

ICICI LOMBARD GENERAL INSURANCE COMPANY LIMITED

Corporate Social Responsibility Policy

Corporate Social Responsibility (“CSR”) is the commitment of companies to provide resources and support activities focused on enhancing economic and social development. It is the effort made by companies to improve the living conditions of the local area in which they operate and the society at large. The activities taken up as a part of corporate social responsibility reflect the intent to create a positive impact on society without seeking any commensurate monetary benefits.

CSR has been a long-standing commitment at the Company and forms an integral part of its activities. Being a responsible corporate citizen, the Company is committed to perform its role towards the society at large. In alignment with its vision, the Company always works towards adding value to its stakeholders by going beyond business goals and contributing to the well-being of the community. Its contribution to social sector development includes several pioneering interventions and is implemented through the involvement of stakeholders within the Company, the Group and the broader community.

ICICI Group established the ICICI Foundation for Inclusive Growth (ICICI Foundation) in 2008 with a view to significantly expand the ICICI Group’s activities in the area of CSR. Over the last few years, ICICI Foundation has developed significant projects in specific areas and has built capabilities for direct project implementation as opposed to extending financial support to other organizations.

ICICI Foundation has undertaken several CSR initiatives for the Company as well in the past.

The Company’s objective is to pro-actively support meaningful socio-economic development. The Company works towards developing an enabling environment that will help citizens realize their aspirations towards leading a meaningful life. Its aims to identify critical areas of development contributing to the well-being of the community and benefitting them over a period of time.

The Corporate Social Responsibility Policy (CSR Policy) of the Company sets out the framework guiding the Company’s CSR activities. The Policy also sets out the rules that need to be adhered to while taking up and implementing CSR activities.

A. Scope of Corporate Social Responsibility Policy

- The policy would pertain to all activities undertaken by the Company towards fulfilling its corporate social responsibility objectives. The policy would also ensure compliance with section 135 of the Companies Act, 2013, applicable rules or directives or guidelines issued by competent entities / concerned legislation from time to time.

B. Governance Structure

- The Corporate Social Responsibility Committee (CSR Committee) is the governing body that will define the scope of CSR activities for the Company and ensure compliance with

the Policy. The CSR Committee would comprise of three or more Directors including at least one independent Director. The Company has a CSR & Sustainability Committee which is duly constituted in accordance with the provisions of the Act with respect to its composition and terms of reference.

The CSR Committee shall:

- i. Formulate the CSR policy and recommend to the Board and any amendments thereto.
- ii. Indicate the activities to be undertaken by the Company in areas or subject, specified in Schedule VII of Section 135 of Companies Act
- iii. Review and recommend the annual CSR plan to the Board.
- iv. Monitor the CSR activities and compliance with the CSR policy from time to time
- v. Review and implement, if required, any other matter related to CSR initiatives as mandated under the Act and Rules issued thereto.
- vi. The Committee shall meet at least twice in every financial year.

The Board of Directors shall:

- i. Approve the CSR Policy based on the recommendation of the CSR Committee.
- ii. Approve the CSR activities and annual CSR plan based on the recommendation of the CSR & Sustainability Committee; and
- iii. The CSR Policy shall be subject to review by the CSR & Sustainability Committee / Board on an Annual basis or earlier in case of material change in the underlying law(s).

C. Operating Framework

1. CSR activities will be undertaken in areas identified by the CSR & Sustainability Committee, the Company can undertake activities that qualify as CSR under Schedule VII of the Companies Act, 2013 and rules relating to CSR as amended from time to time.
2. An annual CSR plan shall be presented to the CSR Committee and, based on its recommendations to the Board of Directors of the Company for approval.
3. CSR activities may be undertaken by the Company, or by ICICI Foundation.
4. Contributions by the Company to ICICI Foundation will form part of the Company's CSR outlay.
5. Activities undertaken by the Company may be implemented directly by the Company as well as by not-for-profit entities other than ICICI Foundation. Such entities and projects shall be supported after ascertaining the credibility of the agency and its track record in implementing projects. The entity shall generally have a track record of three years in implementing such projects. The implementing agencies to be engaged for CSR projects

should be in accordance with the criteria as specified under Companies Act and Companies (CSR Policy) Rules, 2014

