> | <b>7,520.19</b>  |
| <b>From non-renewable sources</b>  |   |                  |                  |
| Total electricity consumption (D)  | GJ  | 30,436.71        | 28,801.96        |
| Total fuel consumption (E)   | GJ  | 1,414.91         | 1,087.08         |
| Energy consumption through other sources (F)   | GJ  | None             | None             |
| <b>Total energy consumed from non-renewable sources (D+E+F)</b>  | <b>GJ</b>                                     | <b>31,851.62</b> | <b>29,889.04</b> |
| <b>Total energy consumed (A+B+C+D+E+F)</b>   | <b>GJ</b>                                     | <b>43,119.54</b> | <b>37,409.23</b> |
| <b>Energy intensity per rupee of turnover</b><br>(Total energy consumption/ turnover in rupees)  | GJ / Million ₹ of turnover                    | 0.17             | 0.17             |
| <b>Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total energy consumed/ Revenue from operations adjusted for PPP) | GJ / Million turnover in USD adjusted for PPP | 3.85             | 3.93             |
| <b>Energy intensity in terms of physical output</b>  |   | Not Applicable   | Not Applicable   |
| <b>Energy intensity (optional)</b> - the relevant metric may be selected by the entity   | GJ/ Headcount                                 | 2.88             | 2.59             |

Notes:

- The company has employed "Operational Control Approach" denoting that activities only which are under the operating control of the Company have been considered.
- Intensity ratios are computed based on the year-end employee count.

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Yes, PKF Sridhar & Santhanam LLP has conducted independent assurance.

**2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.**

Not Applicable

### 3. Provide details of the following disclosures related to water, in the following format:

| Parameter  | FY 2024            | FY 2023            |
|--|--------------------|--------------------|
| <b>Water withdrawal by source (in kilolitres)</b>  |                    |                    |
| (i) Surface Water  | 0                  | 0                  |
| (ii) Ground Water  | 0                  | 0                  |
| (iii) Third Party Water  | 0                  | 0                  |
| (iv) Seawater / desalinated water  | 0                  | 0                  |
| (v) Others - Government Water Supply   | 1,59,787.40        | 1,41,466.46        |
| <b>Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v)</b>  | <b>1,59,787.40</b> | <b>1,41,466.46</b> |
| <b>Total volume of water consumption (in kilolitres)</b>   | 0                  | 0                  |
| <b>Water intensity per rupee of turnover (Total Water consumption / Million turnover in USD adjusted for PPP)</b>  | 0                  | 0                  |
| <b>Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b><br>(Total water consumption/ Revenue from operations adjusted for PPP) | 0                  | 0                  |
| <b>Water intensity in terms of physical output</b>   | Not Applicable     | Not Applicable     |
| <b>Water intensity (optional) – the relevant metric may be selected by the entity</b>  | -                  | -                  |

Notes:

- Water withdrawn by the Company is reported based on Central Ground Water Authority's (CGWA) daily average water requirements for offices, excluding 1 Work-From-Home Day per week for eligible employees, and calculated basis normal working calendar and working hours of the company. The Company has not assessed / disclosed any other water withdrawn / discharged for FY2024.
- Intensity ratios are computed based on the year-end employee count.
- All withdrawn water as reported is considered to be sourced through Other Sources (Others - Government Water Supply) as well as considered as fully discharged to third parties as untreated owing to the nature of business.

Water related metrics are computed basis the manpower occupancy and per capita consumption as outlined by the regulatory agencies. ICICI Lombard operates in the service sector with water needs limited to drinking and sanitation purposes of the employees. Despite this, the Company is committed to the prudent utilisation of water resources in the major offices. Additionally, the Company actively replenishes water through rainwater harvesting at its Prabhadevi Office, resulting in the preservation of 10.31 million litres of water during the reporting period. The Company is also implementing measures to closely monitor water usage across the operations.

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Yes, PKF Sridhar & Santhanam LLP has conducted independent assurance.

### 4. Provide the following details related to water discharged:

| Parameter  | FY 2024            | FY 2023            |
|--|--------------------|--------------------|
| <b>Water discharge by destination and level of treatment (in kilolitres)</b> |                    |                    |
| i) To surface water  | 0                  | 0                  |
| - No treatment   | 0                  | 0                  |
| - With treatment-please specify level of treatment                           | 0                  | 0                  |
| ii) To Groundwater   | 0                  | 0                  |
| - No treatment   | 0                  | 0                  |
| - With treatment-please specify level of treatment                           | 0                  | 0                  |
| iii) To Seawater   | 0                  | 0                  |
| - No treatment   | 0                  | 0                  |
| - With treatment-please specify level of treatment                           | 0                  | 0                  |
| iv) Sent to third-parties  | 1,59,787.40        | 1,41,466.46        |
| - No treatment   | 1,59,797.40        | 1,41,466.46        |
| - With treatment-please specify level of treatment                           | 0                  | 0                  |
| v) Others  | 0                  | 0                  |
| - No treatment   | 0                  | 0                  |
| - With treatment-please specify level of treatment                           | 0                  | 0                  |
| <b>Total water discharged (in kilolitres)</b>                                | <b>1,59,787.40</b> | <b>1,41,466.46</b> |



**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency**

Yes, PKF Sridhar & Santhanam LLP has conducted independent assurance.

**5. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.**

No. ICICI Lombard operates in the service sector with water needs limited to drinking and sanitation purposes of the employees.

