

NIVA BUPA HEALTH INSURANCE COMPANY LIMITED

CORPORATE SOCIAL RESPONSIBILITIES (CSR) POLICY

Approved Date: May 10, 2024
Version: V.01

1. **PREAMBLE**

- 1.1 Corporate Social Responsibility has been an area of focus for Niva Bupa Health Insurance Company Limited, (“**Company**”) since inception. The Company has given this priority and effected positive change in the quality of life of the underserved in keeping with the Group philosophy.
- 1.2 The Companies Act brings emphasis on CSR with Rules that provide guidance on minimum CSR spend, reporting mechanism, review structure and reporting to the shareholders of the Company. A Committee has been formed at the Board level to oversee CSR Activities of the Company.
- 1.3 Further to the above stated, the Board is to approve this CSR Policy which has been formulated and proposed by the Committee with an objective to outline its CSR focus areas, recommending the amount of CSR Expenditure, execution process, review & monitoring mechanism and, reporting process to the Management and the Board of Directors of the Company.

2. **PHILOSOPHY & OBJECTIVES**

The Company has the vision to build ‘the most admired health insurance Company’ by securing the health of our customers and the Company’s mission ‘to help customers live healthier, more successful lives’. It aims to be committed to social causes and relevance for its inclusive growth and to contribute to society by supporting causes on the health and well-being platform.

3. **DEFINITIONS AND INTERPRETATIONS**

Board means the board of directors of the Company;

Committee means the CSR, ESG and climate change committee of the Company;

Companies Act means the Indian Companies Act, 2013, along with amendments thereto;

CSR means Corporate Social Responsibility;

CSR Activities means the permissible CSR activities as per Schedule VII;

CSR Rules means the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time;

CSR Expenditure shall mean the CSR expenditure proposed under this Policy and providing the corpus amount in furtherance of this Policy;

Estimated CSR Expenditure shall mean the actual estimate of the CSR Expenditure for each year as has been approved for each year;

FY means financial year;

Policy means this corporate social responsibility policy;

MCA means Ministry of Corporate Affairs;

Quarter means a quarter for each financial year; and

Schedule VII means the schedule VII under the Companies Act.

4. **CSR IDENTIFIED SECTORS AND CSR ACTIVITIES**

The Company shall undertake CSR Activities in all or any of the CSR Activities as per Schedule VII of the Companies Act and related notifications/circulars issued by MCA, however, it intends to focus on the following areas:

4.1 **Health, hygiene and sanitation**

- (a) Supporting and facilitating surgery and high-end treatment for underprivileged Indian patients.
- (b) Preventive healthcare for underprivileged Indian patients in identified geographies.
- (c) Health camps including immunization camps for underprivileged in identified geographies the Company has its presence.
- (d) Blood donation camps in agency offices of the Company.
- (e) Disability support including artificial limbs and polio calipers support.
- (f) Health awareness, including cancer awareness prevention, screening and treatment support for the needy.
- (g) Personal hygiene training and support in those villages which have been adopted by the Company and in those locations where health and immunization camps are organized by the Company.
- (h) Environmental awareness and care in and around the selected areas of operations of the Company. Propagation of a clean healthy environment to ensure good health. Encourage and facilitate plantation drives.
- (i) Waste management and correct waste disposal – awareness and implementation primarily in adopted villages and in identified locations where the Company has its offices.
- (j) Clean drinking water primarily in adopted villages and schools for underprivileged children.
- (k) Sewerage system and management in adopted villages.

4.2 **Nutrition**

- (a) Awareness on how to ensure true nutritious meal to family.
- (b) Vitamin A (children 0-5 years) and other supplements for underprivileged women and children.
- (c) Nutritional support through NGOs to underserved children.

4.3 **Livelihood**

- (a) Vocational training and creating & supporting Self Help Groups for women, adolescent girls and youth in villages adopted by the Company. The

vocations for which training will be provided will be focused on health related issues where possible, identified basis the inherent skill sets and commercial opportunities for those vocations in and around the adopted villages.

4.4 **Health insurance awareness**

- (a) Health insurance awareness for students in schools and colleges through simple to understand material in identified locations where the Company has its offices.
- (b) Health insurance awareness to underprivileged in cities where the Company has owned offices and villages adopted by the Company.
- (c) Encourage households to enrol in Government promoted health insurance schemes.

4.5 **Education**

- (a) Provide support to schools to promote education by providing books, education aids, black boards and equipment for sports & other extra-curricular activities and basic infrastructure.
- (b) Education support should be provided in villages adopted by the Company and volunteering activities under Pehal.

4.6 **Disaster Support**

- (a) Provide material and financial support to local communities in case of any disaster.