5.1 Activities proposed to be undertaken by the Company can be taken forward directly or through ICICI Foundation or any eligible implementing entities as listed below:

a. Category I: Entity established by the Company itself or along with any other company – a Company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company; or

b. Category II: Entity established by the Central Government or State Government - a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or

c. Category III: Statutory bodies - any entity established under an Act of Parliament or a State legislature; or

d. Category IV: Public agencies - a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

5.2. The implementing entities have to be registered with the Central Government by filing form CSR-1.

5.3. The Company may also collaborate with other companies for undertaking CSR projects in such a manner that project reporting is separate and in accordance with the CSR rules

6. The responsibility for implementation of identified activities/ projects shall be as per the organizational structure of the Company and as approved by the CSR & Sustainability Committee and the Board.

7. The Annual Plan shall incorporate the following:

i. The prescribed outlay on CSR as per the Act and related rules as amended from time to time.

ii. Key CSR activities proposed to be undertaken during the year, including analysis of their eligibility for classification as CSR under Schedule VII of the Act and related rules as amended from time to time, their conformity with the CSR Policy and their implementation schedules. Provided that the Company may directly or via ICICI Foundation or any other eligible entity undertake other eligible activities.

iii. Proposed outlay on each activity including expenditure on administrative overheads both directly and indirectly including employee costs.

iv. The manner of execution of the project or programme.

- v. Modalities of utilisation of funds and implementation of schedule for the projects
 - vi. Mechanism of monitoring and reporting of the activities.
 - vii. Activities to be undertaken by ICICI Foundation and Company's contribution to ICICI Foundation.
 - viii. Activities to be undertaken by the Company directly.
 - ix. Activities to be undertaken by other entities and Company's contribution to such entities; and
 - x. Impact Assessment through an independent third party of activities that have completed at least one year and meet specific conditions as prescribed in the Act and related rules as amended from time to time; and.
 - xi. Aggregate proposed outlay and reasons for shortfall, if any, compared to the prescribed outlay.
- 8.** The authority to incur expenditures under the above plan shall be as per the approved Delegation of Financial Powers in Company. Similarly, expenditure shall be incurred by ICICI Foundation based on its approved internal authorizations.
- 9.** Funds would be disbursed either in tranches or as one-time payment. The terms, conditions and timing of disbursement would be conditional upon the nature and requirement of the CSR project or program.
- 10.** The Company may make contributions to the government funds specified in Schedule VII of the Act or any other entity or fund after due verification of the implementing agency and conformity to the activities approved by the Board.
- 11.** The Surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of a company.
- 12.** Surplus arising from CSR activities will be ploughed back into the same project, or transferred into the Unspent CSR Account and spent as per the CSR Policy and annual action plan or transferred to a fund specified in Schedule VII of the Act, within a period of six months of the end of the financial year.
- 13.** Pursuant to an ongoing project, any amount remaining unspent in a financial year would be transferred within a period of thirty days from the end of the financial year to the Unspent CSR Account and such amount will be spent within a period of three financial years towards the project. In the event the amount is not spent, it will be transferred to a fund specified in Schedule VII of the Act within 30 days from the date of completion of the third financial year.
- 14.** Pursuant to CSR spending on other than on-going projects, any amount remaining unspent in a financial year would be transferred to a fund specified in Schedule VII of the Act within six months of the end of the financial year.

D. Monitoring

The CSR Committee shall ensure a transparent monitoring mechanism for CSR activities

1. The progress of the CSR activities shall be reviewed at least twice a year, including the annual review by the CSR & Sustainability Committee.
2. The Chief Financial Officer shall be responsible for monitoring expense on CSR activities with respect to the plan and submission of the same to the CSR & Sustainability Committee and the Board.
3. The Board of Directors shall review the progress of CSR activities from time to time.
4. The Board shall
 - a. Satisfy itself that the funds so disbursed have been utilised for the purpose and in the manner as approved by it and The Chief Financial Officer of the Company shall certify to the utilisation and manner of utilisation of the funds disbursed by Company for the purposes of CSR.
 - b. For any ongoing project, shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modification, if any required.
5. The Governing Council of ICICI Foundation will oversee the activities of ICICI Foundation for Inclusive Growth (ICICI Foundation).
6. The Company shall undertake impact assessment of significant projects as approved by the Board in the CSR action plan and as per extant rules and regulations.