**6. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:**

| Parameter                           | Unit           | FY 2024        | FY 2023        |
|-------------------------------------|----------------|----------------|----------------|
| NOx                                 | Not Applicable | Not Applicable | Not Applicable |
| SOx                                 |                |                |                |
| Particulate matter (PM)             |                |                |                |
| Persistent organic pollutants (POP) |                |                |                |
| Volatile organic compounds (VOC)    |                |                |                |
| Hazardous air pollutants (HAP)      |                |                |                |
| Others-please specify               |                |                |                |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Not Applicable

**7. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:**

| Parameter  | Unit  | FY 2024        | FY 2023        |
|--|---|----------------|----------------|
| <b>Total Scope 1 emissions</b>   | Metric tonnes of CO <sub>2</sub> equivalent                             | 907.22         | 867.80         |
| <b>Total Scope 2 emissions</b>   | Metric tonnes of CO <sub>2</sub> equivalent                             | 6,958.17       | 6,480.44       |
| <b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover</b>  | Metric tonnes of CO <sub>2</sub> equivalent/ Million rupees of turnover | 0.03           | 0.03           |
| <b>Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> | GJ / Million turnover in USD adjusted for PPP                           | 0.703          | 0.773          |
| <b>Total Scope 1 and Scope 2 emission intensity in terms of physical output</b>                                      | Not Applicable  | Not Applicable | Not Applicable |
| <b>Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity</b>   | Metric tonnes of CO <sub>2</sub> equivalent per employee                | 0.52           | 0.51           |

Notes:

- The company has employed "Operational Control Approach" denoting that activities only which are under the operating control of the company have been considered.
- Intensity ratios are computed based on the year-end employee count.

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Yes, PKF Sridhar & Santhanam LLP has conducted independent assurance.

## 8. Does the entity have any project related to reducing Green House Gas emission? If Yes, then provide details.

The Company is advancing sustainable practices, promoting digital transactions and increased adoption of paperless transactions with an objective of reducing GhG emissions. Organisational-wide initiatives, including videoconferencing and energy-efficient measures, aim to reduce energy consumption. Energy audits have been conducted, and actions based on these audits are being evaluated. Additionally, the Company is procuring renewable energy for various branches. In FY2024, the Company's renewable energy procurement reached 27.0%, resulting in a reduction of 2,575.97 MTCO<sub>2</sub>e emissions. As a part of Company's CSR programs, the Company installed Solar Panels in under privileged schools. Further, the Company installs water purifier under its flagship program Nirnajali replacing the conventional methods of treating the water, thus avoiding GhG emissions.

## 9. Provide details related to waste management by the entity, in the following format:

| Parameter  | FY 2024        | FY 2023        |
|--|----------------|----------------|
| Total Waste generated (in metric tonnes)   |                |                |
| Plastic waste (A)  | Not Applicable | Not Applicable |
| E-waste (B)  | 21.40          | 27.03          |
| Construction and demolition waste (C)  | Not Applicable | Not Applicable |
| Battery waste (D)  | 17.52          | 19.23          |
| Radioactive waste (E)  | Not Applicable | Not Applicable |
| Biomedical Waste (F)   | Not Applicable | Not Applicable |
| Other Hazardous Waste (G)  | Not Applicable | Not Applicable |
| Other Non-hazardous waste generated (H). Please specify, if any.<br>(Paper waste and Sanitary waste)   | 50.84          | 52.27          |
| <b>Total (A+B + C + D + E + F + G + H)</b>   | <b>89.76</b>   | <b>98.53</b>   |
| <b>Waste intensity per rupee of turnover</b> (Total waste generated / Million rupees of turnover)  | 0.35           | 0.45           |
| <b>Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)</b> (Total waste generated / Billion turnover in USD adjusted for PPP) | 8.02           | 10.35          |
| <b>Waste intensity in terms of physical output</b>   | Not Applicable | Not Applicable |
| <b>Waste intensity (optional) – Waste Intensity in MT/Headcount</b>  | 0.01           | 0.01           |
| <b>For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)</b>             |                |                |
| <b>Category of waste</b>   |                |                |
| i) Recycled  | 68.90          | 49.55          |
| ii) Re-used  | -              | -              |
| iii) Other recovery operations   | -              | -              |
| <b>Total</b>   | <b>68.90</b>   | <b>49.55</b>   |
| <b>For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)</b>  |                |                |
| <b>Category of waste</b>   |                |                |
| i) Incineration  | 0.02           | 0.01           |
| ii) Landfilling  | 20.84          | 48.97          |
| iii) Other disposal operations   | -              | -              |
| <b>Total</b>   | <b>20.85</b>   | <b>48.98</b>   |

### Notes:

- Waste generated within the company's operational boundary is included in above data.
- Indicative weights derived from product specifications are used to estimate weight for known quantities.
- Construction and Demolition (C&D) Waste & Plastic Waste: Considered as Not applicable. The company does not have construction or remodelling activities as part of services provided and does not encourage single-use plastics in the premises.
- Intensity ratios are computed based on the year-end employee count.
- The Company has established protocols to ensure the safe disposal of waste to third party.
- Paper waste is calculated based on the quantity of printing paper purchased and recycled during service, excluding non-printing paper wastes.
- Sanitary waste data includes figures from branches where the Company has recycling agreements with third parties.
- All other waste not recycled or incinerated is considered to be sent to landfills.

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Yes, PKF Sridhar & Santhanam LLP has conducted independent assurance.

**10. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.**

The ESG Policy reflects the Company's commitment to managing and minimising the direct environmental impact. ICICI Lombard is a General Insurance Company and does not use/generate hazardous and toxic chemicals in course of its business. ICICI Lombard's waste is limited to paper, electronic and battery waste. Efforts have been made to reduce paper usage, and the Company is actively transitioning to paperless operations as a result the Company is operating at 1/3rd of the paper levels as compared to FY2019. Further, 41.86 MT of paper was recycled in FY2024.

E-waste generated by the Company is responsibly handed over to authorised recyclers for safe disposal and extended life. The Company has established effective waste management practices for the proper handling and disposal of operational waste. In FY2024, 9.22 MT of IT E-waste was handed over to authorised vendors. ICICI Lombard has embarked on a pioneering initiative in the sanitary waste management which involves disposing sanitary pads in a responsible manner.