5. **COMMITTEE CONSTITUTION AND ROLE**

- 5.1 The Committee shall consist of at least 3 (three) directors of the Company. The number of members of the Committee and their powers and functions can be specified, varied, altered or modified from time to time by the Board, subject to the provisions of the Companies Act and the CSR Rules.
- 5.2 The Committee shall hold at least 1 (one) meeting in each Year. The quorum for the meeting of the Committee shall be minimum of 2 (two) members of the Committee. The Committee meetings shall be held at the registered office or at any other place as may be agreed by the members of the Committee.
- 5.3 The Committee shall be responsible for providing recommendations to the Board with respect to CSR Activities that may be undertaken by the Company in accordance with the CSR Policy as well as the Companies Act and the CSR Rules.
- 5.4 Without prejudice to the generality of the foregoing, the CSR Committee shall be responsible for the following activities:
 - (a) Formulating and recommending CSR activities to the board of directors, in compliance with provisions of the Companies Act and the CSR Rules;
 - (b) Identifying projects/activities, setting measurable physical targets with time frame, for undertaking CSR;

- (c) Recommending amount of expenditure and effectively CSR budget;
- (d) Spending the allocated CSR amount on the CSR Activities once it is approved by the Board of the Company in accordance with the Companies Act and the CSR Rules and to take periodical review for improving / upgrading CSR strategies;
- (e) Creating transparent monitoring mechanism for implementation of CSR initiatives;
- (f) Submitting the reports to the Board in respect of the CSR Activities undertaken by the Company;
- (g) Monitoring implementation of this Policy of the Company; and
- (h) Formulating annual action plan, in pursuance of this Policy in accordance with the applicable law, and inclusive of the following items, and which the Board may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect:
 - (i) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Companies Act;
 - (ii) the manner of execution of such projects or programmes;
 - (iii) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
 - (iv) monitoring and reporting mechanism for the projects or programmes; and
 - (v) details of need and impact assessment, if any, for the projects undertaken by the company.

6. **RESPONSIBILITIES OF THE BOARD**

6.1 The Board of Directors or, when the Company establishes a Committee, the Committee, shall have the following responsibilities in connection with this CSR Policy:

- (a) to formulate and recommend CSR projects to the Board;
- (b) to approve the amount of CSR Expenditure to be allocated for each CSR project in an FY;
- (c) to formulate and approve the CSR Policy, which shall outline the activities to be undertaken by the Company in specific areas or subject matters as specified in Schedule VII of Companies Act and CSR Rules;
- (d) to monitor implementation of this Policy of the Company and review the overall performance of CSR projects;

- (e) to review this Policy from time to time to update it should there be a change in the Companies Act or CSR Rules or for other reason that would warrant its review and update;
- (f) to review the annual action plan recommended by the Committee in accordance with the principles laid down in this Policy and in accordance with the Companies Act and the pCSR Rules, and adopt the same; and
- (g) to carry out any other function as mandated by the Board or Committee, as the case may be, from time to time and/or enforced by any statutory notification, amendment or modification as may be applicable or as may be necessary or appropriate for performance of its duties.

7. MANNER OF IMPLEMENTATION

7.1 The CSR Activities may be undertaken by the Company directly by itself or with the prior approval of the Board, through any of the following entities as 'implementation agency' being duly registered with the Government of India. and having a unique CSR Registration Number:

- (a) Company established under Section 8 of Indian Companies Act, or Trust, or Society (registered under Section 12-A and 80-G of the Income Tax Act 1961, being established by the Company, either singly or along with any other company;
- (b) Company established under Section 8 of Indian Companies Act, or trust, or society, being established by (Indian) Central Government or (Indian) State Government;
- (c) Company established under Section 8 of Indian Companies Act, or trust, or society (registered under Section 12-A and 80-G of the (Indian) Income Tax Act 1961, and having an established track record of at least 3 (three) years in undertaking similar CSR activities; or
- (d) Any entity established under an act of (Indian) Parliament or a (Indian) State Legislature.

7.2 The Company shall conduct due diligence prior to selection of an entity as its implementation agency, to inter alia verify the credentials and ensure that the proposed implementation agency is eligible and capable to be appointed as such.

7.3 The Company may engage international organisations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR policy as well as for capacity building of their own personnel for CSR.

7.4 The Company shall execute and undertake the CSR Activities in identified locations where the Company has presence.

8. CSR FUNDING AND CSR EXPENDITURE

8.1 **CSR Budget:** In order to ensure funding for the CSR Activities, the Company shall allocate 2% (two per cent) of the average net profits before tax made by the Company (shareholders' profit) in its immediately preceding 3 (three) financial years.

- 8.2 **CSR Expenditure Funds:** The Committee will present the annual action plan to the Board, detailing the action steps, modalities and the Estimated CSR Expenditure to the Company, for the Board's approval.

9. **MONITORING OF CSR ACTIVITIES**

- 9.1 The Committee or Board, as the case may be, shall appoint a 'Monitoring Committee' to monitor the progress of the Projects and provide a half-yearly report to the Board.
- 9.2 Projects shall be subject to audit and review on a regular basis. To the extent necessary, there shall also be regular capacity building at all levels of execution or implementation.

10. **REVIEW AND APPROVAL OF POLICY**

This Policy will be reviewed by the Committee and approved by the Board, at least [annually] or as and when required.

11. **DISCLOSURE**

This Policy shall be disclosed on the website of the Company.

12. **INTERPRETATION**

- 12.1 In all circumstances where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation, or standard governing the Company, the said law, rule, regulation, or standard will take precedence over this Policy.
- 12.2 Any and all terms which have been defined under the Companies Act (including subordinate legislations thereunder) shall be construed as per such definitions in these laws.