E. Disclosure

The Company shall include in its Annual Report, the following information on CSR:

- i. A description of contents of the CSR policy.
- ii. An overview of the CSR activities.
- iii. The composition of the CSR & Sustainability Committee.
- iv. Average net profit for the immediately preceding three financial years as per section 135(5).
- v. Two percent of the average net profit of the Company as per section 135(5), surplus arising out of the CSR projects, amount required to be set off for the financial year, total CSR obligation for the financial year;
- vi. Prescribed CSR expenditure.
- vii. Details of amount spent in the prescribed format.

- viii. Amount unspent, if any, and reasons for not spending the amount.
- ix. Details of creation or acquisition of capital asset.
- x. Responsibility statement of the CSR Committee that the implementation and monitoring of the CSR Policy is in compliance with the CSR objectives and CSR Policy.
- xi. Such other matters as may be specified from time to time for inclusion in the annual report.
- xii. The above relevant information shall also be displayed on the Company's website.

F. Corporate Social Responsibility Activities

The projects or programmes to be undertaken by the Company as CSR in India will be considered and approved by the CSR & Sustainability Committee of the Company. Any project or program that is exclusively for the benefit of Company's employees would not be considered as CSR. While the major CSR activities will be undertaken in focus areas identified by the CSR Committee, the Company may undertake activities that qualify as CSR under Schedule VII of the Companies Act, 2013 and rules relating to CSR, as amended from time to time.

Projects or programmes undertaken shall be either on-going projects of over one year or projects completed within the financial year.

The primary focus areas for the Company's for CSR activities are:

1. Healthcare

(Schedule VII (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation and making available safe drinking water; (iii) Promoting gender equality, empowering women, setting up measures for reducing inequalities faced by socially and economically backward groups; (x) Rural development projects)

The healthcare challenge in India spans a number of dimensions, including access to affordable healthcare for the poor; awareness of health issues & available facilities/ benefits among the less privileged segments of society and specific vulnerable sections of the population etc.

Addressing this challenge is essential to achieve the objective of inclusive growth. The Company will directly or with the support of ICICI Foundation focus on developing innovative models with the potential to scale up and bring about improvements in the delivery of healthcare to the marginalized sections of society. These will seek to enhance the availability of affordable healthcare to low income households and improve health seeking behaviour among low income and vulnerable groups. Sanitation being a key enabler to healthcare, the Company will focus on initiatives with regards to improving sanitation in specific areas including in schools. Company will also drive wellness and preventive healthcare apart from promoting access to health cover with the aim to reduce the incidence rates of specific hazards or events.

The Company in association with non-profit organizations will target specific geographies and population segment in the health care ambit of CSR. The Company will concentrate on reducing diseases rates and promote awareness through continuous and planned intervention.

The Company will also pursue regular activities of health check-ups for municipal school students and other remote areas of the country as also other social initiatives towards health care.

The Company will also continue to support and provide relief measures during the crisis or other pandemic situation which may include contribution to authorized funds.

2. Road Safety

(Schedule VII (ii) under “promoting education”- “Educating the Masses and Promotion of Road Safety awareness in all facets of road usage”; under “vocational skills”- For drivers training etc)

Road Safety is emerging as a critical social concern of the country. Lack of professional driver training and positive behavioural culture amongst the driving community is one of the major causes.

Shouldering the responsibility of enhancing road safety, the Company under the CSR mandate will organise road safety programs and drive initiatives focusing on lowering incidence rates of road accidents. The Company will target diverse segments including drivers, passengers and pedestrians to bring about a change in their behaviour.

Extending the scope of work, the Company would also pursue initiatives aimed at creating awareness for and inculcating the right road safety habits among children. The Company will conduct awareness programs and distribute safety aids thus inculcating safe driving habits/ road behaviour among the target audience.

3. Education

(Schedule VII (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects; “Consumer Protection Services” - providing effective consumer grievance redressal mechanism; protecting consumer’s health and safety, consumer service, support and complaint resolution; consumer protection activities; consumer rights to be mandated; “all consumer protection programs and activities” on the same lines as Rural Development, Education etc.)

Education represents a critical area of action to realize India’s growth potential as also make it inclusive, by enabling citizens across population age groups to have access to quality education that equips them for taking up higher education or job-oriented skill training or provides them with requisite knowledge to improve their quality of life.