**11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:**

Not Applicable. The Company does not have offices in or near ecologically sensitive areas. All offices are situated in buildings with the required permits and adheres to local municipal regulations.

**12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:**

Not applicable owing to the nature of business.

**13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:**

Yes. ICICI Lombard adheres to all relevant environmental laws, rules, and guidelines in India, such as the Environment Protection Act and Rules, the Air (Prevention and Control of Pollution) Act, and the Water (Prevention and Control of Pollution) Act. The Company did not experience any instances of non-compliance with the aforementioned laws and regulations.

## LEADERSHIP INDICATORS

### 1. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

For each facility/ plant located in areas of water stress, provide the following information:

i) Name of the area

ii) Nature of operations

iii) Water withdrawal, consumption and discharge

The Company did not conduct any water risk assessments

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Not Applicable

### 2. Please provide details of total Scope 3 emissions & its intensity, in the following format:

| Parameter   | Unit  | FY 2024  | FY 2023  |
|---|---|----------|----------|
| Total Scope 3 emissions   | Metric tonnes of CO <sub>2</sub> equivalent                             | 5,130.64 | 6,589.60 |
| Total Scope 3 emissions per rupee of turnover   | Metric tonnes of CO <sub>2</sub> equivalent/ million rupees of turnover | 0.02     | 0.03     |
| Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity |   | None     | None     |

Notes:

- Scope 3 categories include Fuel and Energy related activities (Electricity Transmission & Distribution losses), Waste Generated in operations, Business Travel (Road and Air Travel through Company empanelled vendors), Employee Commuting (Company Shuttles and WFH emissions).

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.**

Yes, the above disclosures are assured by PKF Sridhar & Santhanam LLP

### 3. With respect to the ecologically sensitive areas reported at Question 11 of Essential Indicators above, provide details of the significant direct & indirect impact of the entity on biodiversity in such areas along with prevention and remediation activities.

Not Applicable, as the Company does not have offices near or in ecologically sensitive areas.

### 4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

| Sr. No | Initiative undertaken                    | Details of the initiative (Web-link, if any, may be provided along-with summary)                        | Outcome of the initiative   |
|--------|--|---|---|
| 1.     | Use of energy efficient LEDs             | The Company has installed LED fixtures in access offices.   | 98.5% branches are functioning with LED lighting of which 284 branches have 100.0% LED lighting.              |
| 2.     | Procurement of Renewable Energy          | The Company has started procuring renewable energy in few branches to meet its operational requirements | Total Renewable Electricity Consumption = 3,129.98 MWh Total emissions avoided = 2,575.97 MTCO <sub>2</sub> e |
| 3.     | Responsible disposal of Sanitary Napkins | ICICI Lombard is disposing the sanitary wastes responsibly thereby diverting waste from landfill        | 0.33 MT of sanitary wastes is recycled  |

**5. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.**

ICICI Lombard has established a comprehensive Business Continuity Management (BCM) policy and a resilient BCM plan to safeguard against unforeseen events or uncertainties. Endorsed by the Board, the BCM policy provides broad directives for recovering and restoring information, resuming operations, and sustaining business continuity in the face of various incidents that could adversely impact continuity. These incidents may stem from nature, technology, or human actions, including potential threats like global pandemics or epidemics. Recognising the constant risk of disruptions, the Company has implemented a strategic Business Continuity Management plan. This proactive measure aims to mitigate the adverse effects of operational risks, specifically business disruption and system failures.

ICICI Lombard prioritises data security in compliance with ISO 27001 and ISO 27017 standards. To ensure business continuity in case of disruptions, it has implemented a tiered disaster recovery (DR) strategy.

- Tiered Application Classification: ICICI Lombard has categorised its applications into four tiers based on criticality.
- DR Activation for High-Impact Applications: Tier 1 and Tier 2 applications, considered the most critical, are operational at disaster recovery site.
- Regular DR Testing: In line with compliance requirements, ICICI Lombard conducts DR drills at least once a year for DR-enabled applications. These drills verify the effectiveness of the Company's DR plan and identify areas for improvement.
- Up-to-Date Documentation: ICICI Lombard maintains a comprehensive DR plan along with all relevant documentation. These documents are regularly reviewed and updated to reflect any changes in the Company's systems or processes.

**6. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.**

The Company's Supplier Code of Conduct encourages suppliers to adopt best practices in environmental management to minimise and mitigate the impact of their products / services / operations on external environment to the maximum extent possible. The Supplier Code of Conduct is applicable to all the material suppliers. Further, the Company engages with its Suppliers periodically to ensure compliance to this Code.

**7. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.**

The Company during the year adopted the Supplier Code of Conduct and made it applicable to its material suppliers with immediate effect. This Code requires suppliers to abide by environmental related rules and regulations, adopt best environmental management practices, track and report their performance and work in harmony with the community. The Company also engages with the suppliers periodically to encourage compliance to the Code.

## PRINCIPLE 7

Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent



## ESSENTIAL INDICATORS

### 1. a. Number of affiliations with trade and industry chambers/associations.

ICICI Lombard is a member of 3 trade and industry chamber/association.

### b. List the top 10 trade and industry chambers/associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

| Sr. No. | Name of the trade and industry chambers/ associations  | Reach of trade and industry chambers/ associations (State/National) |
|---------|--|---|
| 1       | Indian Merchants Chamber                               | National  |
| 2       | Confederation of Indian Industry                       | National  |
| 3       | Federation of Indian Chambers of Commerce and Industry | National  |

### 2. Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.

During the reporting period, the Company did not engage in any instances of anti-competitive behavior, and as a result, no corrective action was necessary.

## LEADERSHIP INDICATORS

### 1. Details of public policy positions advocated by the entity:

| S. No. | Public policy advocated | Method resorted for such advocacy | Whether information available in public domain? (Yes/No) | Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify) | Web Link, if available |
|--------|-------------------------|-----------------------------------|--|---|------------------------|
|--------|-------------------------|-----------------------------------|--|---|------------------------|

Not Applicable

ICICI Lombard actively engages in the public policy advocacy to strengthen the policy and governance framework in the sector. The Company also engages in knowledge sharing activities to help augment the social and regulatory developments. Through trade organisations and associations, the Company offers expertise to shape public policy in relevant areas.

**PRINCIPLE 8****Businesses should promote inclusive growth and equitable development****ESSENTIAL INDICATORS****1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year**

| Name and brief details of project   | SIA Notification No. | Date of notification | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes / No) | Relevant Web link   |
|---|----------------------|----------------------|---|--|---|
| Ride to Safety – Initiate on Road Safety and helmets Distribution           | NA                   | NA                   | Yes   | Yes  | <a href="https://www.icicilombard.com/corporate-social-responsibility/ride-safety">https://www.icicilombard.com/corporate-social-responsibility/ride-safety</a>           |
| Caring Hands – Initiative on eye check-up for children                      | NA                   | NA                   | Yes   | Yes  | <a href="https://www.icicilombard.com/corporate-social-responsibility/caring-hands">https://www.icicilombard.com/corporate-social-responsibility/caring-hands</a>         |
| Niranjali – Initiative on providing clean drinking water to school children | NA                   | NA                   | Yes   | Yes  | <a href="https://www.icicilombard.com/corporate-social-responsibility/niranjali">https://www.icicilombard.com/corporate-social-responsibility/niranjali</a>               |
| Healthy Villages- Initiative on PHCs strengthening                          | NA                   | NA                   | Yes   | Yes  | <a href="https://www.icicilombard.com/corporate-social-responsibility/healthy-villages">https://www.icicilombard.com/corporate-social-responsibility/healthy-villages</a> |
| Solar Panel Installations in schools  | NA                   | NA                   | Yes   | Yes  | <a href="https://www.icicilombard.com/corporate-social-responsibility/solar-panel">https://www.icicilombard.com/corporate-social-responsibility/solar-panel</a>           |

**2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:**

Not Applicable owing to the nature of business.

**3. Describe the mechanisms to receive and redress grievances of the community.**

ICICI Lombard has established a well-defined grievance mechanism to address and resolve complaints from all stakeholders. The Company actively encourages community members to report their grievances or concerns to ICICI Foundation and other NGO partners. Collaborating closely with these partners, ICICI Lombard addresses grievances and takes appropriate action.

**4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:**

| Parameter                                    | FY 2024 | FY 2023 |
|--|---------|---------|
| Directly sourced from MSMEs/ small producers | 9.5%    | 10.6%   |
| Directly from within India                   | 100.0%  | 100.0%  |

Notes:

- The calculations are derived considering payments made during the year including payment for GST netted off with TDS deducted under Income Tax Act.
- Payment made towards reinsurance ceding, reinsurance inward commission and claim loss adjustment expenses are not considered as purchases in reporting.
- Commission payment for direct business does not include payment for GST and is considered without any impact of TDS deducted under Income Tax Act.
- Identification of MSME of vendors is based on information available with the Company.

**5. Job creation in smaller towns – Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost**

| Location     | FY 2024 | FY 2023 |
|--------------|---------|---------|
| Rural        | 0.1%    | 0.2%    |
| Semi-urban   | 6.3%    | 6.5%    |
| Urban        | 22.8%   | 22.9%   |
| Metropolitan | 70.8%   | 70.5%   |

(Places are categorised as per RBI Classification System - rural / semi-urban / urban / metropolitan)

Notes:

Wages paid considers fixed contracted Cost-to-Company (with proportionate adjustment for new joiner and resigned employees during financial year) excluding variable pay, bonuses, stock options and other perks.

## LEADERSHIP INDICATORS

**1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):**

Social Impact Assessment (SIA) has been conducted for the activities implemented in FY2023. No negative impacts were identified from SIA studies reported in Principle 8: Essential Indicator, Question 1 Positive impacts from community development programmes are in the SIA reports available in the website.

**2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:**

ICICI Lombard did not undertake any CSR Initiatives in aspirational districts identified by the governing bodies.

**3. a. Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalised/ vulnerable groups? (Yes/ No)**

No, the Company does not have a preferential procurement policy. Due to the nature of the Company's business, resource consumption is limited to operational needs. In promoting inclusive growth and equitable development, the Company advocates equal opportunity for vendors, especially those from disadvantaged or marginalised groups.

**b. From which marginalised /vulnerable groups do you procure?**

Not Applicable

**c. What percentage of total procurement (by value) does it constitute?**

Not Applicable



**4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:**

Not Applicable

**5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.**

Not Applicable

**6. Details of beneficiaries of CSR Projects:**

| S. No | CSR Project   | No. of persons benefitted from CSR Projects   | % of beneficiaries from vulnerable and marginalised groups |
|-------|---|---|--|
| 1     | <b>Caring Hands</b> - The Company organises free eye check-up camps through a preventative healthcare programme, "Caring Hands" which was introduced in FY2011. The programme aims to conduct eye-care counselling and involves in spectacle distribution to children with visual defects. Over 3,000 employee volunteers are in charge of this annual programme. | During the reporting period, the project benefitted 47,000+ individuals.  | 100.0%   |
| 2     | <b>Ride to Safety</b> - This programme is a campaign for building road safety awareness among the children. Through this initiative helmets are also distributed to the beneficiaries. The Company conducted 750+ workshops in various cities throughout FY2024 raising awareness.  | No of beneficiaries: 1,75,000+<br>Helmets distributed:1,50,000  | 100.0%   |
| 3     | <b>Niranjali</b> - ICICI Lombard launched the flagship initiative "Niranjali" in FY 2017 with an objective of improved access to safe drinking water to school-children. Further the initiative also focusses on increasing awareness among the school children on clean and safe drinking water.   | The Company succeeded in installing 1,010 water purifiers at schools in FY2024, benefiting more than 1,00,000 people.                                       | 100.0%   |
| 4     | <b>Installation of solar panels in schools</b> - In accordance with India's net-zero goals, the Company started a CSR programme in FY2022, installing solar panels in the under privileged schools.   | No of beneficiaries: 50,000+  | 100.0%   |
| 5     | <b>Healthy Villages</b> - To meet the community's healthcare needs, the Company expanded the Healthy Village project to 12 Primary Health Centres (PHCs) in rural areas in FY2023.  | In FY2024 over 15,000+ people benefitted through these camps conducted across 11 PHCs where 29 equipments were provided, across three cities in Tamil Nadu. | 100.0%   |