Company, both directly and through ICICI Foundation, will continue to work with state governments and other not-for-profit organisations to improve the quality of education or perform facilitating programs in government and municipal schools, which account for the vast majority of school-going children in the country. Company will also continue to work with

institutes of higher education for focused capacity-building in specified disciplines, particularly insurance.

With the growth and rising complexity of financial needs and available products & services, financial education & counselling is a key area requiring attention. Lack of financial literacy and thereby lack of understanding of General Insurance products prevent customers from taking undue risks related to their personal assets which can derail their financial status in case of an untoward event. It is critical to make the population at large aware of and get access to insurance schemes that act as risk mitigation tools. Company will continue to work to improve the quality of consumer education and awareness along with various consumer protection initiatives. The Company will also partner with the regulator IRDAI and industry bodies including General Insurance Council and support any programs aimed in this area.

4. Skill Development and Sustainable Livelihoods

(Schedule VII (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects; (iii) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups)

Enabling India's youth to gain skills that can provide employment is key to realizing the potential of India's demographic dividend and driving inclusive growth. Improving employability of the youth from lower-income sections of society is hence an important focus area.

The ICICI Academy for Skills has been set up across the country to provide job-oriented skill training to youth. Several centers have been set up across the country. In this initiative, ICICI Foundation is also leveraging the skills and training capabilities of large corporates in developing training modules in their respective domains. ICICI Foundation is also liaising with corporates and businesses to get the trained youth employed, through a job portal.

Any other activity carried out by ICICI Foundation within the scope shall form part of the CSR activities of the Company.

The Company will continue to partner with ICICI Foundation in such skill development and sustainable livelihood initiatives.

5. Support Employee Engagement in CSR activities

The Company supports the involvement of its employees in CSR activities. Company will encourage employees to participate in CSR activities of the Company and ICICI Foundation. An ongoing initiative by the Company to involve employees in social initiatives is the 'Caring Hands' campaign where free health, eye check-ups are conducted for municipal school kids across the country. With the aim to address the concerns of wellness and health of underprivileged kids, the Company has been organizing such camps every year since 2011.

The Company will work towards expanding the scope of the initiative to extend benefit to larger geographies, communities, and population.

6. Environmental Projects

(Schedule VII (iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water, including contribution to Clean Ganga Fund set up for rejuvenation of river Ganga)

Protecting environmental resources and ensuring adoption of environment-friendly practices is important to ensure sustainable and self-sustaining local economies. The Company will focus on activities promoting environmental sustainability. This can include activities relating to solar panel installation, soil conservation, water harvesting, management of natural resources, sustainable agricultural practices and other eligible activities. Encouraging families to become self-sufficient and creating an ecosystem that is environmentally and socially sustainable may be another focussed initiative. The Company may also work on maintaining/improving the ecology, afforestation, waste water recycling, animal welfare, addressing human-wildlife conflict and other eligible areas.

7. Rural Development Through Financial Inclusion and Literacy

(Schedule VII (iii) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups (x) Rural development projects)

The Company strongly believes that to improve the overall economic condition of the low-income population and to empower them with means to overcome adversities or inequalities, access to financial literacy and services is an important factor. Increasing the participation of the rural population as well as the urban poor and migrant workers in the economic mainstream is imperative for India to leverage its growth potential. The Company recognizes the need for critical interventions in promoting rural development and will initiate programmes that would empower the rural people. The Company can also work in areas relating to financial literacy, insurance awareness, digital literacy, counselling and inclusion. \

The Company's initiatives in this area include using various channels like branches and business correspondents, and leveraging technology, to make insurance services accessible to low-income groups and the rural population, including the urban poor and migrant workers. The Company will continue to focus on further expanding outreach and increasing the insurance penetration with special focus on rural and under-banked/unbanked areas. The Company will also promote use of technology and digital channels to enable low cost and convenient financial access.

8. Other Areas

The Company will continue to provide support to specific needs such as during natural disasters or epidemic or pandemic situation through financial as well as logistical support.

Further, the Company can support any other activities that are conforming to Schedule VII of the Act as amended from time to time, and any new areas that may be notified by the government and qualify for CSR, with due intimation/approval of the Committee and Board.

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