## PRINCIPLE 9

Businesses should engage with and provide value to their consumers in a responsible manner



## ESSENTIAL INDICATORS

### 1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

The Company has a Grievance redressal mechanism in place to receive, respond and resolve all types of customer complaints. The Company also has a interactive CRM tool. The identified teams within the Company are specialised individuals equipped with proper training and skillset to handle complaints received from customers through different channels such as Bima Bharosa Portal, National Consumer Helpline and Department of Administrative Reforms and Public Grievances. The Company conducts detailed Root Cause Analyses (RCAs) for recurring complaints. These analyses helps in identifying gaps in people, processes and technology. Based on the RCA findings, appropriate remedial actions are implemented. This helps in eliminating reoccurrence of complaints pertaining to the same issue and enhance customer experience.

To ensure the prompt and efficient resolution of complaints, a comprehensive escalation process for customers has been established. This process has also been updated on the Company's website to enhance accessibility (<https://www.icicilombard.com/grievance-redressal>). Clients can utilise a three-step procedure to express their concerns:

- I. Customers have the flexibility to register their grievances through various channels, including emails, toll-free phone numbers, complaint letters and more. The Company has designated a dedicated email address, [customersupport@icicilombard.com](mailto:customersupport@icicilombard.com), to offer support to all its customers.
- II. In the event of dissatisfaction with the provided resolution, the customer has the option to directly email the Deputy Vice President of Customer Support.
- III. If the customer remains unsatisfied with the offered solution, they can escalate the matter further by sending an email directly to the Head of Customer Support.

Furthermore, the Company has established a dedicated Service Quality (SQ) division to address escalated complaints. The SQ division is authorised to promptly address any customer complaints by reaching out to the appropriate departments.

The Company's continuous efforts to streamline operations, introduce relevant products and digital technologies and advance digital solutions to decentralise services have led to a notable enhancement in customer experience and satisfaction

### 2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

Not Applicable owing to the nature of business

### 3. Number of consumer complaints in respect of the following:

|                                | FY 2024                  |                                   | Remarks   | FY 2023                  |                                   | Remarks   |
|--------------------------------|--------------------------|-----------------------------------|---|--------------------------|-----------------------------------|---|
|                                | Received during the year | Pending resolution at end of year |   | Received during the year | Pending resolution at end of year |   |
| Data privacy                   | 1                        | None                              | All the pending complaints were satisfactorily resolved after the financial year. | 1                        | 0                                 | All the pending complaints were satisfactorily resolved after the financial year. |
| Advertising                    | None                     | None                              |   | None                     | None                              |   |
| Cyber security                 | None                     | None                              |   | None                     | None                              |   |
| Delivery of essential services | None                     | None                              |   | None                     | None                              |   |
| Restrictive Trade Practices    | None                     | None                              |   | None                     | None                              |   |
| Unfair Trade Practices*        | 525                      | 7                                 |   | 270                      | 6                                 |   |
| Other**                        | 4,817                    | 142                               |   | 4,648                    | 170                               |   |

\*All complaints wherein customers alleged of "Misselling" of policy are categorised under "Unfair Trade Practices", however same were not proven.

\*\*The nature of "other" category complaints include Claim Related, Customer Grievance, Policy Coverage Related, Cancellation, Policy not received, Policy Renewal, Refund Related, Endorsement Related, Premium Related, NCB Related, Health Check Up, Proposal Related, MParivahan related, Website Related and Not related to IL.

**4. Details of instances of product recalls on account of safety issues:**

|                   | Number  | Reasons for recall |
|-------------------|---|--------------------|
| Voluntary recalls | ICICI Lombard, being an insurance company, holds no liability for voluntary or forced recalls in relation to the products and services. |                    |
| Forced recalls    |   |                    |

**5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a web-link of the policy.**

ICICI Lombard has implemented a well-organised information and cyber security framework, which guarantees the security and privacy of data by establishing comprehensive management processes across the organisation.

The Company has a robust Information and Cyber-Security (ICS) policy, duly authorised by the Board and aligned with the cyber security requirements stipulated by IRDAI (Insurance Regulatory and Development Authority of India) as well as international ISO standards. Board oversees the implementation of cyber security framework with governance managed by Information Security Committee and Risk Management Committee. The implemented systems and procedures strictly adhere to ISO 27017:2015, the security standard for cloud computing and ISO 27001:2013, the information security management system. This framework enables the business to efficiently identify and promptly eliminate any potential threats to its network, applications and infrastructure.

In addition, the Company undergoes audits by CERT-IN empaneled auditors for the IRDAI annual audit report. A team of independent internal auditors is responsible for overseeing the administration, application and effectiveness of the cyber security policy. The Company diligently perform Vulnerability Assessment and Penetration Testing (VAPT), source code reviews and application security testing on its systems at regular intervals to ensure the robustness of the security measures. The cyber security policy is housed on the organisation's intranet, providing accessibility to all internal stakeholders.

**6. Provide details of any corrective actions taken or underway on issues relating to advertising and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.**

As a responsible brand, ICICI Lombard has implemented comprehensive systems and processes to adhere to fair trade practices. The robust IT infrastructure is consistently updated to maintain the highest level of data security. Notably, there were no complaints reported during the reporting period related to advertising practices, the provision of essential services, cyber security, customer data privacy, the recurrence of product recalls, or any penalties or actions taken by regulatory authorities concerning the safety of goods or services. In this regard, no material corrective action was required to be taken by the Company in FY2024.

**7. Provide the following information relating to data breaches:**

- Number of instances of data breaches - None
- Percentage of data breaches involving personally identifiable information of customers - 0.0%
- Impact, if any, of the data breaches - Not Applicable

## LEADERSHIP INDICATORS

### 1. Channels/ platforms where information on products and services of the entity can be accessed (provide web link, if available).

The Company's commitment is to deliver a comprehensive and consistent service experience at every touchpoint and throughout all stages of the customer life cycle. As part of its transition to paperless operations, the Company has introduced innovative channels, including the website, mobile app and instant messaging platform like WhatsApp, to facilitate easy communication with the customers. These diverse channels address customer service needs throughout the entire life of their policy with ICICI Lombard, spanning from policy purchase to claim settlement and renewal. Additionally, to enhance insurance awareness among both customers and the wider public, the Company has initiated various programs aimed at improving awareness and understanding of insurance-related matters.

Information regarding all products and services offered by ICICI Lombard can be accessed on the Company's official website: <https://www.icicilombard.com>.

Various customer channels are available, ensuring a seamless experience:

#### 1. **Company Website:**

The official website, [www.icicilombard.com](https://www.icicilombard.com), serves as a comprehensive platform providing end-to-end solutions. Customers can avail in various services, including policy purchase, renewal, policy upgrades, claim intimation and more. The Company's website acts as an informative resource, offering complete details of products and services and serves as a knowledge base to educate customers on the benefit of their policies and provide assistance in their insurance related queries.

#### 2. **IL TakeCare App:**

The IL TakeCare app serves as a one-stop solution for ICICI Lombard policyholders, covering health, motor, travel insurance and wellness needs. It includes features such as viewing/downloading policies, information on coverage and benefits, uploading medical records, claim intimation, diet and exercise tracking, step count and sleep hours monitoring, online chat with nutritionists and fitness experts, second opinions on health queries and 24/7 IL doctor support, ensuring an excellent customer experience.

#### 3. **RIA (Responsive & Intelligent Assistant):**

RIA, the AI-enabled chatbot with machine learning capabilities and natural language processing, acts as a human avatar on instant messaging platforms like WhatsApp and Telegram. It creates a personal connection with customers, using cutting-edge technology to process natural language inputs. Equipped with an intent-mining module, RIA ensures a great conversational experience for customers. Once the context is perceived, RIA can activate menus that are most closely related to the inputs making her extremely prompt in communicating to customers. Conversational AI when supported by NLP, bridges the divide between the monotony of automation and the personal attention associated with human connection.

#### 4. **Service Video:**

To empower customers in resolving queries independently, the Company has introduced well-crafted customer service videos. These videos, featuring thoughtful visual depictions, capture the audience's attention and have a high recall value. They serve as a resourceful tool for conveying complex and lengthy processes in a simple and engaging manner, gaining popularity among customers.

#### 5. **WhatsApp:**

The Company provides wide range of services on WhatsApp Channel such as policy document, claim status, claim intimation, endorsement, renewal, break-in survey, etc in Hindi and English languages. The Company also share links of videos to customers through WhatsApp to increase awareness about its services and processes.

**2. Steps taken to inform and educate consumers about safe and responsible usage of products and/ or services.**

ICICI Lombard ensures thorough communication with customers to provide accurate information on product benefits, features and terms to prevent misstatements. The implemented insurance awareness policy outlines customer rights. The Info Centre Tab on the website offers detailed information, including policy downloads and FAQs. Customers are also educated on tax benefits that are available for the products of the Company. The Fair Practices Code and Code of Conduct for Customers can be accessed on the website through this link: <https://www.icicilombard.com/docs/default-source/default-document-library/code-of-conduct.pdf?sfvrsn=0>.

**3. Mechanisms in place to inform consumers of any risk of disruption/ discontinuation of essential services.**

With its robust business continuity plan, the Company to prevent significant disruptions in its operations. During the pandemic, the Company established a dedicated COVID-19 support helpline to enhance customer assistance through which the active support is delivered till date. Also, all online portals such as Website/ILTakeCare Application and WhatsApp services that the Company offers ensured that customers could continue to be served during lockdowns.

In the event of any potential interruption or discontinuation of crucial services, the Company informs consumers through written notifications or call center, providing relevant justifications. When a product or service is discontinued, various communication channels are utilised to inform customers, including the Company's website, where withdrawn products are listed and accessible at <https://www.icicilombard.com/legal/products-withdrawn>.

**4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief. Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

Yes, The Company, prioritises transparency by providing stakeholders with relevant details and information. The Company prominently displays IRDAI Circulars and GRO contact details in its offices. Additionally, its website features comprehensive product information, including details, features, FAQs and a grievance mechanism. The Company also offers assistance to customers in utilising specific risk-minimisation measures through health-focused blogs and videos.

Further the Company conducts satisfaction surveys to seek feedback from customers at key stages, including policy purchase, renewal, cashless claim and reimbursement claim processes. This valuable input serves to enhance systems, refine processes and allows it to concentrate on training and development initiatives, ultimately improving the overall customer experience. Resultantly the NPS (claims) score for FY2024 is 67 up from 64 in FY2023.

## GLOSSARY FY2024

|   |  |
|---|--|
| <b>AI</b> – Artificial intelligence                             | <b>LTIFR</b> – Lost Time Injury Frequency Rate                     |
| <b>BCM</b> – Business Continuity Management                     | <b>MCA</b> – Ministry of Corporate Affairs                         |
| <b>BMC</b> – Brihanmumbai Municipal Corporation                 | <b>ML</b> – Machine Learning                                       |
| <b>BOD</b> – Board of Directors                                 | <b>Mn</b> – Million  |
| <b>BRSR</b> – Business Responsibility and Sustainability Report | <b>MSME</b> – Micro, Small and Medium enterprises                  |
| <b>CAPEX</b> – Capital Expenditure                              | <b>MTCO<sub>2</sub></b> – Metric tons of carbon dioxide            |
| <b>CIA</b> – Confidentiality, Integrity and Availability        | <b>NA</b> – Not Applicable   |
| <b>CII</b> – Confederation of Indian Industry                   | <b>NGRBC</b> – National Guidelines on Responsible Business Conduct |
| <b>CoC</b> – Code of Conduct                                    | <b>NGO</b> – Non Government Organisation                           |
| <b>CRM</b> – Customer Relationship Management                   | <b>NIC</b> – National Industrial Classification                    |
| <b>CSR</b> – Corporate Social Responsibility                    | <b>NLP</b> – Natural Language Processing                           |
| <b>DC</b> – Designated Consumers                                | <b>NPS</b> – Net Promoter Score                                    |
| <b>DEI</b> – Diversity, Equity & Inclusion                      | <b>PAT</b> – Performance, Achieve and Trade                        |
| <b>DIN</b> – Director Identification Number                     | <b>PF</b> – Provident Fund   |
| <b>E-waste</b> – Electronic Waste                               | <b>PHC</b> – Primary Health Centre                                 |
| <b>EPR</b> – Extended Producer Responsibility                   | <b>POSH</b> – Prevention of Sexual Harassment                      |
| <b>ESG</b> – Environmental, Social and Governance               | <b>R/O</b> – Risk or Opportunity                                   |
| <b>ESI</b> – Employee's State Insurance                         | <b>R&amp;D</b> – Research & Development                            |
| <b>FAQ</b> – Frequently Asked Questions                         | <b>R&amp;R</b> – Rehabilitation and Resettlement                   |
| <b>FCU</b> – Fraud Control Unit                                 | <b>RI</b> – Reinsurance  |
| <b>GHG</b> – Greenhouse Gases                                   | <b>RIA</b> – Responsive & Intelligent Assistant                    |
| <b>GJ</b> – Gigajoule   | <b>RM</b> – Risk Management  |
| <b>GRI</b> – Global Reporting Initiatives                       | <b>RPT</b> – Related Party Transaction                             |
| <b>GST</b> – Goods and Services Tax                             | <b>SASB</b> – Sustainability Accounting Standards Board            |
| <b>HIRA</b> – Hazard Identification and Risk Assessment         | <b>SEBI</b> – Securities and Exchange Board of India               |
| <b>HR</b> – Human Resources                                     | <b>SIA</b> – Social Impact Assessments                             |
| <b>ICS</b> – Information and Cyber-Security                     | <b>SOP</b> – Standard Operating Procedures                         |
| <b>III</b> – Insurance Institute of India                       | <b>SPOC</b> – Single Point of Contact                              |
| <b>IL</b> – ICICI Lombard General Insurance Company Limited     | <b>SQ</b> – Service Quality  |
| <b>IRDAI</b> – Insurance Regulatory and Development Authority   | <b>T&amp;D</b> – Transmission and Distribution                     |
| <b>ISO</b> – International Organisation for Standardisation     | <b>UT</b> – Union Territory  |
| <b>KMP</b> – Key Managerial Personnel                           | <b>WB</b> – Whistle Blower   |
| <b>LCA</b> – Life Cycle Assessment                              | <b>WFH</b> – Work from Home  |
| <b>LED</b> – Light-emitting Diode                               |  |



# INDEPENDENT PRACTITIONER'S REASONABLE ASSURANCE

## PKF SRIDHAR AND SANTHANAM LLP Chartered Accountants

### Independent Assurance Report

Independent practitioner's reasonable assurance report on Identified Sustainability Indicators in ICICI Lombard General Insurance Company Limited's Business Responsibility and Sustainability Report

To the Board of Directors of ICICI Lombard General Insurance Company Limited

1. We performed reasonable assurance engagement for ICICI Lombard General Insurance Company Limited (the 'Company') vide our Engagement Letter dated April 10, 2024 in respect of the Greenhouse Gas- Scope 3 emissions and other agreed indicators / parameters listed in Annexure 1 (the 'Identified Sustainability Indicators'), identified per Securities and Exchange Board of India (the 'SEBI')'s circular number SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated 12 July 2023 read with paragraph 34(2)(f) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 as amended (the 'SEBI LODR Regulations') (hereinafter referred as to the "BRSR Criteria"). These indicators / parameters are included in the Business Responsibility and Sustainability Report ('BRSR') of the Company for the year ended March 31, 2024.

### Management's Responsibility

2. The Company's Management is responsible for selecting or establishing suitable criteria for preparing the Sustainability Information, taking into account applicable laws and regulations related to reporting on the Sustainability Information, the identification of key aspects, engagement with stakeholders, content and presentation of the Business Responsibility and Sustainability Report in accordance with the BRSR Criteria mentioned above. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation of the Business Responsibility and Sustainability Report and measurement of Identified Sustainability Indicators, which are free from material misstatement, whether due to fraud or error.
3. The Company's Management is also responsible for ensuring that methodologies / assumptions for calculation of Identified Sustainability Indicators as included in Annexure - 1 are appropriately disclosed in BRSR Reporting.
4. The Board of Directors are also responsible for overseeing the Company's BRSR reporting process.

### Inherent Limitations

5. The absence of a significant body of established practice on which to draw to evaluate and measure non-financial information allows for different, but acceptable, measures and measurement techniques and can affect comparability between entities.
6. Non-financial performance information is subject to more inherent limitations than financial information, given the characteristics of the subject matter and the methods used for determining such information. The precision of different measurement techniques may also vary.

### Our Independence and Quality Control

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India and have the required competencies and experience to conduct this assurance engagement.



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PKF SRIDHAR & SANTHANAM LLP is a registered Limited Liability Partnership with LLPIN AAB-6552 (REGISTRATION NO. WITH ICAI IS 003990S/S200018)

8. The firm applies Standard on Quality Control (SQC) 1, "Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements", and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

#### Independent Practitioner's Responsibility

9. Our responsibility is to express a reasonable assurance conclusion on the Identified Sustainability Indicators based on the procedures we have performed and evidence we have obtained. Reasonable assurance is a high level assurance, but it is not a guarantee that an examination conducted in accordance with standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, that could reasonably be expected to influence the decisions of users taken on the basis of Identified Sustainability Indicators.
10. We conducted our examination of the Identified Sustainability Indicators in accordance with the Standard on Sustainability Assurance Engagements (SSAE) 3000, "Assurance Engagements on Sustainability Information", issued by the Sustainability Reporting Standards Board of the Institute of Chartered Accountants of India. This standard requires that we plan and perform our engagement to obtain reasonable assurance about whether the Identified Sustainability Indicators are prepared, in all material respects, in accordance with the BRSR Criteria. A reasonable assurance engagement involves assessing the risk of material misstatement of the Identified Sustainability Indicators whether due to fraud or error, and responding to the assessed risk as necessary to the circumstances.
11. The procedures we performed were based on professional judgement and included inquiries, observation of processes performed, inspection of documents, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling the underlying records. Given the circumstances of the engagement, in performing these procedures, we;
  - a. Obtained an understanding of the Identified Sustainability Indicators and related disclosures,
  - b. Obtained an understanding of the assessment criteria and their suitability for the evaluation and /or measurement of the Identified Sustainability Indicators.
  - c. Made enquiries of Company's management and those with responsibility for managing Company's BRSR Reporting
  - d. Understood and evaluated the design of the key structures, systems, processes and controls for managing, recording and reporting on the Identified Sustainability Indicators, but did not include testing the operating effectiveness of management systems and controls.
  - e. Based on that understanding and the risk that the Identified Sustainability Indicators may be materially misstated, determined the nature, timing and extent of further procedures
  - f. Performed substantive testing on a selective basis of the Identified Sustainability Indicators to check that data had been appropriately measured, recorded, collated and reported;
  - g. Checked consolidation for various sites/offices and corporate offices for ensuring the completeness of data being reported
  - h. Reviewed records and performed testing including recalculation for sample data to establish an assurance trail
  - i. Reviewed the level of adherence to the reporting criteria and the reporting framework followed by the company in preparing the BRSR Report
  - j. Reviewed the Integrated Report for detecting, on a test basis, any major anomalies between the information reported in the BRSR Report on performance with respect to Identified Sustainability Indicators and relevant source data/information





- k. Ensured that methodology / assumptions used by management in preparation of data for reporting of Identified Sustainability Indicators are appropriately included in Annexure - 1.

#### Exclusions

12. Our assurance scope excludes:

- Data / information for factors not under Operational Control of the Company other than Greenhouse Gas – Scope 3 emissions.
- Aspects of the BRSR Report and the data/information (qualitative or quantitative) other than the Identified Sustainability Indicators.
- Data and information outside the defined reporting period i.e. April, 2023 to March, 2024 and comparative data included in the BRSR report.
- The statements that describe the expression of opinion, belief, aspiration, expectation, aim or future intentions provided by the Company.

13. Comparative information for the year ended March 31, 2023, is neither audited or reviewed by us or any other Chartered Accountant except for limited review of Greenhouse Gas – Scope 1, Scope 2 and Scope 3 Emissions by Deloitte Haskins & Sells LLP on which an unqualified conclusion dated 5 June 2023 was provided.

Our opinion is not modified with respect to above matters.

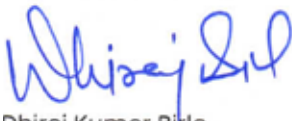
#### Opinion

14. Based on the procedures we have performed and the evidence we have obtained, the Identified Sustainability Indicators for the year ended 31 March 2024 (as stated under "Identified Sustainability Indicators") are prepared in all material respects, in accordance with the BRSR Criteria.

#### Restriction on use

15. Our Reasonable Assurance report has been prepared and addressed to the Board of Directors of the Company at the request of the company solely, to assist the company in reporting on Company's BRSR and inclusion in its integrated report. Accordingly, we accept no liability to anyone, other than the Company. Our report should not be used for any other purpose or by any person other than the addressees without our written consent. The firm neither accepts nor assumes any duty of care or liability for any other purpose or to any other party to whom our report is shown or into whose hands it may come without our prior consent in writing.

For PKF Sridhar & Santhanam LLP  
Chartered Accountants  
Firm Registration No: 003990S/S200018

  
Dhiraj Kumar Birla  
Partner  
Membership No: 131178  
UDIN: 24131178BKJBR7839



Date: June 01, 2024  
Place: Mumbai

## **FORWARD-LOOKING STATEMENTS**

The report contains statements that relate to the Company's future operations and performance. These statements can be identified by the usage of words such as 'believes', 'estimates', 'anticipates', 'expects', 'intends', 'may', 'will', 'plans', 'outlook' and other words of similar meaning in connection with a discussion of future operating or financial performance. These forward-looking statements are dependent on assumptions, data or methods that may be inaccurate or imprecise and hence are not guarantees of future operating, financial and other results. They constitute our current expectations based on reasonable assumptions. The Company's actual results could materially differ from those projected in any forward-looking statements due to various future events, risks, and uncertainties some of which are beyond our control. The Company does not assume any obligation to update or revise any forward-looking statements, whether as a result of new information, future events or otherwise.

